



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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

Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

Preliminary Findings Regarding a
Significant Modification to a
Part 70 Operating Permit

for MPL Corporation in Shelby County

Significant Source Modification No.: 145-35826-00057
Significant Permit Modification No.: 145-35878-00057

The Indiana Department of Environmental Management (IDEM) has received an application from MPL Corporation, located at 203 N. Edgerton Street, Fairland, IN 46126, for a significant modification of its Part 70 Operating Permit issued on July 17, 2012. If approved by IDEM's Office of Air Quality (OAQ), this proposed modification would allow MPL Corporation to make certain changes at its existing source. MPL Corporation has applied to add a resin auto caster and a gel coat booth to its existing facility.

The applicant intends to construct and operate new equipment that will emit air pollutants; therefore, the permit contains new or different permit conditions. In addition, some conditions from previously issued permits/approvals have been corrected, changed, or removed. These corrections, changes, and removals may include Title I changes (e.g., changes that add or modify synthetic minor emission limits). IDEM has reviewed this application and has developed preliminary findings, consisting of a draft permit and several supporting documents, which would allow the applicant to make this change.

A copy of the permit application and IDEM's preliminary findings are available at:

Shelbyville Shelby County Public Library
57 W. Broadway Street
Shelbyville, IN 46176

A copy of the preliminary findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>.

How can you participate in this process?

The date that this notice is published in a newspaper marks the beginning of a 30-day public comment period. If the 30th day of the comment period falls on a day when IDEM offices are closed for business, all comments must be postmarked or delivered in person on the next business day that IDEM is open.

You may request that IDEM hold a public hearing about this draft permit. If adverse comments concerning the **air pollution impact** of this draft permit are received, with a request for a public hearing, IDEM will decide whether or not to hold a public hearing. IDEM could also decide to hold a public meeting instead of, or in addition to, a public hearing. If a public hearing or meeting is held, IDEM will make a separate announcement of the date, time, and location of that hearing or meeting. At a hearing, you would have an opportunity to submit written comments and make verbal comments. At a meeting, you would have an opportunity to submit written comments, ask questions, and discuss any air pollution concerns with IDEM staff.



Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so that you can be added to IDEM's mailing list to receive notice of future action related to this permit. If you do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit number SSM 145-35826-00057 and SPM 145-35878-00057 in all correspondence.

Comments should be sent to:

Madhurima Moulik
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for extension 3-0868
Or dial directly: (317) 233-0868
Fax: (317) 232-6749 attn: Madhurima Moulik
E-mail: mmoulik@idem.IN.gov

All comments will be considered by IDEM when we make a decision to issue or deny the permit. Comments that are most likely to affect final permit decisions are those based on the rules and laws governing this permitting process (326 IAC 2), air quality issues, and technical issues. IDEM does not have legal authority to regulate zoning, odor, or noise. For such issues, please contact your local officials.

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>.

What will happen after IDEM makes a decision?

Following the end of the public comment period, IDEM will issue a Notice of Decision stating whether the permit has been issued or denied. If the permit is issued, it may be different than the draft permit because of comments that were received during the public comment period. If comments are received during the public notice period, the final decision will include a document that summarizes the comments and IDEM's response to those comments. If you have submitted comments or have asked to be added to the mailing list, you will receive a Notice of the Decision. The notice will provide details on how you may appeal IDEM's decision, if you disagree with that decision. The final decision will also be available on the Internet at the address indicated above, at the local library indicated above, and the IDEM public file room on the 12th floor of the Indiana Government Center North, 100 N. Senate Avenue, Indianapolis, Indiana 46204-2251.

If you have any questions, please contact Madhurima Moulik of my staff at the above address.



