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

Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

To:	Interested Parties
Date:	January 26, 2015
From:	Matthew Stuckey, Chief Permits Branch Office of Air Quality
Source Name:	Structural Composites of Indiana, Inc.
Permit Level:	Title V Significant Permit Modification
Permit Number:	113-35078-00074
Source Location:	1118 Gerber Street and 1116 Gerber Street Ligonier, Indiana
Type of Action Taken:	Modification at an existing source Revisions to permit requirements Changes that are administrative in nature

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 35078.

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 permit modification 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) 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.

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of a Title V operating permit or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impractible to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency
401 M Street
Washington, D.C. 20406

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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January 26, 2015

Mr. Scott Rasler
Structural Composites of Indiana, Inc.
1118 Gerber Street
Ligonier, IN 46767

Re: 113-35078-00074
Significant Permit Modification to
Part 70 Renewal No.: T113-29976-00074

Dear Mr. Rasler:

Structural Composites of Indiana, Inc. was issued a Part 70 Operating Permit Renewal No. T113-29976-00074 on August 12, 2011, for a stationary fiberglass reinforced composites manufacturing company located at 1118 Gerber Street and 1116 Gerber Street, Ligonier, Indiana 46767. An application requesting changes to this permit was received on September 11, 2014. Pursuant to the provisions of 326 IAC 2-7-12, significant permit modification to this permit is hereby approved as described in the attached Technical Support Document.

Please find attached the entire Part 70 Operating Permit as modified. The permit references the below listed attachment. Since this attachment has been provided in previously issued approvals for this source, IDEM OAQ has not included a copy of this attachment with this modification:

Attachment A: 40 CFR Part 63, Subpart WWWW, National Emission Standards for Hazardous Air Pollutants for Reinforced Plastic Composites Production

Previously issued approvals for this source containing these attachments are available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/.

Federal rules under Title 40 of United States Code of Federal Regulations may also be found on the U.S. Government Printing Office's Electronic Code of Federal Regulations (eCFR) website, located on the Internet at: http://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title40/40tab_02.tpl.

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 Brandon Miller, of my staff, at 317-234-5373 or 1-800-451-6027, and ask for extension 4-5373.

Sincerely,

Iryn Calilung, Section Chief
Permits Branch
Office of Air Quality

Attachments: Updated Permit, Technical Support Document and Appendix A

IC/bdm

cc: File - Noble County
Noble County Health Department
U.S. EPA, Region V
Compliance and Enforcement Branch
Billing, Licensing and Training Section
IDEM Northern Regional Office

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Commissioner

Part 70 Operating Permit Renewal

OFFICE OF AIR QUALITY

Structural Composites of Indiana, Inc.
1118 Gerber Street
and
1116 Gerber Street
Ligonier, Indiana 46767

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

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

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

Operation Permit No.: T113-29976-00074	
Original signed by: Chrystal A. Wagner, Section Chief Permits Branch Office of Air Quality	Issuance Date: August 12, 2011 Expiration Date: August 12, 2016

Significant Permit Modification No. 113-32573-000074

Significant Permit Modification No.: 113-35078-00074	
Issued by: Iryn Calilung, Section Chief, Permits Branch Office of Air Quality	Issuance Date: January 26, 2015

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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 fiberglass reinforced plastic composites manufacturing source.

Source Address:	1118 Gerber Street, Ligonier, Indiana 46767 and 1116 Gerber Street, Ligonier, Indiana 46767
General Source Phone Number:	260-894-4083
SIC Code:	3089 (Plastics Products, Not Elsewhere Classified)
County Location:	Noble
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Operating Permit Program Minor Source, under PSD Rules Major Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

This source consists of two (2) Buildings:

(a) Building 1 is located at 1118 Gerber Street, Ligonier, Indiana 46767; and

(b) Building 2 is located at 1116 Gerber Street, Ligonier, Indiana 46767.

These two plants are located on contiguous properties, have the same SIC codes and are under common control, therefore they will be considered as one (1) source, as defined by 326 IAC 2-7-1(22).

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

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

Building 1:

(a) One (1) gel and lamination area, identified as GL1, constructed in 2000 and approved for modification in 2013, with three (3) exhaust fans with a flow rate of 10,000 cubic feet per minute, exhausting to stack GB-01, consisting of the following:

(1) One (1) gel coating process, identified as G1, constructed in 2000, equipped with air-assisted airless spray guns, utilizing dry filters for particulate control, approximate capacity: 482.92 pounds of gel coat per hour.

(2) One (1) gel coating process, identified as G1B, approved for construction in 2013, equipped with air-assisted airless spray guns, with a maximum capacity of 482.92 pounds of gel coat per hour, utilizing dry filters for particulate control.

(3) One (1) lamination process, identified as L1, constructed in 2000, equipped with flow coater equipment, utilizing dry filters for particulate control, approximate capacity: 1785.53 pounds of resin per hour.

(4) One (1) lamination process, identified as L1B, approved for construction in 2013, with a maximum capacity of 1785.53 pounds of resin per hour, equipped with flow coater equipment, utilizing dry filters for particulate control.

Each above gel coating and lamination process is considered an open molding process under 40 CFR 63, Subpart WWWW.

(b) One (1) mold preparation and final finish area, identified as PF1, constructed in 2000, equipped with spray applicators, utilizing dry filters for particulate control.

This is an open molding process under 40 CFR 63, Subpart WWWW.

(c) One (1) Roof production process consisting of:

(1) One (1) gel coating process, identified as G2, constructed in 2003, equipped with air-assisted airless spray applicators, utilizing dry filters for particulate control, exhausting to Stack SV-4, capacity: 13.5 pounds of gel coat per hour, and

(2) One (1) lamination process, identified as identified as L3, approved for construction in 2013, equipped with flow coaters, with a maximum capacity of 56.45 pounds of resin per, utilizing dry filters for particulate control, and exhausting to stack SV4.

The Roof production process is considered an open molding process under 40 CFR 63, Subpart WWWW.

(d) One (1) Tooling production process consisting of:

(1) One (1) gel coating station, identified as G3, constructed in 2003, equipped with air-assisted airless spray applicators, with a maximum capacity of 1.1 pounds of gel coat per hour, utilizing dry filters for particulate control, exhausting to Stack SV-6, and

(2) One (1) lamination station, identified as L2, constructed in 2003, equipped with flow coaters, with a maximum capacity of 5.153 pounds of resin per hour, utilizing dry filters for particulate control, exhausting to Stack SV-6.

The above Tooling production process is considered an open molding process under 40 CFR 63, Subpart WWWW.

(e) One (1) Specialty production process consisting of:

(1) One (1) gel coating station, identified as G4, approved for construction in 2013, equipped with air-assisted airless spray applicators, with a maximum capacity of 11.88 pounds of gel coat per hour, utilizing dry filters for particulate control, exhausting to Stack SV-5, and

(2) One (1) lamination station, identified as L4, approved for construction in 2013, equipped with flow coaters, with a maximum capacity of 13.43 pounds of resin per hour, utilizing dry filters for particulate control, and exhausting to Stack SV-5.

The above Specialty production process is considered an open molding process under 40 CFR 63, Subpart WWWW.

(f) One (1) closed molding process, identified as CM1, constructed in 2003, capacity: 45.94 pounds of resin per hour. This is a closed molding process under 40 CFR 63, Subpart WWWW.

(g) One (1) grinding booth, identified as GR1, constructed in 2000, consisting of grinders, diamond cutters, and various hand tools, utilizing dry filters for particulate control, exhausting inside the building, capacity: 1,210 pounds per hour.

(h) One (1) grinding booth, identified as GR2, approved in 2014 for construction, consisting of grinders, diamond cutters, and various hand tools, utilizing a high efficiency cartridge filtration system for particulate control, exhausting inside the building, capacity: 1,210 pounds per hour.

Building 2:

(i) One (1) Pattern gel coating station, identified as G5, approved for construction in 2013, equipped with air-assisted airless spray applicators, with a maximum capacity of 1.72 pounds of gel coat per hour, utilizing dry filters for particulate control, exhausting to Stack SV-7.

This gel coating process is considered an open molding process under 40 CFR 63, Subpart WWWW.

(j) One (1) wood pattern shop, identified as PS1, approved for construction in 2013, with a maximum capacity of 400 pounds of wood per hour, utilizing a high efficiency return-air cartridge system for PM control considered as integral to the woodworking operation, exhausting indoors.

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

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

(a) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.

(b) Welding operations, with emissions equal to or less than the insignificant thresholds of five (5) pounds per hour or twenty-five (25) pounds per day for PM, SO_2, and/or NO_X, three (3) pounds per hour or fifteen (15) pounds per day for VOC, twenty-five (25) pounds per day for CO or 0.6 tons per year or 3.29 pounds per day of lead: consisting of two (2) arc welders, one (1) oxyacetylene torch.

(c) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone.

(d) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour:

(1) Five (5) natural gas-fired radiant heaters, heat input capacity: 0.03 million British thermal units per hour, each.

(2) One (1) natural gas-fired air make-up system, heat input capacity: 3.575 million British thermal units per hour.

(3) Three (3) natural gas-fired radiant heaters, heat input capacity: 0.15 million British thermal units per hour.

(4) One (1) natural gas-fired oven, heat input capacity: 0.225 million British thermal units per hour.

(e) Propane for liquefied petroleum gas, or butane-fired combustion sources with heat input equal to or less than six million (6,000,000) British thermal units per hour.

(f) The following VOC and HAP storage containers: Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.

(g) Infrared cure equipment.

(h) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

(i) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.

(j) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.

(k) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals measured at 38°C).

(l) One (1) bulk resin storage tank, identified as T1**,** capacity: 6,000 gallons.

(m) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]

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

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

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

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

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

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

(a) This permit, T 113-29976-00074, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

(b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

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

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

(a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or

(b) the emission unit to which the condition pertains permanently ceases operation.

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

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

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

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

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

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

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

(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.

(b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

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

(a) A certification required by this permit meets the requirements of 326 IAC 2-7-6(1) if:

(1) it contains a certification by a "responsible official" as defined by 326 IAC 2-7-1(35), and

(2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.

(c) A "responsible official" is defined at 326 IAC 2-7-1(35).

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

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

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

and

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

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and

(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

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

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

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

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

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

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

The Permittee shall implement the PMPs.

(b) If required by specific condition(s) in Section D of this permit where no PMP was previously required, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:

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

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

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

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

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

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

The Permittee shall implement the PMPs.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

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

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

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

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

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

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

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, 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 T 113-29976-00074 and issued pursuant to permitting programs approved into the state implementation plan have been either:

(1) incorporated as originally stated,

(2) revised under 326 IAC 2-7-10.5, or

(3) deleted under 326 IAC 2-7-10.5.

(b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

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

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

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

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit.
[326 IAC 2-7-5(6)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

(1) That this permit contains a material mistake.

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

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

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

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

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

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

Request for renewal shall be submitted to:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

(4) The Permittee notifies the:

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

and

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

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

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

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

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

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

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

(3) Any change in emissions; and

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

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

(c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

(d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

(e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

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

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

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

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

(a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;

(c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

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

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

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

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

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

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

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

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

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

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

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

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

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

C.2 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

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

C.6 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]

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.

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(32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

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

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

C.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.

(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

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

Building 1:

(a) One (1) gel and lamination area, identified as GL1, constructed in 2000 and approved for modification in 2013, with three (3) exhaust fans with a flow rate of 10,000 cubic feet per minute, exhausting to stack GB-01, consisting of the following:

(1) One (1) gel coating process, identified as G1, constructed in 2000, equipped with air-assisted airless spray guns, utilizing dry filters for particulate control, approximate capacity: 482.92 pounds of gel coat per hour.

(2) One (1) gel coating process, identified as G1B, approved for construction in 2013, equipped with air-assisted airless spray guns, with a maximum capacity of 482.92 pounds of gel coat per hour, utilizing dry filters for particulate control.

(3) One (1) lamination process, identified as L1, constructed in 2000, equipped with flow coater equipment, utilizing dry filters for particulate control, approximate capacity: 1785.53 pounds of resin per hour.

(4) One (1) lamination process, identified as L1B, approved for construction in 2013, with a maximum capacity of 1785.53 pounds of resin per hour, equipped with flow coater equipment, utilizing dry filters for particulate control.

Each above gel coating and lamination process is considered an open molding process under 40 CFR 63, Subpart WWWW.

(b) One (1) mold preparation and final finish area, identified as PF1, constructed in 2000, equipped with spray applicators, utilizing dry filters for particulate control.

This is an open molding process under 40 CFR 63, Subpart WWWW.

(c) One (1) Roof production process consisting of:

(1) One (1) gel coating process, identified as G2, constructed in 2003, equipped with air-assisted airless spray applicators, utilizing dry filters for particulate control, exhausting to Stack SV-4, capacity: 13.5 pounds of gel coat per hour,
and

(2) One (1) lamination process, identified as identified as L3, approved for construction in 2013, equipped with flow coaters, with a maximum capacity of 56.45 pounds of resin per, utilizing dry filters for particulate control, and exhausting to stack SV4.

The Roof production process is considered an open molding process under 40 CFR 63, Subpart WWWW.

(d) One (1) Tooling production process consisting of:

(1) One (1) gel coating station, identified as G3, constructed in 2003, equipped with air-assisted airless spray applicators, with a maximum capacity of 1.1 pounds of gel coat per hour, utilizing dry filters for particulate control, exhausting to Stack SV-6, and

(2) One (1) lamination station, identified as L2, constructed in 2003, equipped with flow coaters, with a maximum capacity of 5.153 pounds of resin per hour, utilizing dry filters

for particulate control, exhausting to Stack SV-6.

The above Tooling production process is considered an open molding process under 40 CFR 63, Subpart WWWW.

(e) One (1) Specialty production process consisting of:

(1) One (1) gel coating station, identified as G4, approved for construction in 2013, equipped with air-assisted airless spray applicators, with a maximum capacity of 11.88 pounds of gel coat per hour, utilizing dry filters for particulate control, exhausting to Stack SV-5, and

(2) One (1) lamination station, identified as L4, approved for construction in 2013, equipped with flow coaters, with a maximum capacity of 13.43 pounds of resin per hour, utilizing dry filters for particulate control, and exhausting to Stack SV-5.

The above Specialty production process is considered an open molding process under 40 CFR 63, Subpart WWWW.

(f) One (1) closed molding process, identified as CM1, constructed in 2003, capacity: 45.94 pounds of resin per hour.

This is a closed molding process under 40 CFR 63, Subpart WWWW.

Building 2:

(i) One (1) Pattern gel coating station, identified as G5, approved for construction in 2013, equipped with air-assisted airless spray applicators, with a maximum capacity of 1.72 pounds of gel coat per hour, utilizing dry filters for particulate control, exhausting to Stack SV-7.

This gel coating process is considered an open molding process under 40 CFR 63, Subpart WWWW.

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

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

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

(a) Pursuant to MSOP 113-11385-00074, issued on March 3, 2000, Significant Permit Modification 113-16656-00074, issued on April 14, 2003, and 326 IAC 8-1-6 (BACT), the operating conditions shall be as follows:

(1) Use of resins and gel coats that contain styrene from the emission units identified as G1, L1, and PF1 shall be limited such that the potential to emit (PTE) volatile organic compounds (VOC) from use of such resins and gel coats only shall be less than one hundred (100) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

(2) Use of resins and gel coats that contain styrene from the emission units identified as G2, G3, L2, and CM1, shall be limited such that the potential to emit (PTE) volatile organic compounds (VOC) from use of such resins and gel coats only shall be less than one hundred (100) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

(b) The HAP monomer content of resins and gel coats used shall be limited to the following

or their equivalent on an emissions mass basis:

Type of Gel Coat or Resin	Content, % by weight
Production[1] Gel Coat	37
Tooling Gel[2] Coat	38
Production Resin	35
Tooling Resin	43

[1]Production refers to the manufacture of parts
[2]Tooling refers to the manufacture of the molds from which parts are manufactured.

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

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

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

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

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

(e) The listed work practices shall be followed:

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

(2) For VOC- and/or HAP-containing materials:

(i) Cleanup solvent containers shall be used to transport solvent from drums to work.

(ii) Cleanup stations shall be closed containers having soft-gasketed, spring-loaded closures and shall be kept completely closed when not in use.

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

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

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

(3) All material storage containers shall be kept covered when not in use.

D.1.2 PSD Minor Limit VOC, PM, PM10, PM2.5 [326 IAC 2-2]

In order to render 326 IAC 2-2 not applicable, the Permittee shall comply with the following:

(a) The use of resins and gel coats from the emission units identified as G1, L1, PF1, G2, G3, L2, CM1, G1B, L1B, L3, G4, L4 and G5 shall be limited such that the potential to emit (PTE) volatile organic compounds (VOC) of the resins and gel coats at the source shall be equal to or less than two hundred and forty-nine (249) tons per twelve (12) consecutive month period with compliance at the end of each month.

(b) The PM, PM10 and PM2.5 emissions from G1 shall be limited as follows:

(1) The PM emission rate after control shall not exceed 19.0 pounds per hour.

(2) The PM10 emission rate after control shall not exceed 19.0 pounds per hour.

(3) The PM2.5 emission rate after control shall not exceed 19.0 pounds per hour.

(c) The PM, PM10 and PM2.5 emissions from G1B shall be limited as follows:

(1) The PM emission rate after control shall not exceed 19.0 pounds per hour.

(2) The PM10 emission rate after control shall not exceed 19.0 pounds per hour.

(3) The PM2.5 emission rate after control shall not exceed 19.0 pounds per hour.

Compliance with these limits, combined with the limited PTE in Conditions D.2.2 and D.3.1 and the potential to emit VOC, PM, PM10, and PM2.5, from all other emission units at this source, shall limit the source-wide total potential to emit of VOC, PM10, PM2.5, and to less than 250 tons per 12 consecutive month period, each, and shall render 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), not applicable

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

Pursuant to 326 IAC 6-3-2(d), particulate from the following processes of the GL1 gel and lamination area: G1, G1B, L1, PF1, G2, G3, G4, G5, and L2 shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

D.1.4 Operator Training for Reinforced Plastic Composites Fabrication [326 IAC 20-56-2]

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

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

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

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

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

(1) Appropriate application techniques.

(2) Appropriate equipment cleaning procedures.

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

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

(1) A copy of the current training program.

(2) A list of the following:

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

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

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

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

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

Compliance Determination Requirements

D.1.6 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

Compliance with the VOC and VHAP content and usage limitations contained in Conditions D.1.1 and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.7 Volatile Organic Compounds (VOC) [326 IAC 8-1-6] [326 IAC 2-2]

(a) Compliance with Conditions D.1.1 and D.1.2 shall be determined based upon the following criteria:

(1) Monthly usage by weight, content of monomer that is HAP, method of application, and other emission reduction techniques used for each gel coat and resin shall be recorded.

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

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

(2) Emission factors shall be taken from the following reference approved by IDEM, OAQ: American Composites Manufacturers Association (ACMA) Emission Models for the Reinforced Plastics Industries, Unified Emission Factors, October 2009, or its updates.

(b) Gel coats or resins with HAP monomer contents lower than those specified in the table in Condition D.1.1(b) or additional emission reduction techniques approved by IDEM, OAQ may be used to offset the use of gel coats or resins with HAP monomer contents higher than those specified in the table in this subsection. This is allowed to meet the HAP monomer content limits for resins and gel coats and shall be calculated on an equivalent emissions mass basis as shown below:

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

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

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

D.1.8 Particulate Control [326 IAC 2-7-6(6)]

In order to comply with Condition D.1.2(b), the dry filters for particulate control shall be in operation and control emissions from the gel coating processes, identified as G1, and G1B, at all times while these facilities are in operation.

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

D.1.9 Monitoring [40 CFR 64]

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the reinforced plastics composites fabricating manufacturing processes (G1, G1B, L1, PF1, G2, G3, and L2) stacks (GB-01, SV-4, SV-5, SV-6 and G7) while one or more of the booths are in operation. If a condition exists which should result in a response step the Permittee shall take reasonable response. Section C – Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps. Section C – Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

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

D.1.10 Record Keeping Requirements

(a) To document the compliance status with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (7) below. Records maintained for (1) through (7) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and the VOC emission limits established in Condition D.1.1 and D.1.2. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

(1) The amount and VOC content of each resin, gel coat and solvent used.

(2) The amount of resin and gel coat material and solvent less water used on monthly basis.

(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.

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

(4) The volume weighted VOC content of the resins and gel coats used for each month;

(5) The cleanup solvent usage for each month;

(6) The total VOC usage and volatile organic HAP usage for each month; and

(7) The weight of VOCs and volatile organic HAPs emitted for each compliance period.

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

(1) A copy of the current training program.

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

(c) To document the compliance status with Condition D.1.9, the Permittee shall maintain a log of weekly overspray observations, and daily and monthly inspections.

(d) 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) A quarterly summary of the information to document the compliance status with Conditions D.1.1(a) and D.1.2(a) shall be submitted to the address listed in Section C – General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require a certification that

meets the requirements of 326 IAC 2-7-6(1) by a “responsible official” as defined by 326 IAC 2-7-1(35).

SECTION D.2 FACILITY OPERATION CONDITIONS

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

(g) One (1) grinding booth, identified as GR1, constructed in 2000, consisting of grinders, diamond cutters, and various hand tools, utilizing dry filters for particulate control, exhausting inside the building, capacity: 1,210 pounds per hour.

(h) One (1) grinding booth, identified as GR2, approved in 2014 for construction, consisting of grinders, diamond cutters, and various hand tools, utilizing a high efficiency cartridge filtration system for particulate control, exhausting inside the building, capacity: 1,210 pounds per hour.

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

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

D.2.1 Particulate [326 IAC 6-3-2]

(a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emission rate from the grinding booth GR1 shall not exceed 2.93 pounds per hour when operating at a process weight rate of 1,210 pounds (0.605 tons) per hour.

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

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

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

(b) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emission rate from the grinding booth GR2 shall not exceed 2.93 pounds per hour when operating at a process weight rate of 1,210 pounds (0.605 tons) per hour.

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

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

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

D.2.2 PSD Minor Limit [326 IAC 2-2]

(a) In order to render 326 IAC 2-2 not applicable, the PM, PM10 and PM2.5 emission rate from the grinding booth GR1 shall be as follows:

(1) The PM emission rate after control shall not exceed 2.93 pounds per hour.

(2) The PM10 emission rate after control shall not exceed 2.93 pounds per hour.

(3) The PM2.5 emission rate after control shall not exceed 2.93 pounds per hour.

(b) In order to render 326 IAC 2-2 not applicable, the PM, PM10 and PM2.5 emission rate

from the grinding booth GR2 shall be as follows:

(1) The PM emission rate after control shall not exceed 2.93 pounds per hour.

(2) The PM10 emission rate after control shall not exceed 2.93 pounds per hour.

(3) The PM2.5 emission rate after control shall not exceed 2.93 pounds per hour.

Compliance with these limits, combined with the limited PTE in Conditions D.1.2 and D.3.1 and the potential to emit from other emission units at this source, shall limit the source-wide total potential to emit PM, PM10 and PM2.5 to less than 250 tons per 12 consecutive month period and shall render 326 IAC 2-2 (PSD) not applicable.

D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

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

Compliance Determination Requirements

D.2.4 Particulate Control [326 IAC 2-7-6(6)]

In order to comply with Conditions D.2.1 and D.2.2, the dry filters and cartridge filtration system for particulate control shall be in operation and control emissions from the grinding booth GR1 and grinding booth GR2 at all times that the grinding booth GR1 and grinding booth GR2 are in operation, respectively.

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

D.2.5 Filter Inspections

(a) An inspection shall be performed each calendar quarter of all dry filters controlling the grinding booth GR1.

(b) An inspection shall be performed each calendar quarter of cartridge filtration system controlling the grinding booth GR2.

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

D.2.6 Record Keeping Requirements

(a) To document the compliance status with Condition D.2.5, the Permittee shall maintain records of the results of the inspections required under Condition D.2.5.

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

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(14)]: Wood Pattern Shop Operations

(j) One (1) wood pattern shop, identified as PS1, approved for construction in 2013, with a maximum capacity of 400 pounds of wood per hour, utilizing a high efficiency return-air cartridge system for PM control considered as integral to the woodworking operation, exhausting indoors.

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

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

D.3.1 PSD Minor Limit [326 IAC 2-2]

In order to render 326 IAC 2-2 not applicable, the PM, PM10 and PM2.5 emission rate from the wood pattern shop PS1 shall be as follows:

(a) The PM emission rate after control shall not exceed 1.39 pounds per hour.

(b) The PM10 emission rate after control shall not exceed 1.39 pounds per hour.

(c) The PM2.5 emission rate after control shall not exceed 1.39 pounds per hour.

Compliance with this limit, combined with the limited PTE in Conditions D.1.2 and D.2.2 and the potential to emit from other emission units at this source, shall limit the source-wide total potential to emit PM, PM10 and PM2.5 to less than 250 tons per 12 consecutive month period and shall render 326 IAC 2-2 (PSD) not applicable.