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



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Commissioner

DRAFT

Mr. Tom Crowley, President
MPL Corporation
P. O. Box 220
Fairland, IN 46126

Re: 145-35878-00057
Significant Permit Modification to
Part 70 Renewal No.: T145-31468-00057

Dear Mr. Crowley:

MPL Corporation was issued Part 70 Operating Permit Renewal No. T145-31468-00057 on July 17, 2012 for a stationary cultured marble casting operation located at 203 N. Edgerton Street, Fairland, Indiana 46126. An application requesting changes to this permit was received on May 13, 2015. Pursuant to the provisions of 326 IAC 2-7-12, a 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 - Reinforced Plastics Composites Production NESHAP - 40 CFR 63, Subpart WWWW

Previously issued approvals for this source containing this attachment 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 Madhurima Moulik, of my staff, OAQ, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana, 46204-2251 at 317-233-0868 or 1-800-451-6027, and ask for extension 3-0868.

Sincerely,

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

Attachments: Modified Permit and Technical Support Document

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



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DRAFT

**Part 70 Operating Permit Renewal
OFFICE OF AIR QUALITY**

**MPL Corporation
203 N. Edgerton Street, Fairland, Indiana 46126**

(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.: T145-31468-00057	
Issued by: Original Signed By: Chrystal A. Wagner, Section Chief Permits Branch Office of Air Quality	Issuance Date: July 17, 2012 Expiration Date: July 17, 2017

Significant Permit Modification No.: 145-35878-00057	
Issued by: Chrystal A. Wagner, Section Chief Permits Branch Office of Air Quality	Issuance Date: Expiration Date: July 17, 2017

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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 cultured marble casting operation.

Source Address:	203 N. Edgerton Street, Fairland, Indiana 46126
General Source Phone Number:	(317) 835-9000
SIC Code:	3088
County Location:	Shelby
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 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(14)]

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

- (a) One (1) mold preparation area, constructed in 1992, with a maximum capacity of 1 gallon/hr of mold cleaners and mold release.
- (b) One (1) resin auto caster unit EU-1, constructed in 1992 and replaced in 2007, with a maximum capacity of 1050 lbs/hr of casting resin, exhausted through vent S-2. Under 40 CFR 63, Subpart WWWW, this is considered polymer casting operation.
- (c) One (1) gel coat spray booth EU-2, constructed in 1992, with a maximum capacity of 6 gal/hr of gel coat, equipped with dry filters for particulate control and exhausted to Stack ID# GC-1. Under 40 CFR 63, Subpart WWWW, this is considered to be part of an existing open molding reinforced plastic composites operation.
- (d) One (1) grinding finishing unit EU-3, constructed in 1992, with a maximum capacity of 300 lbs/hr of casting resin, equipped with baghouse for particulate control, exhausted through an internally vented filter S-3.
- (e) One (1) gel coat spray booth, identified as EU-4, constructed in 2005, with a maximum capacity of 6 gal/hr of gel coat, equipped with dry filters for particulate control, exhausted to Stack GC-2. Under 40 CFR 63, Subpart WWWW, this is considered to be part of an existing open molding reinforced plastic composites operation.
- (f) One (1) small pot mixer, identified as EU-5, installed in 2007, with a maximum capacity of 160 lbs/hr of casting resin, exhausted to vent S-2. Under 40 CFR 63, Subpart WWWW, this is considered polymer casting operation.
- (g) One (1) resin auto caster unit EU-6, approved for construction in 2011, with a maximum capacity of 1050 lbs/hr of casting resin, exhausted to vent S-2. Under 40 CFR 63, Subpart WWWW, this is considered polymer casting operation.

- (h) One (1) Resin Auto Caster Unit, identified as unit EU-7, approved in 2015 for construction, with a maximum capacity of 1,050 pounds per hour of casting resin, exhausted through vent S-2. Under 40 CFR 63, Subpart WWWW, this is considered a polymer casting operation.
- (i) One (1) gel coat spray booth, identified as EU-8, approved in 2015 for construction, with a maximum capacity of 6.0 gallons per hour of gel coat, equipped with dry filters for particulate control, exhausted to Stack GC-3. Under 40 CFR 63, Subpart WWWW, this is considered to be part of an existing open molding reinforced plastic composites operation.