D.3.2 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emission rate from the wood pattern shop PS1 shall not exceed 1.39 pounds per hour when operating at a process weight rate of 400 pounds per hour.

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

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

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

D.3.3 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

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

Compliance Determination Requirements

D.3.4 Particulate Control [326 IAC 2-7-6(6)]

In order to comply with Conditions D.3.1 and D.3.2, the high efficiency return-air cartridge system for particulate control shall be in operation and control emissions from the wood pattern shop PS1 at all times that this facility is in operation.

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

D.3.5 Cartridge Inspections

An inspection shall be performed each calendar quarter of all cartridges controlling the woodworking operation.

D.3.6 Cartridge Failure Detection

In the event that cartridge failure has been observed:

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

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

D.3.7 Record Keeping Requirements

(a) To document the compliance status with Condition D.3.5, the Permittee shall maintain records of the results of the inspections required under Condition D.3.5.

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

SECTION E.1 FACILITY OPERATION CONDITIONS

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

Building 1:

(a) One (1) gel and lamination area, identified as GL1, constructed in 2000 and approved for modification in 2013, with three (3) exhaust fans with a flow rate of 10,000 cubic feet per minute, exhausting to stack GB-01, consisting of the following:

(1) One (1) gel coating process, identified as G1, constructed in 2000, equipped with air-assisted airless spray guns, utilizing dry filters for particulate control, approximate capacity: 482.92 pounds of gel coat per hour.

(2) One (1) gel coating process, identified as G1B, approved for construction in 2013, equipped with air-assisted airless spray guns, with a maximum capacity of 482.92 pounds of gel coat per hour, utilizing dry filters for particulate control.

(3) One (1) lamination process, identified as L1, constructed in 2000, equipped with flow coater equipment, utilizing dry filters for particulate control, approximate capacity: 1785.53 pounds of resin per hour.

(4) One (1) lamination process, identified as L1B, approved for construction in 2013, with a maximum capacity of 1785.53 pounds of resin per hour, equipped with flow coater equipment, utilizing dry filters for particulate control.

Each above gel coating and lamination process is considered an open molding process under 40 CFR 63, Subpart WWWW.

(b) One (1) mold preparation and final finish area, identified as PF1, constructed in 2000, equipped with spray applicators, utilizing dry filters for particulate control.

This is an open molding process under 40 CFR 63, Subpart WWWW.

(c) One (1) Roof production process consisting of:

(1) One (1) gel coating process, identified as G2, constructed in 2003, equipped with air-assisted airless spray applicators, utilizing dry filters for particulate control, exhausting to Stack SV-4, capacity: 13.5 pounds of gel coat per hour, and

(2) One (1) lamination process, identified as identified as L3, approved for construction in 2013, equipped with flow coaters, with a maximum capacity of 56.45 pounds of resin per, utilizing dry filters for particulate control, and exhausting to stack SV4.

The Roof production process is considered an open molding process under 40 CFR 63, Subpart WWWW.

(d) One (1) Tooling production process consisting of:

(1) One (1) gel coating station, identified as G3, constructed in 2003, equipped with air-assisted airless spray applicators, with a maximum capacity of 1.1 pounds of gel coat per hour, utilizing dry filters for particulate control, exhausting to Stack SV-6, and

(2) One (1) lamination station, identified as L2, constructed in 2003, equipped with flow coaters, with a maximum capacity of 5.153 pounds of resin per hour, utilizing dry filters for particulate control, exhausting to Stack SV-6.

The above Tooling production process is considered an open molding process under 40 CFR 63, Subpart WWWW.

(e) One (1) Specialty production process consisting of:

(1) One (1) gel coating station, identified as G4, approved for construction in 2013, equipped with air-assisted airless spray applicators, with a maximum capacity of 11.88 pounds of gel coat per hour, utilizing dry filters for particulate control, exhausting to Stack SV-5, and

(2) One (1) lamination station, identified as L4, approved for construction in 2013, equipped with flow coaters, with a maximum capacity of 13.43 pounds of resin per hour, utilizing dry filters for particulate control, and exhausting to Stack SV-5.

The above Specialty production process is considered an open molding process under 40 CFR 63, Subpart WWWW.

(f) One (1) closed molding process, identified as CM1, constructed in 2003, capacity: 45.94 pounds of resin per hour. This is a closed molding process under 40 CFR 63, Subpart WWWW.

Building 2:

(i) One (1) Pattern gel coating station, identified as G5, approved for construction in 2013, equipped with air-assisted airless spray applicators, with a maximum capacity of 1.72 pounds of gel coat per hour, utilizing dry filters for particulate control, exhausting to Stack SV-7.

This gel coating process is considered an open molding process under 40 CFR 63, Subpart WWWW.

(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]

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

E.1.2 National Emission Standards for Reinforced Plastics Composites Production [40 CFR Part 63, Subpart WWWW]

(a) Pursuant to 40 CFR Part 63, Subpart WWWW, the Permittee shall comply with the provisions of National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production, which is incorporated by reference as 326 IAC 20-56-1, for the units as specified above. A copy of this rule is included as Attachment A. This source is subject to the following requirements of 40 CFR Part 63, Subpart WWWW:

(1) 40 CFR 63.5780
(2) 40 CFR 63.5785 (a)
(3) 40 CFR 63.5790 (a), (b) and (c)
(4) 40 CFR 63.5795 (b)

(5) 40 CFR 63.5796
(6) 40 CFR 63.5797 (a), (b) and (c)
(7) 40 CFR 63.5798 (a) and (b)
(8) 40 CFR 63.5800
(9) 40 CFR 63.5805 (a), (b) (d), (e), (f), and (g)
(10) 40 CFR 63.5810
(11) 40 CFR 63.5835 (a) and (c)
(12) 40 CFR 63.5840
(13) 40 CFR 63.5860 (a)
(14) 40 CFR 63.5895 (c) and (d)
(15) 40 CFR 63.5900 (a) (2), (3), and (4), (b) and (c)
(16) 40 CFR 63.5905
(17) 40 CFR 63.5910 (a), (b), (c)(1), (2), (3), (4) and (5), (d), (g), (h) and (i)
(18) 40 CFR 63.5915 (a), (c) and (d)
(19) 40 CFR 63.5920
(20) 40 CFR 63.5925
(21) 40 CFR 63.5930
(22) 40 CFR 63.5935
(23) Tables 1, 2, 3, 4, 7, 8, 9, 13 and 14

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

Source Name: Structural Composites of Indiana, Inc.
Source Address: 1118 Gerber Street, Ligonier, Indiana 46767, and
1116 Gerber Street, Ligonier, Indiana 46767
Part 70 Permit No.: T113-29976-00074

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: Structural Composites of Indiana, Inc.
Source Address: 1118 Gerber Street, Ligonier, Indiana 46767, and
1116 Gerber Street, Ligonier, Indiana 46767
Part 70 Permit No.: T113-29976-00074

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: Structural Composites of Indiana, Inc.
Source Address: 1118 Gerber Street, Ligonier, Indiana 46767
1116 Gerber Street, Ligonier, Indiana 46767
Part 70 Permit No.: T113-29976-00074
Facility: G1, L1, and PF1
Parameter: Volatile Organic HAP (VHAP) usage.
Limit: Less than one hundred (100) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

QUARTER: YEAR:

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

☐ No deviation occurred in this quarter.

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

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

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

Part 70 Quarterly Report

Source Name: Structural Composites of Indiana, Inc.
Source Address: 1118 Gerber Street, Ligonier, Indiana 46767
1116 Gerber Street, Ligonier, Indiana 46767
Part 70 Permit No.: T113-29976-00074
Facility: G2, G3, L2, and CM1
Parameter: Volatile Organic HAP (VHAP) usage.
Limit: Less than one hundred (100) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

QUARTER: YEAR:

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

☐ No deviation occurred in this quarter.

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

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

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

Part 70 Quarterly Report

Source Name: Structural Composites of Indiana, Inc.
Source Address: 1118 Gerber Street, Ligonier, Indiana 46767
1116 Gerber Street, Ligonier, Indiana 46767
Part 70 Permit No.: T113-29976-00074
Facility: G1, L1, PF1, G2, G3, L2, CM1, G1B, L1B, L3, G4, L4 and G5
Parameter: Volatile Organic HAP (VHAP) usage.
Limit: Less than two hundred and forty-nine (249) tons per twelve (12) consecutive month period for the source with compliance determined at the end of each month.

QUARTER: YEAR:

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

☐ No deviation occurred in this quarter.

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

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

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

Source Name: Structural Composites of Indiana, Inc.
Source Address: 1118 Gerber Street, Ligonier, Indiana 46767
1116 Gerber Street, Ligonier, Indiana 46767
Part 70 Permit No.: T113-29976-00074

Months: _____ to _____ Year: _____

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

□ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

□ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

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

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

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

Indiana Department of Environmental Management
Office of Air Quality

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

Source Description and Location

Source Name:	Structural Composites of Indiana, Inc.
Source Location:	1118 Gerber Street, Ligonier, Indiana 46767 and 1116 Gerber Street, Ligonier, Indiana 46767
County:	Noble
SIC Code:	3089 (Plastics Products, Not Elsewhere Classified)
Operation Permit No.:	T 113-29976-00074
Operation Permit Issuance Date:	August 12, 2011
Significant Source Modification No.:	113-34924-00074
Significant Permit Modification No.:	113-35078-00074
Permit Reviewer:	Brandon Miller

Source Definition

This fiberglass reinforced plastic composites manufacturing company consists of two (2) plants:

(a) Building 1 is located at 1118 Gerber Street, Ligonier, Indiana 46767; and

(b) Building 2 is located at 1116 Gerber Street, Ligonier, Indiana 46767.

These plants are located on contiguous properties, have the same SIC codes, and are under common control; therefore, they are considered one (1) source, as defined by 326 IAC 2-7-1(22). This conclusion was initially determined under Significant Permit Modification No. 113-32573-00074 on July 3, 2013.

Existing Approvals

The source was issued Part 70 Operating Permit Renewal No. 113-29976-00074 on August 12, 2011. The source has since received the following approvals:

(a) Significant Source Modification No. 113-32645-00074, issued on June 18, 2013; and

(b) Significant Permit Modification No. 113-32573-00074, issued on July 3, 2013.

County Attainment Status

The source is located in Noble 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.
Unclassifiable or attainment effective April 5, 2005, for PM2.5.

(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. Noble 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) $PM_{2.5}$
Noble County has been classified as attainment for $PM_{2.5}$. Therefore, direct $PM_{2.5}$, SO_2, and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(c) Other Criteria Pollutants
Noble County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

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

Source Status - Existing Source

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

Pollutant	**Emissions** (ton/yr)
PM	213.82
PM_{10}	211.52
$PM_{2.5}$	211.52
SO_2	0.01
NO_X	1.93
VOC	249.14
CO	1.62
HAPs	
Styrene	251.14
Manganese	0.09
Hexane	0.03
Total	**251.27**

(a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no PSD regulated pollutant 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) This existing source is a major source of HAPs, as defined in 40 CFR 63.2, because HAP emissions are greater than ten (10) tons per year for a single HAP and greater than twenty-five (25) tons per year for a combination of HAPs. Therefore, this source is a major source under Section 112 of the Clean Air Act (CAA).

(c) GHG
On June 23, 2014, in the case of *Utility Air Regulatory Group v. EPA*, case no. 12-1146, (available at http://www.supremecourt.gov/opinions/13pdf/12-1146_4g18.pdf) the United States Supreme Court ruled that the U.S. EPA does not have the authority to treat greenhouse gases (GHGs) as an air pollutant for the purpose of determining operating permit applicability or PSD Major source status. On July 24, 2014, the U.S. EPA issued a memorandum to the Regional Administrators outlining next steps in permitting decisions in light of the Supreme Court's decision. U.S. EPA's guidance states that U.S. EPA will no longer require PSD or Title V permits for sources "previously classified as 'Major' based solely on greenhouse gas emissions."

The Indiana Environmental Rules Board adopted the GHG regulations required by U.S. EPA at 326 IAC 2-2-1(zz), pursuant to Ind. Code § 13-14-9-8(h) (Section 8 rulemaking). A rule, or part of a rule, adopted under Section 8 is automatically invalidated when the corresponding federal rule, or part of the rule, is invalidated. Due to the United States Supreme Court Ruling, IDEM, OAQ cannot consider GHGs emissions to determine operating permit applicability or PSD applicability to a source or modification.

Description of Proposed Modification

The Office of Air Quality (OAQ) has reviewed a modification application, submitted by Structural Composites of Indiana, Inc. on September 11, 2014, relating to the addition of a new fiber reinforced plastic composite cutting and grinding booth. The following is a list of the proposed emission unit and pollution control device:

(a) One (1) grinding booth, identified as GR2, approved in 2014 for construction, consisting of grinders, diamond cutters, and various hand tools, utilizing a high efficiency cartridge filtration system for particulate control, exhausting inside the building, capacity: 1,210 pounds per hour.

On November 10, 2014, the source requested that IDEM, OAQ reevaluate the compliance monitoring requirements for the existing grinding booth GR1 and the wood pattern shop PS1 because the units vent indoors and not through an external stack or vent. The reevaluation of monitoring conditions is the Compliance Determination and Monitoring Requirements section below.

Enforcement Issues

There are no pending enforcement actions related to this modification.

Emission Calculations

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

Permit Level Determination – Part 70 Modification to an Existing Source

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

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

Increase in PTE Before Controls of the Modification	
Pollutant	**Potential To Emit** (ton/yr)
PM	123.89
PM_{10}	123.89
$PM_{2.5}$	123.89
SO_2	-
VOC	-
CO	-
NO_X	-
Single HAPs	-
Total HAPs	-

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

(a) Approval to Construct

This source modification is subject to 326 IAC 2-7-10.5(g)(4)(A) because the potential to emit of PM, PM10, and PM2.5 is greater than twenty-five (25) tons per year before control.

(b) Approval to Operate

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 modification does not qualify as a minor permit modification or administrative amendment. It does not qualify as a minor permit modification because there will be

specific case-by-case emission limitations to render 326 IAC 2-2 not applicable, which are Title I changes under the Clean Air Act (CAA).

Permit Level Determination – PSD

Prior to this modification, the existing source was a PSD minor source with PM, PM10, PM2.5, and VOC. The source is going to maintain the existing PSD minor limits for VOC. The source will maintain its existing PM, PM10, and PM2.5 limits. The source will limit the new grinding booth GR2 for PM, PM10, and PM2.5 as shown below. The limitations for the new emission unit will maintain the PSD minor status (see table below).

In order to render 326 IAC 2-2 not applicable, the PM, PM10, and PM2.5 emission rate from grinding booth GR2 shall be as follows:

(a) The PM emission rate after control shall not exceed 2.93 pounds per hour.

(b) The PM10 emission rate after control shall not exceed 2.93 pounds per hour.

(c) The PM2.5 emission rate after control shall not exceed 2.93 pounds per hour

This modification to an existing minor PSD stationary source is not major because the total emissions of each PSD regulated pollutant are less than the PSD major source thresholds. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

PTE of the Entire Source After Issuance of the Modification

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

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of Modification (tons/year)								
	PM	PM10*	PM2.5*	SO2	NOx	VOC	CO	Total HAPs	Worst Single HAP
Building 1									
Gelcoat Process G1[1]	83.28[3]	83.28[3]	83.28[3]	-	-	<100.00[2]	-	<100.00[2]	<100.00 Styrene
Lamination Process L1[1]	-	-	-	-	-		-		
Mold Preparation PF1[1]	-	-	-	-	-		-		
Roof Gelcoat Process G2[1]	9.20	9.20	9.20	-	-	<100.00[2]	-	<100.0[2]	<100.00 Styrene
Tooling Gelcoat Process G3[1]	0.75	0.75	0.75	-	-		-		
Tooling Lamination Station L2[1]	-	-	-	-	-		-		
Closed Molding Process CM1[1]	-	-	-	-	-		-	-	-
Gelcoat Process G1B[1]	83.28[3]	83.28[3]	83.28[3]	-	-	25.88	-	25.88	25.88 Styrene
Lamination Process L1B[1]	-	-	-	-	-		-		
Roof Lamination Station L3[1]	-	-	-	-	-	9.5	-	9.5	9.5 Styrene
Specialty Gelcoat Station G4[1]	8.19	8.19	8.19	-	-	9.88	-	9.88	9.88 Styrene
Specialty Lamination Station L4	-	-	-	-	-	2.29	-	2.29	2.29 Styrene
Reinforced Plastic Composites Cleanup Operations	-	-	-	-	-	negligible	-	-	-
Fiberglass Grinding Booth GR1	12.82[3]	12.82[3]	12.82[3]	-	-	-	-	-	-
Fiberglass Grinding Booth GR2	12.82[3]	12.82[3]	12.82[3]	-	-	-	-	-	-
Building 2									
Pattern Shop Gelcoat G5[1]	1.19	1.19	1.19	-	-	1.45	-	1.45	1.45 Styrene
Wood Pattern Shop PS1[1]	6.11[3]	6.11[3]	6.11[3]	-	-	1.45	-	1.45	1.45 Styrene
Insignificant Activities									
Portable Grinding Deburring Operations	2.82	2.82	2.82	-	-	-	-	-	-
Welding Operations	0.23	0.23	0.23	-	-	-	-	0.09	0.09 Manganese
Portable Trimmers	2.82	2.82	2.82	-	-	-	-	-	-
Natural Gas Combustion	0.037	0.146	0.146	0.012	1.927	0.106	1.619	0.036	0.036 Hexane
Resin Storage Tank T1	-	-	-	-	-	0.03	-	0.03	0.03 Styrene
Paved/Unpaved Roads	3.09	0.68	0.68	-	-	-	-	-	-
Total PTE of Entire Source	**226.64**	**224.35**	**224.35**	**0.01**	**1.93**	**<250**	**1.62**	**251.27**	**251.14 Styrene**
Title V Major Source Thresholds	NA	100	100	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	NA	NA

*Under the Part 70 Permit program (40 CFR 70), PM10 and PM2.5, not particulate matter (PM), are each considered as a "regulated air pollutant".
[1]Resin and gel coats are limited to 249 tons per rolling twelve consecutive month period to render 326 IAC 2-2 not applicable.
[2]Limited based on BACT from Permit No. 113-16656-00074
[3]PM, PM10, PM2.5 limited to render 326 IAC 2-2 not applicable.

Federal Rule Applicability Determination

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

NSPS:

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

NESHAP:

(b) This new fiberglass grinding booth, identified as GR2, is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Reinforced Plastic Composites Production, Subpart WWWW because the new booth does not include cleaning, mixing, HAP-containing materials storage, and repair operations associated with the production of plastic composites as defined in 40 CFR 63.5785.

In Building 2, there is a wood pattern shop, identified as PS1. It is included in the descriptive information for NESHAP WWWW. The wood pattern shop does not use any resins or gel coatings as described in NESHAP WWWW. Therefore, the wood pattern shop is not subject to 40 CFR 63, Subpart WWWW. The wood pattern shop will be removed from the descriptive information in Section E.1.

This is a Type I change.

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

Complaince Assurance Monitoring (CAM)

(d) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to new or modified emission units that involve a pollutant-specific emission unit and meet the following criteria:

(1) has a potential to emit before controls equal to or greater than the Part 70 major source threshold for the pollutant involved;

(2) is subject to an emission limitation or standard for that pollutant; and

(3) uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.

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

CAM Applicability Analysis							
Emission Unit	**Control Device Used**	**Emission Limitation** (Y/N)	**Uncontrolled PTE** (ton/yr)	**Controlled PTE** (ton/yr)	**Part 70 Major Source Threshold** (ton/yr)	**CAM Applicable** (Y/N)	**Large Unit** (Y/N)
Fiberglass Grinding Booth GR2 -PM	Cartridge Filtration System	Y, 326 IAC 6-3-2	123.89	12.82	100	Y	N
Fiberglass Grinding Booth GR2 –PM10	Cartridge Filtration System	Y, 326 IAC 6-3-2	123.89	12.82	100	Y	N
Fiberglass Grinding Booth GR2 –PM2.5	Cartridge Filtration System	Y, 326 IAC 6-3-2	123.89	12.82	100	Y	N
Fiberglass Grinding Booth GR2 – all other criteria pollutants	None	-	-	-	-	-	-

Based on this evaluation, the requirements of 40 CFR Part 64, CAM are applicable to Fiberglass Grinding Booth GR2 for PM, PM10, and PM2.5 upon issuance of the Title V Renewal. A CAM plan must be submitted as part of the Renewal application.

State Rule Applicability Determination

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

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

(b) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The operation of Fiberglass Grinding Booth GR2 will emit less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year for a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

Griding Booth GR2

(c) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-2, the particulate emissions from the grinding booth GR2 shall not exceed 2.93 pounds per hour when operating at a process weight rate of 1,210 pounds (0.605 tons) per hour. The pound per hour limitation was 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:

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

The cartridge filter system shall be in operation at all times the grinding booth GR2 is in operation, in order to comply with this limit.

Compliance Determination and Monitoring Requirements

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

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

The Compliance Monitoring Requirements applicable to this modification are as follows:

Control	Parameter	Frequency	Range	Excursions and Exceedances
Grinding Booth GR2 cartridge filter system[(a)]	inspection	Quarterly	Normal-Abnormal	Response Steps

(a) These monitoring conditions are necessary because the cartridge filter system that controls particulate emissions from the grinding booth must operate properly to ensure compliance with 326 IAC 6-3-2(d) (Particulate Emission Limitations for Manufacturing Processes) and to render the requirements of 326 IAC 2-2 not applicable to this source.

Note: IDEM does not require internal visible emission or overspray observations on emission units that exhaust indoors and do not exhaust to an outdoor vent or stack. As a result, no visible emission or overspray observations are included for the new grinding booth GR2.

Grinding Booth GR1
Grinding booth GR1 is controlled by dry filters for particulate control which exhausts inside the building. It does not vent externally. The dry filters must operate properly to ensure compliance with 326 IAC 6-3-2(d) (Particulate Emission Limitations for Manufacturing Processes) and to render the requirements of 326 IAC 2-2 not applicable to this source. IDEM, OAQ does not require visible emission monitoring conditions for emission units that exhaust inside buildings. Therefore, the visible emissions notations requirements will be removed from the permit.

IDEM, OAQ does require a method of ensuring that the dry filters operate properly to ensure compliance with 326 IAC 6-3-2(d) and to render the requirements of 326 IAC 2-2 not applicable. As a result, the quarterly inspections currently required will continue to be required for the dry filters.

The removal of visible emission monitoring conditions is a Title I change.

Wood Pattern Shop PS1
Wood pattern shop PS1 is controlled by a high efficiency return-air cartridge system that is considered integral to the woodworking operation which exhausts inside the building. It does not vent externally. The return-air cartridge system must operate properly to ensure compliance with 326 IAC 6-3-2(d) (Particulate Emission Limitations for Manufacturing Processes) and to render the requirements of 326 IAC 2-2 not applicable to this source. IDEM, OAQ does not require visible emission monitoring conditions for emission units that exhaust inside buildings. Therefore, the visible emissions notations requirements will be removed from the permit.

IDEM, OAQ does require a method of ensuring that the return-air cartridge system does operate properly to ensure compliance with 326 IAC 6-3-2(d) and to render the requirements of 326 IAC 2-2 not applicable. As a result, the quarterly inspections currently required will continue to be required for the return-air cartridge system.

The removal of visible emission monitoring conditions is a Title I change.

There are no testing requirements associated with this source.

Proposed Changes

The changes listed below have been made to Part 70 Operating Permit No. 113-29976-00074. Deleted language appears as ~~strikethroughs~~ and new language appears in **bold**:

(a) Section A.3 has been updated to include descriptive information for the new grinding booth GR2. Subsequent numbering In Section A.3 after the new grinding booth has been updated as necessary. The numbering of the emission units in Sections D.1, D.3, and E.1 have been updated as necessary.

(b) The emission unit description for the new grinding booth GR2 has been added to Section D.2.

(c) Condition D.2.1 has been updated to include particulate emission limitations for the new grinding booth GR2 pursuant to 326 IAC 6-3-2.

(d) Condition D.2.2 has been updated to include PM, PM10, and PM2.5 limitations for the new grinding booth GR2 to render the requirements of 326 IAC 2-2 not applicable to the source.

(e) Condition D.2.4 has been updated to include the cartridge filtration system for grinding booth GR2 because the cartridge filtration system needs to operate in order to ensure compliance with Conditions D.2.1 and D.2.2.

(f) Condition D.2.5 has been updated to include monitor requirements for the new cartridge filtration system to ensure that the cartridge filtration system works properly.

(g) Condition D.2.6 was removed from the permit because IDEM, OAQ does not require visible emission notations for emission units that exhaust indoors.

(h) Condition D.2.7 has been updated to include documentation requirements for quarterly inspections of the new grinding booth GR2. Record keeping requirements for visible emission notations has been removed.

(i) Condition D.3.7 has been removed from the permit because IDEM, OAQ does not require visible emission notations for emission units that exhaust indoors.