A.3 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 does not currently have any insignificant activities, as defined in 326 IAC 2-7-1(21) that have applicable requirements.

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

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

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

SECTION B GENERAL CONDITIONS

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

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

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

- (a) This permit, T145-31468-00057, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

and

United States Environmental Protection Agency, Region 5
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

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

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

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

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

The Permittee shall implement the PMPs.

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

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

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

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

The Permittee shall implement the PMPs.

- (c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. The

PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

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

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance and Enforcement Branch), or
Telephone Number: 317-233-0178 (ask for Office of Air Quality, Compliance and Enforcement Branch)
Facsimile Number: 317-233-6865

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

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

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

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

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

(C) Corrective actions taken.

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

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

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

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

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

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

- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

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

- (a) All terms and conditions of permits established prior to T145-31468-00057 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),(c), or (e) without a prior permit revision, if each of the following conditions is met:

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

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

and

United States Environmental Protection Agency, Region 5
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

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

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

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

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

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(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 Fugitive Particulate Matter Emission Limitations [326 IAC 6-5]

Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate matter emissions shall be controlled according to the attached plan as in Attachment A. The provisions of 326 IAC 6-5 are not federally enforceable.

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

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

C.8 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.9 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.10 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.11 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]

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

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

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

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

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

C.12 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

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

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

C.13 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.14 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.15 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]

Upon detecting an excursion where a response step is required by the D Section or an exceedance of a limitation in this permit:

- (a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:

- (1) initial inspection and evaluation;
 - (2) recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system);
or
 - (3) any necessary follow-up actions to return operation to normal or usual manner of operation.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
- (1) monitoring results;
 - (2) review of operation and maintenance procedures and records; and/or
 - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall record the reasonable response steps taken.

C.16 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.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

Pursuant to 326 IAC 2-6-3(b)(2), starting in 2005 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.18 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:

- (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 Operating Permit.

Records of required monitoring information include the following:

- (AA) The date, place, as defined in this permit, and time of sampling or measurements.
- (BB) The dates analyses were performed.
- (CC) The company or entity that performed the analyses.
- (DD) The analytical techniques or methods used.
- (EE) The results of such analyses.
- (FF) The operating conditions as existing at the time of sampling or measurement.

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

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

C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

(a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. 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.20 Compliance with 40 CFR 82 and 326 IAC 22-1

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

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) mold preparation area, constructed in 1992, with a maximum capacity of 1 gallon/hr of mold cleaners and mold release.
- (b) One (1) resin auto caster unit EU-1, constructed in 1992 and replaced in 2007, with a maximum capacity of 1050 lbs/hr of casting resin, exhausted through vent S-2. Under 40 CFR 63, Subpart WWWW, this is considered polymer casting operation.
- (c) One (1) gel coat spray booth EU-2, constructed in 1992, with a maximum capacity of 6 gal/hr of gel coat, equipped with dry filters for particulate control and exhausted to Stack ID# GC-1. Under 40 CFR 63, Subpart WWWW, this is considered to be part of an existing open molding reinforced plastic composites operation.
- (d) One (1) grinding finishing unit EU-3, constructed in 1992, with a maximum capacity of 300 lbs/hr of casting resin, equipped with baghouse for particulate control, exhausted through an internally vented filter S-3.
- (f) One (1) small pot mixer, identified as EU-5, installed in 2007, with a maximum capacity of 160 lbs/hr of casting resin, exhausted to vent S-2. Under 40 CFR 63, Subpart WWWW, this is considered polymer casting operation.
- (g) One (1) resin auto caster unit EU-6, approved for construction in 2011, with a maximum capacity of 1050 lbs/hr of casting resin, exhausted to vent S-2. Under 40 CFR 63, Subpart WWWW, this is considered polymer casting operation.
- (h) One (1) Resin Auto Caster Unit, identified as unit EU-7, approved in 2015 for construction, with a maximum capacity of 1,050 pounds per hour of casting resin, exhausted through vent S-2. Under 40 CFR 63, Subpart WWWW, this is considered a polymer casting operation.
- (i) One (1) gel coat spray booth, identified as EU-8, approved in 2015 for construction, with a maximum capacity of 6.0 gallons per hour of gel coat, equipped with dry filters for particulate control, exhausted to Stack GC-3. Under 40 CFR 63, Subpart WWWW, this is considered to be part of an existing open molding reinforced plastic composites operation.

(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 Particulate Matter (PM) [326 IAC 6-3-2(e)]

- (a) Pursuant to 326 IAC 6-3-2(d), gel coat spray booths, identified as EU-2 and EU-8, shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, operated in accordance with manufacturer's specifications.
- (b) Pursuant to 326 IAC 6-3-2(e), the particulate emissions from the Grinding Finishing Unit (EU-3) shall be limited to 1.15 lbs/hr, based upon a process weight rate of 300 lbs/hr and the following formula:

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

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

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

D.1.2 Preventive Maintenance Plan [326 IAC 1-6-3]

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.

D.1.3 Operator Training [326 IAC 20-56-2]

Pursuant to 326 IAC 20-56-2:

- (a) Each owner or operator shall train all new and existing personnel, including contract personnel, who are involved in resin and gel coat spraying and applications that could result in excess emissions if performed improperly according to the following schedule:
 - (1) All personnel hired shall be trained within thirty (30) days of hiring.
 - (2) To ensure training goals listed in 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 most recent refresher training, whichever is later.
- (d) Records of prior training programs and former personnel are not required to be maintained.

Compliance Determination Requirements

D.1.4 Particulate Matter (PM)

In order to comply with the particulate limit specified in D.1.1(b) for EU-3, the particulate matter control equipped on EU-3 shall be in operation and control particulate emissions at all times when EU-3 is in operation.

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

D.1.5 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters for EU-2 and EU-8. To monitor the performance of the dry media filters, weekly observations shall be made of the particulate matter from stacks GC-1 and S-2 while EU-2 and EU-8 are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the particulate emissions from the stacks GC-1 and S-2 and the presence of over spray 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

D.1.6 Record Keeping Requirements

- (a) To document the compliance status with Condition D.1.1(a), the Permittee shall maintain a log of daily and monthly inspections of the dry filters, and log of weekly particulate observations.
- (b) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (e) One (1) gel coat spray booth, identified as EU-4, constructed in 2005, with a maximum capacity of 6 gal/hr of gel coat, equipped with dry filters for particulate control, exhausted to Stack GC-2. Under 40 CFR 63, Subpart WWWW, this is considered to be part of an existing open molding reinforced plastic composites operation.

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

Pursuant to 326 IAC 6-3-2(d), gel coat spray booth, identified as EU-4, shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, operated in accordance with manufacturer's specifications.

D.2.2 Preventive Maintenance Plan [326 IAC 1-6-3]

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.

D.2.3 Operator Training [326 IAC 20-56-2]

Pursuant to 326 IAC 20-56-2:

- (a) Each owner or operator shall train all new and existing personnel, including contract personnel, who are involved in resin and gel coat spraying and applications that could result in excess emissions if performed improperly according to the following schedule:
- (1) All personnel hired shall be trained within thirty (30) days of hiring.
 - (2) To ensure training goals listed in 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 most recent refresher training, whichever is later.
- (d) Records of prior training programs and former personnel are not required to be maintained.