(j) Condition D.3.8 has been updated to remove record keeping requirements for visible emission notations.

(k) The descriptive information for Section E.1 has been updated to remove the wood pattern shop, identified as PS1. The wood pattern shop is not an affected unit under 40 CFR Part 63, Subpart WWWW.

…

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

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

Building 1:

….

(h) One (1) grinding booth, identified as GR2, approved in 2014 for construction, consisting of grinders, diamond cutters, and various hand tools, utilizing a high efficiency cartridge filtration system for particulate control, exhausting inside the building, capacity: 1,210 pounds per hour.

Building 2:

~~(h)~~**(i)** One (1) Pattern gel coating station, identified as G5, approved for construction in 2013, equipped with air-assisted airless spray applicators, with a maximum capacity of 1.72

pounds of gel coat per hour, utilizing dry filters for particulate control, exhausting to Stack SV-7.

This gel coating process is considered an open molding process under 40 CFR 63, Subpart WWWW.

~~(i)~~**(j)** One (1) wood pattern shop, identified as PS1, approved for construction in 2013, with a maximum capacity of 400 pounds of wood per hour, utilizing a high efficiency return-air cartridge system for PM control considered as integral to the woodworking operation, exhausting indoors.

…

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

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

…

~~(h)~~**(i)** One (1) Pattern gel coating station, identified as G5, approved for construction in 2013, equipped with air-assisted airless spray applicators, with a maximum capacity of 1.72 pounds of gel coat per hour, utilizing dry filters for particulate control, exhausting to Stack SV-7.

…

…

SECTION D.2 FACILITY OPERATION CONDITIONS

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

(g) One (1) grinding booth, identified as GR1, constructed in 2000, consisting of grinders, diamond cutters, and various hand tools, utilizing dry filters for particulate control, exhausting inside the building, capacity: 1,210 pounds per hour.

(h) One (1) grinding booth, identified as GR2, approved in 2014 for construction, consisting of grinders, diamond cutters, and various hand tools, utilizing a high efficiency cartridge filtration system for particulate control, exhausting inside the building, capacity: 1,210 pounds per hour.

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

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

D.2.1 Particulate [326 IAC 6-3-2]

(a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emission rate from the grinding booth GR1 shall not exceed 2.93 pounds per hour when operating at a process weight rate of 1,210 pounds **(0.605 tons)** per hour.

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

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

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

(b) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emission rate from the grinding booth GR2 shall not exceed 2.93 pounds per hour when operating at a process weight rate of 1,210 pounds (0.605 tons) per hour.

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

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

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

D.2.2 PSD Minor Limit [326 IAC 2-2]

(a) In order to render 326 IAC 2-2 not applicable, the PM, PM10 and PM2.5 emission rate from the grinding booth GR1 shall be as follows:

(1) The PM emission rate after control shall not exceed 2.93 pounds per hour.

(2) The PM10 emission rate after control shall not exceed 2.93 pounds per hour.

(3) The PM2.5 emission rate after control shall not exceed 2.93 pounds per hour.

(b) In order to render 326 IAC 2-2 not applicable, the PM, PM10 and PM2.5 emission rate from the grinding booth GR2 shall be as follows:

(1) The PM emission rate after control shall not exceed 2.93 pounds per hour.

(2) The PM10 emission rate after control shall not exceed 2.93 pounds per hour.

(3) The PM2.5 emission rate after control shall not exceed 2.93 pounds per hour.

Compliance with ~~this~~ **these** limit**s**, combined with the limited PTE in Conditions D.1.2 and D.3.1 and the potential to emit from other emission units at this source, shall limit the source-wide total potential to emit PM, PM10 and PM2.5 to less than 250 tons per 12 consecutive month period and shall render 326 IAC 2-2 (PSD) not applicable.

…

D.2.4 Particulate Control [326 IAC 2-7-6(6)]

In order to comply with Conditions D.2.1 and D.2.2, the dry filters **and cartridge filtration system** for particulate control shall be in operation and control emissions from the grinding booth **GR1 and grinding booth GR2** at all times that the grinding booth **GR1 and grinding booth GR2** ~~is~~ **are** in operation**, respectively**.

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

D.2.5 Filter Inspections

(a) An inspection shall be performed each calendar quarter of all dry filters controlling the grinding booth **GR1**.

(b) An inspection shall be performed each calendar quarter of cartridge filtration system controlling the grinding booth GR2.

~~D.2.6 Visible Emissions Notations~~

(a) ~~Daily visible emission notations of the grinding booths, identified as GR1, stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.~~

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

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

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

~~(e) If abnormal emissions are observed, the Permittee shall take 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.~~

…

D.2.~~7~~**6** Record Keeping Requirements

…

~~(b) To document the compliance status with Condition D.2.6, the Permittee shall maintain daily records of the visible emission notations of the grinding booth, identified as GR1, stack exhaust. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of a visible emission notation, (i.e. the process did not operate that day).~~

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

…

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(14)]: Wood Pattern Shop Operations

~~(i)~~**(j)** One (1) wood pattern shop, identified as PS1, approved for construction in 2013, with a maximum capacity of 400 pounds of wood per hour, utilizing a high efficiency return-air cartridge system for PM control considered as integral to the woodworking operation, exhausting indoors.

…

…

D.3.6 Cartridge Failure Detection

In the event that cartridge failure has been observed:

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

~~D.3.7 Visible Emissions Notations~~

~~(a) Daily visible emission notations of the wood pattern shop, identified as PS1, stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.~~

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

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

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

~~(e) If abnormal emissions are observed, the Permittee shall take 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 Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.3.~~8~~**7** Record Keeping Requirements

(a) To document the compliance status with Condition D.3.5, the Permittee shall maintain records of the results of the inspections required under Condition D.3.5.

~~(b) To document the compliance status with Condition D.3.7, the Permittee shall maintain daily records of the visible emission notations of the wood pattern shop, identified as PS1, stack exhaust. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of a visible emission notation, (i.e. the process did not operate that day).~~

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

…

SECTION E.1 FACILITY OPERATION CONDITIONS

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

…

Building 2:

~~(h)~~**(i)** One (1) Pattern gel coating station, identified as G5, approved for construction in 2013, equipped with air-assisted airless spray applicators, with a maximum capacity of 1.72 pounds of gel coat per hour, utilizing dry filters for particulate control, exhausting to Stack SV-7.

This gel coating process is considered an open molding process under 40 CFR 63, Subpart WWWW.

~~(i) One (1) wood pattern shop, identified as PS1, approved for construction in 2013, with a maximum capacity of 400 pounds of wood per hour, utilizing a high efficiency return-air cartridge system for PM control considered as integral to the woodworking operation, exhausting indoors.~~

…

…

Upon further review, IDEM, OAQ has decided to make the following changes to the permit. Deleted language appears as ~~strikethrough~~ text and new language appears as **bold** text.

(a) IDEM clarified the following condition to indicate that the analog instrument must be capable of measuring the parameters outside the normal range.

(b) IDEM added "where applicable" to the lists in Section C - General Record Keeping Requirements to more closely match the underlying rule.

(c) IDEM is changing the Section C Compliance Monitoring Condition to clearly describe when new monitoring for new and existing units must begin.

(d) IDEM is also correcting the numbering typographical error contained in the title to

…

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.

~~(a)~~**(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 ~~or of initial start-up, whichever is later,~~ to begin such monitoring. If due to circumstances beyond the Permittee's control, any monitoring equipment required by this permit cannot be installed and operated no later than ninety (90) days after permit issuance ~~or the date of initial startup, whichever is later,~~ the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

…

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

~~(b)~~**(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.

~~(c)~~**(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.**

…

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**:

…

D.1.~~10~~**11** Reporting Requirements

…

Conclusion and Recommendation

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Source Modification No. 113-34924-00074 and Significant Permit Modification No. 113-35078-00074. The staff recommends to the Commissioner that this Part 70 Significant Source and Significant Permit Modification be approved.

IDEM Contact

(a) Questions regarding this proposed permit can be directed to Brandon Miller at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-5373 or toll free at 1-800-451-6027 extension 4-5373.

(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.

Emissions Calculations
Summary Emissions

Company Name: Structural Composites of Indiana, Inc.
Address City IN Zip: 1118 & 1116 Gerber Street, Ligonier, Indiana 46767
SSM No.: T 113-34924-00074
SPM No.: T 113-35078-00074
Review By: Brandon Miller
Date: October 28, 2014

Unlimited CRITERIA POLLUTANTS

Emission Units	PM	PM10	PM2.5	SO2	NOx	VOC	CO	Co2e	* Highest Single HAP	Combined HAP
Gelcoat Process G1	333.13	333.13	333.13	0.00	0.00	399.32	0.00	0.00	398.69	398.69
Gelcoat Process G1B	333.13	333.13	333.13	0.00	0.00	399.32	0.00	0.00	398.69	
Lamination Process L1	0.00	0.00	0.00	0.00	0.00	303.48	0.00	0.00	301.12	301.12
Lamination Process L1B	0.00	0.00	0.00	0.00	0.00	303.48	0.00	0.00	301.12	301.12
Mold Preparation PF1	0.00	0.00	0.00	0.00	0.00	0.33	0.00	0.00	0.00	0.00
Roof Gelcoat Process G2	9.20	9.20	9.20	0.00	0.00	11.03	0.00	0.00	11.01	11.01
Tooling Gelcoat Process G3	0.75	0.75	0.75	0.00	0.00	0.92	0.00	0.00	0.92	0.92
Tooling Lamination Station L2	0.00	0.00	0.00	0.00	0.00	0.93	0.00	0.00	0.93	0.93
Roof Lamination Station L3	0.00	0.00	0.00	0.00	0.00	9.50	0.00	0.00	9.50	9.50
Specialty Gelcoat Process G4	8.19	8.19	8.19	0.00	0.00	9.88	0.00	0.00	9.88	9.88
Specialty Lamination Station L4	0.00	0.00	0.00	0.00	0.00	2.29	0.00	0.00	2.29	2.29
Closed Molding Process CM1	0.00	0.00	0.00	0.00	0.00	0.06	0.00	0.00	0.00	0.00
Reinforced Plastic Composites Cleanup Operations	0.00	0.00	0.00	0.00	0.00	neg	0.00	0.00	0.00	0.00
Fiberglass Grinding Booth GR1	74.33	74.33	74.33	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Fiberglass Grinding Booth GR2	123.89	123.89	123.89	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Pattern Shop PS1	24.78	24.78	24.78	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Pattern Shop Gelcoat Process G5	1.19	1.19	1.19	0.00	0.00	1.45	0.00	0.00	1.45	1.45
le Grinding/Deburring Operations - Insignificant Acti	2.82	2.82	2.82	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Welding Operations - Insignificant Activity (b)	0.23	0.23	0.23	0.00	0.00	0.00	0.00	0.00	0.00	0.09
Portable Trimmers - Insignificant Activity (c)	2.82	2.82	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Paved/Unpaved Roads - Insignificant Activity Item (d	3.09	0.68	0.68	0.00	0.00	0.00	0.00	0.00	0.00	0.00
atural Gas Combustion - Insignificant Activity Item (	0.04	0.15	0.01	0.01	1.93	0.11	1.62	2,326.71	0.00	0.04
Resin Tank T1 (Tanks 4.0.9d)	0.00	0.00	0.00	0.00	0.00	0.03	0.00	0.00	0.03	0.03
TOTALS	**917.58**	**915.28**	**912.34**	**0.01**	**1.93**	**1,442.13**	**1.62**	**2,326.71**	**1,435.64**	**1,037.07**