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

D.2.4 Monitoring [40 CFR Part 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 media filters, weekly observations shall be made of the particulate matter from stack GC-2 while EU-4 is in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the particulate emissions from the stack and the presence of over spray 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

D.2.5 Record Keeping Requirements

- (a) To document the compliance status with Condition D.2.1, the Permittee shall maintain a log of daily and monthly inspections, and log of weekly particulate observations.
- (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

Emissions Unit Description:

- (b) One (1) resin auto caster unit EU-1, constructed in 1992 and replaced in 2007, with a maximum capacity of 1050 lbs/hr of casting resin, exhausted through vent S-2. Under 40 CFR 63, Subpart WWWW, this is considered polymer casting operation.
- (c) One (1) gel coat spray booth EU-2, constructed in 1992, with a maximum capacity of 6 gal/hr of gel coat, equipped with dry filters for particulate control and exhausted to Stack ID# GC-1. Under 40 CFR 63, Subpart WWWW, this is considered to be part of an existing open molding reinforced plastic composites operation.
- (e) One (1) gel coat spray booth, identified as EU-4, constructed in 2005, with a maximum capacity of 6 gal/hr of gel coat, equipped with dry filters for particulate control, exhausted to Stack GC-2. Under 40 CFR 63, Subpart WWWW, this is considered to be part of an existing open molding reinforced plastic composites operation.
- (f) One (1) small pot mixer, identified as EU-5, installed in 2007, with a maximum capacity of 160 lbs/hr of casting resin, exhausted to vent S-2. Under 40 CFR 63, Subpart WWWW, this is considered polymer casting operation.
- (g) One (1) resin auto caster unit EU-6, approved for construction in 2011, with a maximum capacity of 1050 lbs/hr of casting resin, exhausted to vent S-2. Under 40 CFR 63, Subpart WWWW, this is considered polymer casting operation.
- (h) One (1) Resin Auto Caster Unit, identified as unit EU-7, approved in 2015 for construction, with a maximum capacity of 1,050 pounds per hour of casting resin, exhausted through vent S-2. Under 40 CFR 63, Subpart WWWW, this is considered a polymer casting operation.
- (i) One (1) gel coat spray booth, identified as EU-8, approved in 2015 for construction, with a maximum capacity of 6.0 gallons per hour of gel coat, equipped with dry filters for particulate control, exhausted to Stack GC-3. Under 40 CFR 63, Subpart WWWW, this is considered to be part of an existing open molding reinforced plastic composites operation.

(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 [326 IAC 20-1] [40 CFR Part 63, Subpart A]

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

E.1.2 Reinforced Plastics Composites Production NESHAP [40 CFR Part 63, Subpart WWWW]

The Permittee which engages in reinforced plastics composites production shall comply with the provisions of 40 CFR Part 63, Subpart WWWW (included as Attachment A of this permit).

- (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 (For EU-7)

- (8) 40 CFR 63.5799
- (9) 40 CFR 63.5800
- (10) 40 CFR 63.5805 (b)
- (11) 40 CFR 63.5810 (a) through (d)
- (12) 40 CFR 63.5835 (a), (c)
- (13) 40 CFR 63.5840
- (14) 40 CFR 63.5860 (a)
- (15) 40 CFR 63.5895 (c) and (d)
- (16) 40 CFR 63.5900 (a), (b), (c)
- (17) 40 CFR 63.5905
- (18) 40 CFR 63.5910 (a) through (d), (g), (h) and (i)
- (19) 40 CFR 63.5915 (a), (c), and (d)
- (20) 40 CFR 63.5920
- (21) 40 CFR 63.5925
- (22) 40 CFR 63.5930
- (23) 40 CFR 63.5935

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

Source Name: MPL Corporation
Source Address: 203 N. Edgerton Street, Fairland, Indiana 46126
Part 70 Permit No.: T145-31468-00057

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: MPL Corporation
Source Address: 203 N. Edgerton Street, Fairland, Indiana 46126
Part 70 Permit No.: T145-31468-00057

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 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: MPL Corporation
Source Address: 203 N. Edgerton Street, Fairland, Indiana 46126
Part 70 Permit No.: T145-31468-00057

Months: _____ **to** _____ **Year:** _____

Page 1 of 2

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

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

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

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

Source Description and Location

Source Name:	MPL Corporation
Source Location:	203 N. Edgerton Street, Fairland, IN 46126
County:	Shelby
SIC Code:	3088
Operation Permit No.:	T 145-31468-00057
Operation Permit Issuance Date:	July 17, 2012
Significant Source Modification No.:	145-35826-00057
Significant Permit Modification No.:	145-35878-00057
Permit Reviewer:	Madhurima Moulik

Existing Approvals

The source was issued Part 70 Operating Permit No. T145-31468-00057 on July 17, 2012.

County Attainment Status

The source is located in Shelby County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Attainment effective October 19, 2007, for the 8-hour ozone standard. ¹
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Not designated.

¹Unclassifiable 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 PM_{2.5}.

- (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. Shelby 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}**
Shelby County has been classified as attainment for PM_{2.5}. Therefore, direct PM_{2.5}, SO₂, and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

- (c) Other Criteria Pollutants
 Shelby 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:

Unrestricted Potential Emissions	
Pollutant	Tons/year
PM	12.2
PM ₁₀	12.2
PM _{2.5}	12.2
SO ₂	Negligible
VOC	115.2
CO	0.4
NO _x	0.5
Single HAP	>10.0
Total HAP	>25.0

On June 23, 2014, in the case of *Utility Air Regulatory Group v. EPA*, cause 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 GHG emissions to determine operating permit applicability or PSD applicability to a source or modification.

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

- (b) These emissions are based upon the Technical Support Document for Part 70 Renewal No. T145-31468-00057.
- (c) This existing source is a major source of HAPs, as defined in 40 CFR 63.2, because HAP emissions are greater than ten (10) tons per year for a single HAP and greater than twenty-five (25) tons per year for a combination of HAPs. Therefore, this source is a major source under Section 112 of the Clean Air Act (CAA).

Description of Proposed Modification

The Office of Air Quality (OAQ) has reviewed a modification application, submitted by MPL Corporation on May 13, 2015, relating to the construction and operation of a resin auto caster unit and a gel coat spray booth. The following is a list of the proposed emission units and pollution control devices:

- (a) One (1) Resin Auto Caster Unit, identified as unit EU-7, approved in 2015 for construction, with a maximum capacity of 1,050 pounds per hour of casting resin, exhausted through vent S-2.

Under 40 CFR 63, Subpart WWWW, this is considered polymer casting operation.

- (b) One (1) gel coat spray booth, identified as EU-8, approved in 2015 for construction, with a maximum capacity of 6.0 gallons per hour of gel coat, equipped with dry filters for particulate control, exhausted to Stack GC-3.

Under 40 CFR 63, Subpart WWWW, this is considered to be part of an existing open molding reinforced plastic composites operation.

Enforcement Issues

There are no pending enforcement actions related to this modification.

Stack Summary

Stack ID	Operation	Height (ft)	Diameter (ft)	Flow Rate (acfm)	Temperature (°F)
S-2	EU-7	Ground level	2.75	Not available	Ambient
GC-3	EU-8	Ground level	2.75	Not available	Ambient

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	41.64
PM ₁₀	41.64
PM _{2.5}	41.64
SO ₂	Negligible
VOC	41.31
CO	Negligible
NO _x	Negligible
Single HAPs	>10
Total HAPs	>25

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

This source modification is subject to Significant Source Modification requirements under 326 IAC 2-7-10.5(g)(4) and (g)(6) because the modification has a potential to emit of PM, PM₁₀, PM_{2.5}, and VOC greater than 25 tons per year and greater than 10 and 25 tons per year of a single HAP and combined HAPs, respectively. Additionally, the modification will be incorporated into the Part 70 Operating Permit through a significant permit modification issued pursuant to 326 IAC 2-7-12(d) because, pursuant to 326 IAC 2-7-12(b)(1)(B), a minor permit modification is not applicable to a modification that involves significant changes to existing monitoring or recordkeeping requirements in the Part 70 permit.