Note: *Styrene as Determined Below

HAZARDOUS AIR POLLUTANTS

Emission Units	Benzene Emissions (ton/yr)	Cadmium Emissions (ton/yr)	Chromium Emissions (ton/yr)	Dichloro-Benzene Emissions (ton/yr)	Ethyl Benzene Emissions (ton/yr)	Formalde-hyde Emissions (ton/yr)	Hexane Emissions (ton/yr)	Isocyante Compound Emissions (ton/yr)	Lead Emissions (ton/yr)	Manganese Emissions (ton/yr)	Nickel Emissions (ton/yr)	Styrene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Xylene Emissions (ton/yr)	Total HAP Emissions (ton/yr)
Gelcoat Process G1	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	398.69	0.00	0.00	398.69
Gelcoat Process G1B	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	398.69	0.00	0.00	398.69
Lamination Process L1	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	301.12	0.00	0.00	301.12
Lamination Process L1B	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	301.12	0.00	0.00	301.12
Mold Preparation PF1	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Roof Gelcoat Process G2	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	11.01	0.00	0.00	11.01
Tooling Gelcoat Process G3	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.92	0.00	0.00	0.92
Tooling Lamination Station L2	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.93	0.00	0.00	0.93
Roof Lamination Station L3	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	9.50	0.00	0.00	9.50
Specialty Gelcoat Process G4	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	9.88	0.00	0.00	9.88
Specialty Lamination Station L4	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	2.29	0.00	0.00	2.29
Closed Molding Process CM1	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Reinforced Plastic Composites Cleanup Operations	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Fiberglass Grinding Booth GR1	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Fiberglass Grinding Booth GR2	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Pattern Shop PS1	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Pattern Shop Gelcoat Process G5	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1.45	0.00	0.00	1.45
le Grinding/Deburring Operations - Insignificant Acti	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Welding Operations - Insignificant Activity (b)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.09	0.00	0.00	0.00	0.00	0.09
Portable Trimmers - Insignificant Activity (c)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Paved/Unpaved Roads - Insignificant Activity Item (d	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
atural Gas Combustion - Insignificant Activity Item (	4.05E-05	2.12E-05	2.70E-05	2.31E-05	0.00	1.45E-03	0.03	0.00	9.64E-06	7.32E-06	4.05E-05	0.00	6.55E-05	0.00	0.036
Resin Tank T1 (Tanks 4.0.9d)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.03	0.00	0.00	0.03
Total Emissions (TPY) by HAP	**4.05E-05**	**2.12E-05**	**2.70E-05**	**2.31E-05**	**0.00**	**1.45E-03**	**0.03**	**0.00**	**9.64E-06**	**0.09**	**4.05E-05**	**1,435.64**	**6.55E-05**	**0.00**	**1,435.76**

Emissions Calculations
Summary Emissions (Limits)

Company Name: Structural Composites of Indiana, Inc.
Address City IN Zip: 1118 & 1116 Gerber Street, Ligonier, Indiana 46767
SSM No.: T 113-34924-00074
SPM No.: T 113-35078-00074
Review By: Brandon Miller
Date: October 28, 2014

LIMITED/CONTROLLED CRITERIA POLLUTANTS

Emission Units	PM	PM10	PM2.5	SO2	NOx	VOC		CO	Co2e	Highest Single HAP	Combined HAP
Gelcoat Process G1	83.28	83.28	83.28	0.00	0.00	100.00	249.00	0.00	0.00	100.00	100.00
Lamination Process L1	0.00	0.00	0.00	0.00	0.00			0.00	0.00		
Mold Preparation PF1	0.00	0.00	0.00	0.00	0.00			0.00	0.00		
Roof Gelcoat Process G2	9.20	9.20	9.20	0.00	0.00	100.00		0.00	0.00	100.00	100.00
Tooling Gelcoat Process G3	0.75	0.75	0.75	0.00	0.00			0.00	0.00		
Tooling Lamination Station L2	0.00	0.00	0.00	0.00	0.00			0.00	0.00		
Closed Molding Process CM1	0.00	0.00	0.00	0.00	0.00			0.00	0.00	2.11	2.11
Gelcoat Process G1B	83.28	83.28	83.28	0.00	0.00	25.88		0.00	0.00	25.88	25.88
Lamination Process L1B	0.00	0.00	0.00	0.00	0.00			0.00	0.00		
Roof Lamination Station L3	0.00	0.00	0.00	0.00	0.00	9.50		0.00	0.00	9.50	9.50
Specialty Gelcoat Process G4	8.19	8.19	8.19	0.00	0.00	9.88		0.00	0.00	9.88	9.88
Specialty Lamination Station L4	0.00	0.00	0.00	0.00	0.00	2.29		0.00	0.00	2.29	2.29
Pattern Shop PS1	6.11	6.11	6.11	0.00	0.00	0.00		0.00	0.00	0.00	0.00
Pattern Shop Gelcoat Process G5	1.19	1.19	1.19	0.00	0.00	1.45		0.00	0.00	1.45	1.45
Reinforced Plastic Composites Cleanup Operations	0.00	0.00	0.00	0.00	0.00	neg	neg	0.00	0.00	0.00	0.00
Fiberglass Grinding Booth GR1	12.82	12.82	12.82	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Fiberglass Grinding Booth GR2	12.82	12.82	12.82	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
le Grinding/Deburring Operations - Insignificant Acti	2.82	2.82	2.82	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Welding Operations - Insignificant Activity (b)	0.23	0.23	0.23	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.09
Portable Trimmers - Insignificant Activity (c)	2.82	2.82	2.82	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Paved/Unpaved Roads - Insignificant Activity Item (c	3.09	0.68	0.68	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
atural Gas Combustion - Insignificant Activity Item (	0.037	0.146	0.146	0.012	1.927	0.106	0.106	1.619	2,326.71	neg	0.036
Resin Tank RT1 (Tanks 4.0.9d)	0.00	0.00	0.00	0.00	0.00	0.03	0.03	0.00	0.00	0.03	0.03
TOTALS	**226.64**	**224.35**	**224.35**	**0.01**	**1.93**	**<250**	**249.14**	**1.62**	**2,326.71**	**251.14**	**251.27**

Note: Highlighted in yellow are new units.

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

Company Name: Structural Composites of Indiana, Inc.
Address City IN Zip: 1118 & 1116 Gerber Street, Ligonier, Indiana 46767
SSM No.: T 113-34924-00074
SPM No.: T 113-35078-00074
Review By: Brandon Miller
Date: October 28, 2014

Gelcoat Process G1 - A.2(a)(1)

Material	Density (Lb/Gal)	Weight % Styrene Monomer or VOC*	Weight % Solids	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Ton Processed per hour	Subpart WWWW Allowable Emission Factor (lb/ton)*	Potential VOC pounds per hour	Potential Pounds of VOC per day		Particulate Potential (ton/yr)	Transfer Efficiency**
Production Gelcoat - Other Pigmented	10.95	37.00%	63.00%	0.8400	52.50	0.24145	377.00	91.03	2184.62	398.69	333.13	75%
MEKP (Hardener)	8.34	2.00%	0.00%	0.0165	52.50	0.00361	40.00	0.14	3.47	0.63	0.00	75%
Total This Emission Unit								**91.18**	**2188.08**	**399.32**	**333.13**	
									Total after 75% control		**83.28**	

**Air Assisted Airless Application, 75% Transfer Efficient

Gelcoat Process G1B - A.2(a)(1) (2013)

Material	Density (Lb/Gal)	Weight % Styrene Monomer or VOC*	Weight % Solids	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Ton Processed per hour	Subpart WWWW Allowable Emission Factor (lb/ton)*	Potential VOC pounds per hour	Potential Pounds of VOC per day	Potential VOC tons per year	Particulate Potential (ton/yr)	Transfer Efficiency**
Production Gelcoat - Other Pigmented	10.95	37.00%	63.00%	0.8400	52.50	0.24145	377.00	91.03	2184.62	398.69	333.13	75%
MEKP (Hardener)	8.34	2.00%	0.00%	0.0165	52.50	0.00361	40.00	0.14	3.47	0.63	0.00	75%
Total This Emission Unit								**91.18**	**2188.08**	**399.32**	**333.13**	
									Total after 75% control		**83.28**	

**Air Assisted Airless Application, 75% Transfer Efficient

Lamination Process L1 - A.2(a)(2)

Material	Density (Lb/Gal)	Weight % Styrene Monomer or VOC*	Weight % Solids	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Ton Processed per hour	Subpart WWWW/ BACT Allowable Emission Factor (lb/ton)*	Potential VOC pounds per hour	Potential Pounds of VOC per day	Potential VOC tons per year	Particulate Potential (ton/yr)	Transfer Efficiency**
Production Resin - Non-CR/HS	9.40	35.00%	65.00%	3.8300	49.60	0.89285	77.00	68.75	1649.99	301.12	0.00	100%
MEKP (Hardener)	8.34	2.00%	0.00%	0.0648	49.60	0.01340	40.00	0.54	12.87	2.35	0.00	100%
Total This Emission Unit								**69.29**	**1662.85**	**303.48**	**0.00**	

**Flow Coater Application - Mechanical Non-Atomized Application

Lamination Process L1B- A.2(a)(2) (2013)

Material	Density (Lb/Gal)	Weight % Styrene Monomer or VOC*	Weight % Solids	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Ton Processed per hour	Subpart WWWW/ BACT Allowable Emission Factor (lb/ton)*	Potential VOC pounds per hour	Potential Pounds of VOC per day	Potential VOC tons per year	Particulate Potential (ton/yr)	Transfer Efficiency**
Production Resin - Non-CR/HS	9.40	35.00%	65.00%	3.8300	49.60	0.89285	77.00	68.75	1649.99	301.12	0.00	100%
MEKP (Hardener)	8.34	2.00%	0.00%	0.0648	49.60	0.01340	40.00	0.54	12.87	2.35	0.00	100%
Total This Emission Unit								**69.29**	**1662.85**	**303.48**	**0.00**	

**Flow Coater Application - Mechanical Non-Atomized Application

Roof Gelcoat Process G2 - A.2(c)

Material	Density (Lb/Gal)	Weight % Styrene Monomer or VOC*	Weight % Solids	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Ton Processed per hour	Subpart WWWW/ BACT Allowable Emission Factor (lb/ton)*	Potential VOC pounds per hour	Potential Pounds of VOC per day	Potential VOC tons per year	Particulate Potential (ton/yr)	Transfer Efficiency**
Production Gelcoat - Other Pigmented	11.98	37.00%	63.00%	3.7100	0.30	0.00667	377.00	2.51	60.32	11.01	9.20	75%
MEKP (Hardener)	8.34	2.00%	0.00%	0.0799	0.30	0.00010	40.00	0.00	0.10	0.02	0.00	75%
Total This Emission Unit								**2.52**	**60.42**	**11.03**	**9.20**	

**Air Assisted Airless Application, 75% Transfer Efficient

Roof Lamination Process L3- A.2 (c) (2013)

Material	Density (Lb/Gal)	Weight % Styrene Monomer or VOC*	Weight % Solids	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Ton Processed per hour	Subpart WWWW/ BACT Allowable Emission Factor (lb/ton)*	Potential VOC pounds per hour	Potential Pounds of VOC per day	Potential VOC tons per year	Particulate Potential (ton/yr)	Transfer Efficiency**
Production Resin - Non-CR/HS	9.40	35.00%	65.00%	21.2372	0.28	0.02795	77.00	2.15	51.65	9.43	0.00	100%
MEKP (Hardener)	8.34	2.00%	0.00%	0.3620	0.28	0.00042	40.00	0.02	0.41	0.07	0.00	100%
Total This Emission Unit								**2.17**	**52.05**	**9.50**	**0.00**	

**Flow Coater Application - Mechanical Non-Atomized Application

Continue to the next page
Continue from the previous page

Tooling Gelcoat Process G3 - A.2(d)

Material	Density (Lb/Gal)	Weight % Styrene Monomer or VOC*	Weight % Solids	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Ton Processed per hour	Subpart WWWW/ BACT Allowable Emission Factor (lb/ton)*	Potential VOC pounds per hour	Potential Pounds of VOC per day	Potential VOC tons per year	Particulate Potential (ton/yr)	Transfer Efficiency**
Production Gelcoat - Other Pigmented	9.07	38.00%	62.00%	0.5770	0.21	0.00055	377.00	0.21	4.97	0.91	0.75	75%
MEKP (Hardener)	8.34	2.00%	0.00%	0.0799	0.21	0.00007	40.00	0.00	0.07	0.01	0.00	75%
Total This Emission Unit								**0.21**	**5.04**	**0.92**	**0.75**	

**Air Assisted Airless Application, 75% Transfer Efficient

Tooling Lamination Process L2

Material	Density (Lb/Gal)	Weight % Styrene Monomer or VOC*	Weight % Solids	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Ton Processed per hour	Subpart WWWW/ BACT Allowable Emission Factor (lb/ton)*	Potential VOC pounds per hour	Potential Pounds of VOC per day	Potential VOC tons per year	Particulate Potential (ton/yr)	Transfer Efficiency**
Production Resin - Non-CR/HS	10.85	35.00%	65.00%	2.4990	0.20	0.00271	77.00	0.21	5.01	0.91	0.00	100%
MEKP (Hardener)	8.34	2.00%	0.00%	0.0648	0.20	0.00005	40.00	0.00	0.05	0.01	0.00	100%
Total This Emission Unit								**0.22**	**5.06**	**0.93**	**0.00**	

**Flow Coater Application - Mechanical Non-Atomized Application

Specialt Gelcoat Process G4 (2013)