Federal Rule Applicability Determination

NSPS:

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

NESHAP:

- (b) The proposed resin Autocaster identified as EU-7 and gel coat booth identified as EU-8 are subject to the National Emission Standards for Hazardous Air Pollutants 40 CFR Part 63, Subpart WWWW and 326 IAC 20-56, Reinforced Plastic Composites Production. The units subject to this rule include the following:
 - (1) One (1) Resin Auto Caster Unit, identified as unit EU-7, approved in 2015 for construction, with a maximum capacity of 1,050 pounds per hour of casting resin, exhausted through vent S-2.
 - (2) One (1) gel coat spray booth, identified as EU-8, approved in 2015 for construction, with a maximum capacity of 6.0 gallons per hour of gel coat, equipped with dry filters for particulate control, exhausted to Stack GC-3.

The resin casting unit EU-7 is not subject to an emission limitation under this NESHAP because it does not meet any of the categories included in the NESHAP. Pursuant to 40 CFR 63.5798, a source that uses an application technology whose organic HAP emissions characteristics are not represented by the equations in Table 1 to this subpart, the following shall apply:

If you wish to use a resin or gel coat application technology (new or existing), whose emission characteristics are not represented by the equations in Table 1 to this subpart, you may use the procedures in paragraphs (a) or (b) of this section to establish an organic HAP emissions factor. This organic HAP emissions factor may then be used to determine compliance with the emission limits in this subpart, and to calculate facility organic HAP emissions.

(a) Perform an organic HAP emissions test to determine a site-specific organic HAP emissions factor using the test procedures in §63.5850.

(b) Submit a petition to the Administrator for administrative review of this subpart. This petition must contain a description of the resin or gel coat application technology and supporting organic HAP emissions test data obtained using EPA test methods or their equivalent. The emission test data should be obtained using a range of resin or gel coat HAP contents to demonstrate the effectiveness of the technology under the different conditions, and to demonstrate that the technology will be effective at different sites. We will review the submitted data, and, if appropriate, update the equations in Table 1 to this subpart.

For the emission unit EU-8:

Nonapplicable portions of the NESHAP will not be included in the permit. The existing affected source associated with the production of plastic composites is subject to the following portions of 40 CFR 63, Subpart WWWW (Updated 40 CFR 63, Subpart WWWW is already included as Attachment A to the permit):

- (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 (For EU-7)
- (8) 40 CFR 63.5799
- (9) 40 CFR 63.5800
- (10) 40 CFR 63.5805 (b)
- (11) 40 CFR 63.5810 (a) through (d)
- (12) 40 CFR 63.5835 (a), (c)
- (13) 40 CFR 63.5840
- (14) 40 CFR 63.5860 (a)
- (15) 40 CFR 63.5895 (c) and (d)
- (16) 40 CFR 63.5900 (a), (b), (c)
- (17) 40 CFR 63.5905
- (18) 40 CFR 63.5910 (a) through (d), (g), (h) and (i)
- (19) 40 CFR 63.5915 (a), (c), and (d)
- (20) 40 CFR 63.5920
- (21) 40 CFR 63.5925
- (22) 40 CFR 63.5930
- (23) 40 CFR 63.5935

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

- (c) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to each new or modified pollutant-specific emission unit that meets the following criteria:

- (1) has a potential to emit before controls equal to or greater than the Part 70 major source threshold for the pollutant involved;
- (2) is subject to an emission limitation or standard for that pollutant; and
- (3) uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.

The 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)
EU-7	N	Y	<100	<100	100	N	N
EU-8	Y	Y	<100	<100	100	N	N

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

State Rule Applicability Determination

326 IAC 2-2 (PSD)

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

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

Pursuant to 326 IAC 2-4.1-1(b)(2), the requirements of 326 IAC 2-4.1-1 do not apply to a major source specifically regulated, or exempt from regulation, by a standard issued pursuant to Section 112(d), 112(h), or 112(j) of the CAA.

This source is subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Reinforced Plastics Composites Production (40 CFR 63, Subpart WWWW). Therefore, 326 IAC 2-4.1-1 does not apply.