Material	Density (Lb/Gal)	Weight % Styrene Monomer or VOC*	Weight % Solids	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Ton Processed per hour	Subpart WWWW/ BACT Allowable Emission Factor (lb/ton)*	Potential VOC pounds per hour	Potential Pounds of VOC per day	Potential VOC tons per year	Particulate Potential (ton/yr)	Transfer Efficiency**
Production Gelcoat - Other Pigmented	11.98	37.00%	63.00%	0.8400	1.18	0.00594	377.00	2.24	53.72	9.80	8.19	75%
MEKP (Hardener)	8.34	2.00%	0.00%	0.0799	1.18	0.00039	40.00	0.02	0.38	0.07	0.00	75%
Total This Emission Unit								**2.25**	**54.10**	**9.88**	**8.19**	

**Air Assisted Airless Application, 75% Transfer Efficient

Specialty Lamination Process L4 (2013)

Material	Density (Lb/Gal)	Weight % Styrene Monomer or VOC*	Weight % Solids	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Ton Processed per hour	Subpart WWWW/ BACT Allowable Emission Factor (lb/ton)*	Potential VOC pounds per hour	Potential Pounds of VOC per day	Potential VOC tons per year	Particulate Potential (ton/yr)	Transfer Efficiency**
Production Resin - Non-CR/HS	9.40	35.00%	65.00%	3.8300	0.37	0.00671	77.00	0.52	12.41	2.26	0.00	100%
MEKP (Hardener)	8.34	2.00%	0.00%	0.0648	0.37	0.00010	40.00	0.00	0.10	0.02	0.00	100%
Total This Emission Unit								**0.53**	**12.50**	**2.29**	**0.00**	

**Flow Coater Application - Mechanical Non-Atomized Application

Pattern Shop Gelcoat Process G5 (2013)

Material	Density (Lb/Gal)	Weight % Styrene Monomer or VOC*	Weight % Solids	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Ton Processed per hour	Subpart WWWW/ BACT Allowable Emission Factor (lb/ton)*	Potential VOC pounds per hour	Potential Pounds of VOC per day	Potential VOC tons per year	Particulate Potential (ton/yr)	Transfer Efficiency**
Production Gelcoat - Other Pigmented	11.98	37.00%	63.00%	0.5770	0.25	0.00086	377.00	0.33	7.82	1.43	1.19	75%
MEKP (Hardener)	8.34	2.00%	0.00%	0.0799	0.25	0.00008	40.00	0.00	0.08	0.01	0.00	75%
Total This Emission Unit								**0.33**	**7.90**	**1.45**	**1.19**	

**Air Assisted Airless Application, 75% Transfer Efficient

Source Wide Cleanup Operations

Material	Density (Lb/Gal)	Weight % Styrene Monomer or VOC	Weight % Solids	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Ton Processed per hour	Emission Factor	Potential VOC pounds per hour	Potential Pounds of VOC per day	Potential VOC tons per year	Particulate Potential (ton/yr)	Transfer Efficiency
Acetone - Cleanup Solvent	6.61	0.00%	0.00%	0.4000	21.750	0.02875	0.00	0.00	0.00	0.00	0.00	100%

METHODOLOGY
Tons Processed per Hour (tons/hr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * 1/2,000 (lb/ton)
Potential VOC Pounds per Hour (lb VOC/hr) = Tons Processed (tons/hr) * Emission Factor (lb/ton)
Potential VOC Pounds per Day (lb VOC/day) = Potential VOC (lb VOC/hr) * 24 (hr/day)
Potential VOC Tons per Year (tpy) = Potential VOC (lb VOC/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (Weight % Solids) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)

NOTES
*Emission factors are based on the Highest Allowable Emission Rate of 40 CFR § 63, Subpart WWWW, Table 3 for Existing Open Molding Operations or the Best Available Control Technology (BACT) Limits Established in MSOP113-11385-
Emissions for MEKP are based upon the VOC content as MEK (maximum 2%) and PM/PM10 as 0% Solids by Weight

Appendix A: Emissions Calculations

From Surface Coating Operations - Mold Preparation (PF1)

Company Name: Structural Composites of Indiana, Inc.
Address City IN Zip: 1118 & 1116 Gerber Street, Ligonier, Indiana 46767
SSM No.: T 113-34924-00074
SPM No.: T 113-35078-00074
Review By: Brandon Miller
Date: October 28, 2014

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency*
Mold Release Agent	7.43	100.00%	0.00%	100.00%	0.00%	0.00%	0.010	1.00	7.43	7.43	0.07	1.78	0.33	0.00	0.00	100%
Acetone	6.61	100.00%	100.00%	0.00%	100.00%	0.00%	0.100	1.00	0.00		0.00	0.00	0.00	0.00	0.00	100%
Potential Emissions											**0.07**	**1.78**	**0.33**	**0.00**		

METHODOLOGY

*Transfer Efficiency = 100% as Hand Wiping Operations
Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
These materials do not contain hazardous air pollutants

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

Company Name: Structural Composites of Indiana, Inc.
Address City IN Zip: 1118 & 1116 Gerber Street, Ligonier, Indiana 46767
SSM No.: T 113-34924-00074
SPM No.: T 113-35078-00074
Review By: Brandon Miller
Date: October 28, 2014

Closed molding process

Material	Density (Lb/Gal)	Weight % Styrene Monomer or VOC*	Weight % Solids	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Ton Processed per hour	AP-42 Emission Factor (lb/ton)*	Potential VOC pounds per hour	Potential Pounds of VOC per day	Potential VOC tons per year	Particulate Potential (ton/yr)	Transfer Efficiency**
Production Resin - Non-CR/HS	9.17	35.00%	65.00%	5.0100	1.00	0.02297	21.00	0.48	11.58		0.00	100%
MEKP (Hardener)	8.34	2.00%	0.00%	0.0826	1.00	0.00034	40.00	0.01	0.33	0.06	0.00	100%
Total This Emission Unit								**0.49**	**11.91**	**0.06**	**0.00**	

**Resin Transfer Molding, Non-Atomized Application

Cleanup Operations

Material	Density (Lb/Gal)	Weight % Styrene Monomer or VOC	Weight % Solids	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Ton Processed per hour	Emission Factor	Potential VOC pounds per hour	Potential Pounds of VOC per day	Potential VOC tons per year	Particulate Potential (ton/yr)	Transfer Efficiency
Acetone - Cleanup Solvent	6.61	0.00%	0.00%	0.1000	1.000	0.00033	0.00	0.0000	0.00	0.00	0.00	100%

METHODOLOGY

Tons Processed per Hour (tons/hr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * 1/2,000 (lb/ton)
Potential VOC Pounds per Hour (lb VOC/hr) = Tons Processed (tons/hr) * Emission Factor (lb/ton)
Potential VOC Pounds per Day (lb VOC/day) = Potential VOC (lb VOC/hr) * 24 (hr/day)
Potential VOC Tons per Year (tpy) = Potential VOC (lb VOC/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (Weight % Solids) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)

NOTES

*Emission factors are based on AP-42 for Closed Molding Operations; Emission Estimate is 3% Loss of the Total Monomer Content
Emissions for MEKP are based upon the VOC content as MEK (maximum 2%) and PM/PM10 as 0% Solids by Weight

Emission Calculations
Particulate Matter Emission Sources

Company Name: Structural Composites of Indiana, Inc.
Address City IN Zip: 1118 & 1116 Gerber Street, Ligonier, Indiana 46767
SSM No.: T 113-34924-00074
SPM No.: T 113-35078-00074
Review By: Brandon Miller
Date: October 28, 2014

Unit ID/Control Device	Maximum Process Throughput Rate (lb/hr)	Allowable Emission Rate	Control Efficiency (%)	Grain Loading per Actual Cubic foot of Outlet Air (grains/cub. ft.)	Gas or Air Flow Rate (acfm.)	PM Emission Rate before Controls (lb/hr)	PM Emission Rate before Controls (tons/yr)	PM Emission Rate after Controls (lb/hr)	PM Emission Rate after Controls (tons/yr)
A.2(g) - One (1) Fiberglass Grinding Booth GR1	1,210	2.928	99.00%	0.003	6,600	16.97	74.33	0.170	0.74
Total PTE							74.33		0.74

Methodology
Allowable Emission Rate for Processes <30 tons/hr = 4.1 x Process Weight (tons/hr) ^ 0.67
Emission Rate in lbs/hr (after controls) = (grains/cub. ft.) (cub. ft./min.) (60 min/hr) (lb/7000 grains)
Emission Rate in tons/yr = (lbs/hr) (8760 hr/yr) (ton/2000 lb)

Emission Rate in lbs/hr (before controls) = Emission Rate (after controls): (lbs/hr)/(1-control efficiency)
Emission Rate in tons/yr = (lbs/hr) (8760 hr/yr) (ton/2000 lb)

Emission Calculations
Particulate Matter Emission Sources

Company Name: Structural Composites of Indiana, Inc.
Address City IN Zip: 1118 & 1116 Gerber Street, Ligonier, Indiana 46767
SSM No.: T 113-34924-00074
SPM No.: T 113-35078-00074
Review By: Brandon Miller
Date: October 28, 2014

Unit ID/Control Device	Maximum Process Throughput Rate (lb/hr)	Allowable Emission Rate	Control Efficiency (%)	Grain Loading per Actual Cubic foot of Outlet Air (grains/cub. ft.)	Gas or Air Flow Rate (acfm.)	PM Emission Rate before Controls (lb/hr)	PM Emission Rate before Controls (tons/yr)	PM Emission Rate after Controls (lb/hr)	PM Emission Rate after Controls (tons/yr)
A.2(h) - One (1) Fiberglass Grinding Booth GR2	1,210	2.928	99.00%	0.003	11,000	28.29	123.89	0.283	1.24
Total PTE							123.89		1.24

Methodology
Allowable Emission Rate for Processes <30 tons/hr = 4.1 x Process Weight (tons/hr) ^ 0.67
Emission Rate in lbs/hr (after controls) = (grains/cub. ft.) (cub. ft./min.) (60 min/hr) (lb/7000 grains)
Emission Rate in tons/yr = (lbs/hr) (8760 hr/yr) (ton/2000 lb)

Emission Rate in lbs/hr (before controls) = Emission Rate (after controls): (lbs/hr)/(1-control efficiency)
Emission Rate in tons/yr = (lbs/hr) (8760 hr/yr) (ton/2000 lb)
PM2.5 and PM10 are assumed to equal PM emissions

Emission Calculations
Insignificant Particulate Matter Emission Sources

Company Name: Structural Composites of Indiana, Inc.
Address City IN Zip: 1118 & 1116 Gerber Street, Ligonier, Indiana 46767
SSM No.: T 113-34924-00074
SPM No.: T 113-35078-00074
Review By: Brandon Miller
Date: October 28, 2014

PS1 Equipment List

5 Axis CNC	1
3 Axis CNC	1
Radial Arm Saw	1
Table Saw	1
Band Saw	2
Drill Press	1
Plainer	1
Disc Sander	1
Edge Sander	1
Spindle Sander	1

Unit ID/Control Device	Maximum Process Throughput Rate (lb/hr)	Control Efficiency (%)	Grain Loading per Actual Cubic foot of Outlet Air (grains/cub. ft.)	Gas or Air Flow Rate (acfm.)	PM Emission Rate before Controls (lb/hr)	PM Emission Rate before Controls (tons/yr)	PM Emission Rate after Controls (lb/hr)	PM Emission Rate after Controls (tons/yr)
A.2(h) - PS1 Woodworking Operations	400	98.00%	0.003	4,400	5.66	24.78	0.113	0.50

Methodology

Emission Rate in lbs/hr (after controls) = (grains/cub. ft.) (cub. ft./min.) (60 min/hr) (lb/7000 grains)
Emission Rate in tons/yr = (lbs/hr) (8760 hr/yr) (ton/2000 lb)

Emission Rate in lbs/hr (before controls) = Emission Rate (after controls): (lbs/hr)/(1-control efficiency)
Emission Rate in tons/yr = (lbs/hr) (8760 hr/yr) (ton/2000 lb)

Unit ID/Control Device	Maximum Process Throughput Rate (lb/hr)	Allowable Emission Rate (lb/hr)	Allowable Emission Rate (tons/yr)
A.2(h) - PS1 Woodworking Operations	400	1.395	6.11

Methodology
Allowable Emission Rate for Processes <30 tons/hr = 4.1 x Process Weight (tons/hr) ^ 0.67

Emission Calculations
Insignificant Particulate Matter Emission Sources - IA(a)

Company Name: Structural Composites of Indiana, Inc.
Address City IN Zip: 1118 & 1116 Gerber Street, Ligonier, Indiana 46767
SSM No.: T 113-34924-00074
SPM No.: T 113-35078-00074
Review By: Brandon Miller
Date: October 28, 2014

Unit ID/Control Device	Maximum Process Throughput Rate (lb/hr)	Allowable Emission Rate	Control Efficiency (%)	Grain Loading per Actual Cubic foot of Outlet Air (grains/cub. ft.)	Gas or Air Flow Rate (acfm.)	PM Emission Rate before Controls (lb/hr)	PM Emission Rate before Controls (tons/yr)	PM Emission Rate after Controls (lb/hr)	PM Emission Rate after Controls (tons/yr)
A.3(a) - Portable Grinding/Deburring Operations	1,210	2.928	98.00%	0.003	500	0.64	2.82	0.013	0.06
A.3(c) - Trimming Operations	1,210	2.928	98.00%	0.003	500	0.64	2.82	0.013	0.06

Methodology
Allowable Emission Rate for Processes <30 tons/hr = 4.1 x Process Weight (tons/hr) ^ 0.67
Emission Rate in lbs/hr (after controls) = (grains/cub. ft.) (cub. ft./min.) (60 min/hr) (lb/7000 grains)
Emission Rate in tons/yr = (lbs/hr) (8760 hr/yr) (ton/2000 lb)

Emission Rate in lbs/hr (before controls) = Emission Rate (after controls): (lbs/hr)/(1-control efficiency)
Emission Rate in tons/yr = (lbs/hr) (8760 hr/yr) (ton/2000 lb)

Appendix A: Emissions Calculations
Welding and Thermal Cutting

Company Name: Structural Composites of Indiana, Inc.
Address City IN Zip: 1118 & 1116 Gerber Street, Ligonier, Indiana 46767
SSM No.: T 113-34924-00074
SPM No.: T 113-35078-00074
Review By: Brandon Miller
Date: October 28, 2014

PROCESS	Number of Stations	Max. electrode or carbon steel consumption per station (lbs/hr)	Electrode Usage (lb/hr)	EMISSION FACTORS* (lb pollutant/lb electrode or carbon steel)				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
WELDING				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
SMAW (Stick) E6010	2.00	1.00	2.00	2.56E-02	9.81E-03	4.00E-05	3.00E-05	5.12E-02	1.96E-02	8.00E-05	6.00E-05	1.98E-02
	Number of Stations	Max. Metal Thickness Cut (in.)	Max. Metal Cutting Rate (in./minute)	EMISSION FACTORS (lb pollutant/1,000 inches cut, 1" thick)**				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
FLAME CUTTING				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
Oxyacetylene Torch	1.00	0.250	10.0	3.90E-03	0.00E+00	0.00E+00	0.00E+00	2.34E-03	0.00E+00	0.00E+00	0.00E+00	0.00E+00
EMISSION TOTALS												
Potential Emissions lbs/hr								0.05	0.02	0.00008	0.00006	0.02
Potential Emissions lbs/day								1.28	0.47	0.0019	0.0014	0.47
Potential Emissions tons/year								0.23	0.09	0.0004	0.0003	0.09

METHODOLOGY

*Emission Factors are default values for carbon steel unless a specific electrode type is noted in the Process column.
Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used)
Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day
Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/year x 1 ton/2,000 lbs.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100

Company Name: Structural Composites of Indiana, Inc.
Address City IN Zip: 1118 & 1116 Gerber Street, Ligonier, Indiana 46767
SSM No.: T 113-34924-00074
SPM No.: T 113-35078-00074
Review By: Brandon Miller
Date: October 28, 2014

Emission Unit Description	Emission Unit ID	Heat Input Capacity MMBtu/hr	Emission Unit Description	Emission Unit ID	Heat Input Capacity MMBtu/hr
Space Heater (e)(1)	SH1	0.030	Radiant Heater (e)(3)	RH1	0.150
Space Heater (e)(1)	SH2	0.030	Radiant Heater (e)(3)	RH2	0.150
Space Heater (e)(1)	SH3	0.030	Radiant Heater (e)(3)	RH3	0.150
Space Heater (e)(1)	SH4	0.030	Oven	OH1	0.225
Space Heater (e)(1)	SH5	0.030			
Air Makeup Unit (e)(2)	AM1	3.575			

Heat Input Capacity MMBtu/hr	4.400	Potential Throughput MMCF/yr	38.54

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.90	7.60	0.600	100 **see below	5.50	84.0
Potential Emission in tons/yr	0.037	0.146	0.012	1.93	0.106	1.62

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology
All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	0.002	0.001	0.075	1.80	0.003
Potential Emission in tons/yr	0.00004	0.000023	0.0014	0.035	0.00007

	HAPs - Metals					
	Lead	Cadmium	Chromium	Manganese	Nickel	Total HAPs
Emission Factor in lb/MMcf	0.0005	0.001	0.001	0.0004	0.002	
Potential Emission in tons/yr	0.000010	0.000021	0.000027	0.000007	0.00004	0.036

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.

	Greenhouse Gas		
	CO2	CH4	N2O
Emission Factor in lb/MMcf	120,000	2.3	2.2
Potential Emission in tons/yr	2,313	0.0	0.0
Summed Potential Emissions in tons/yr	2,313		
CO2e Total in tons/yr	2,327		

Methodology
The N2O Emission Factor for uncontrolled is 2.2. The N2O Emission Factor for low NOx burner is 0.64.
Emission Factors are from AP 42, Table 1.4-2 SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03.
Global Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP

VOC Emissions Associated with Storage Tank
One (1) Polyester Resin Storage Tank (T-1)

Company Name: Structural Composites of Indiana, Inc.
Address City IN Zip: 1118 & 1116 Gerber Street, Ligonier, Indiana 46767
SSM No.: T 113-34924-00074
SPM No.: T 113-35078-00074
Review By: Brandon Miller
Date: October 28, 2014

Annual Throughput	12,000	Gallons/Year
Tank Capacity	6,000	Gallons
Maximum Tank Turns	2.00	
Tank Diameter	10	Feet
Tank Height	10.2	Feet

Methodology

Tanks 4.0.9d Below

TANKS 4.0 Report Page 1 of 4

TANKS 4.0.9d
Emissions Report - Summary Format
Tank Indentification and Physical Characteristics

Identification

User Identification:	T-1
City:	Ligonier
State:	Indiana
Company:	Structural Composites of Indiana, Inc.
Type of Tank:	Vertical Fixed Roof Tank
Description:	One (1) 6,000 Gallon Polyester Resin Tank

Tank Dimensions

Shell Height (ft):	10.20
Diameter (ft):	10.00
Liquid Height (ft) :	10.00
Avg. Liquid Height (ft):	8.00
Volume (gallons):	6,000.00
Turnovers:	142.79
Net Throughput(gal/yr):	856,728.00
Is Tank Heated (y/n):	N

Paint Characteristics

Shell Color/Shade:	Red/Primer
Shell Condition	Good
Roof Color/Shade:	Red/Primer
Roof Condition:	Good

Roof Characteristics

Type:	Dome
Height (ft)	0.50
Radius (ft) (Dome Roof)	10.00

Breather Vent Settings

Vacuum Settings (psig):	-0.03
Pressure Settings (psig)	0.03

Meterological Data used in Emissions Calculations: Fort Wayne, Indiana (Avg Atmospheric Pressure = 14.31 psia)

TANKS 4.0 Report Page 2 of 4

TANKS 4.0.9d
Emissions Report - Summary Format
Liquid Contents of Storage Tank

T-1 - Vertical Fixed Roof Tank
Ligonier, Indiana

Mixture/Component	Month	Daily Liquid Surf. Temperature (deg F) Avg.	Min.	Max.	Liquid Bulk Temp (deg F)	Vapor Pressure (psia) Avg.	Min.	Max.	Vapor Mol. Weight	Liquid Mass Fract.	Vapor Mass Fract.	Mol. Weight	Basis for Vapor Pressure Calculations
Styrene	All	60.92	49.00	71.95	54.23	0.0742	0.0469	0.1000	104.1500			104.15	Option 2: A=7.14, B=1574.51, C=224.09

TANKS 4.0 Report Page 3 of 4

TANKS 4.0.9d
Emissions Report - Summary Format
Individual Tank Emission Totals

Emissions Report for: Annual

T-1 - Vertical Fixed Roof Tank
Ligonier, Indiana

	Losses(lbs)		
Components	Working Loss	Breathing Loss	Total Emissions
Styrene	59.36	8.14	67.50

Appendix A: Emissions Calculations

Unpaved Roads

Company Name: Structural Composites of Indiana, Inc.
Address City IN Zip: 1118 & 1116 Gerber Street, Ligonier, Indiana 46767
SSM No.: T 113-34924-00074
SPM No.: T 113-35078-00074
Review By: Brandon Miller
Date: October 28, 2014

2.000	trips/hr x
0.050	miles/roundtrip x

876 miles per year

Constants			
where:	**For PM**	**For PM-10**	
k =	10	2.6	(particle size multiplier for PM-10) (k=10 for PM-30 or TSP)
s =	4.8	4.8	mean % silt content of unpaved roads
b =	0.5	0.4	Constant for PM-10 (b = 0.5 for PM-30 or TSP)
c =	0.4	0.3	Constant for PM-10 (c = 0.4 for PM-30 or TSP)
W =	15	15	tons average vehicle weight
Mdry =	0.2	0.2	surface material moisture content, % (default is 0.2 for dry conditions)
p =	125	125	number of days with at least 0.254mm of precipitation (See Figure 13.2.2-1)
Particulate Emission Factor			
Ef =	7.06	1.56	Ef = {k*[(s/12)^0.8]*[(W/3)^b]/[(Mdry/0.2)^c]}*[(365-p)/365] (lb/mile)

PM Emissions = $\dfrac{7.06 \text{ lb/mi} \times 876 \text{ mi/yr}}{2000 \text{ lb/ton}} =$

3.09 tons/yr
0.71 lb/hr

PM-10 Emissions = $\dfrac{1.56 \text{ lb/mi} \times 876 \text{ mi/yr}}{2000 \text{ lb/ton}} =$

0.68 tons/yr
0.16 lb/hr

The following calculations determine the amount of emissions created by vehicle traffic on unpaved roads, based on 8760 hours of use and AP-42, Ch 13.2.2.

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: Scott Rasler
Structural Composites of Indiana, Inc.
1118 Gerber Street
Ligonier, IN 46767

DATE: January 26, 2015

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

SUBJECT: Final Decision
Title V Significant Permit Modification
113-35078-00074

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:
Ken Baranowski, President
Doug Elliott, D & B Environmental Services, Inc.
OAQ Permits Branch Interested Parties List

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

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Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

January 26, 2015

TO: Ligonier Public Library

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

Subject: **Important Information for Display Regarding a Final Determination**

Applicant Name: Structural Composites of Indiana, Inc.
Permit Number: 113-35078-00074

You previously received information to make available to the public during the public comment period of a draft permit. Enclosed is a copy of the final decision and supporting materials for the same project. Please place the enclosed information along with the information you previously received. To ensure that your patrons have ample opportunity to review the enclosed permit, **we ask that you retain this document for at least 60 days.**

The applicant is responsible for placing a copy of the application in your library. If the permit application is not on file, or if you have any questions concerning this public review process, please contact Joanne Smiddie-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185.

Enclosures
Final Library.dot 6/13/2013

Mail Code 61-53

IDEM Staff	VHAUN 1/26/2015 Structural Composites of Indiana, Inc. 113-35078-00074 FINAL			AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender	▶	Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail: **CERTIFICATE OF MAILING ONLY**	

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee Remarks
1		Scott Rasler Structural Composites of Indiana, Inc. 1118 Gerber Street Ligonier IN 46767 (Source CAATS) VIA CERTIFIED MAIL USPS									
2		Ken Baranowski President Structural Composites of Indiana, Inc. 1118 Gerber Street Ligonier IN 46767 *(RO CAATS)*									
3		Noble County Board of Commissioners 101 North Orange Street Albion IN 46701 *(Local Official)*									
4		Noble County Health Department 2090 N. State Rd 9, Suite C Albion IN 46701-9566 *(Health Department)*									
5		Mr. Steve Christman NISWMD 2320 W 800 S, P.O. Box 370 Ashley IN 46705 *(Affected Party)*									
6		Frederick & Iva Moore 6019 W 650 N Ligonier IN 46767 *(Affected Party)*									
7		Ligonier City Council and Mayors Office 103 West Third Street Ligonier IN 46767 *(Local Official)*									
8		Ligonier Public Library 300 S Main St Ligonier IN 46767-1812 *(Library)*									
9		Mr. Doug Elliott D & B Environmental Services, Inc. 401 Lincoln Way West Osceola IN 46561 *(Consultant)*									
10											
11											
12											
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