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

Pursuant to 326 IAC 6-3-2(d), the new gel coat spray booth, identified as EU-8, shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, operated in accordance with manufacturer's specifications.

Pursuant to 326 IAC 6-3-1(b)(14), the resin autocaster, which has less than 0.551 pound per hour of PM emissions, is exempt from PM emission limitations under 326 IAC 6-3-2.

326 IAC 20-56 (Reinforced Plastics Composites Production: Operator Training)

The requirements of 326 IAC 20-56 are applicable to the proposed units EU-7 and EU-8, as these emission units are subject to 40 CFR 63, Subpart WWWW.

Pursuant to 326 IAC 20-56-2:

- (a) Each owner or operator shall train all new and existing personnel, including contract personnel, who are involved in resin and gel coat spraying and applications that could result in excess emissions if performed improperly according to the following schedule:
 - (1) All personnel hired shall be trained within thirty (30) days of hiring.
 - (2) To ensure training goals listed in 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 most recent refresher training, whichever is later.
- (d) Records of prior training programs and former personnel are not required to be maintained.

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 Determination Requirements applicable to this modification are as follows:

In order to comply with the requirements of 326 IAC 6-3-2, the new gel coat spray booth, identified as EU-8, shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, operated in accordance with manufacturer's specifications.

The compliance monitoring requirements applicable to this modification are as follows:

Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters for EU-8. To monitor the performance of the dry media filters, weekly observations shall be made of the particulate matter from stacks S-2 while EU-8 is in operation. If a condition exists which should result in a response step, 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.

These monitoring conditions are necessary because the baghouse for the gel coat booth EU-8 must operate properly to ensure compliance with 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) and 326 IAC 2-7 (Part 70).

Proposed Changes

The changes listed below have been made to Part 70 Operating Permit No. T145-31468-00057. Deleted language appears as ~~strikethroughs~~ and new language appears in **bold**:

- (a) Sections A.2, D.1, and E.1 have been modified to incorporate the proposed emissions units EU-7 and EU-8.
- (b) Condition D.1.1 - Particulate Matter (PM) [326 IAC 6-3-2(e)] has been modified to include the applicable requirement for the proposed gel coat booth EU-8.
- (c) Conditions D.1.2 and D.2.2 - Preventive Maintenance Plan has been modified for clarification purposes.
- (d) Condition D.1.5 - Monitoring has been modified to include the monitoring requirements for the dry filters for the proposed unit EU-8.
- (e) Section E.1 has been modified to include the requirements under 40 CFR 63, Subpart WWWW that are applicable to the proposed units EU-7 and EU-8 and clarify the requirements for existing units.

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

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

- (a) One (1) mold preparation area, constructed in 1992, with a maximum capacity of 1 gallon/hr of mold cleaners and mold release.
- ...
- (g) One (1) resin auto caster unit EU-6, approved for construction in 2011, with a maximum capacity of 1050 lbs/hr of casting resin, exhausted to vent S-2. Under 40 CFR 63, Subpart WWWW, this is considered polymer casting operation.
- (h) **One (1) Resin Auto Caster Unit, identified as unit EU-7, approved in 2015 for construction, with a maximum capacity of 1,050 pounds per hour of casting resin, exhausted through vent S-2. Under 40 CFR 63, Subpart WWWW, this is considered a polymer casting operation.**
- (i) **One (1) gel coat spray booth, identified as EU-8, approved in 2015 for construction, with a maximum capacity of 6.0 gallons per hour of gel coat, equipped with dry**

filters for particulate control, exhausted to Stack GC-3. Under 40 CFR 63, Subpart WWWW, this is considered to be part of an existing open molding reinforced plastic composites operation.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) mold preparation area, constructed in 1992, with a maximum capacity of 1 gallon/hr of mold cleaners and mold release.
...
- (g) One (1) resin auto caster unit EU-6, approved for construction in 2011, with a maximum capacity of 1050 lbs/hr of casting resin, exhausted to vent S-2. Under 40 CFR 63, Subpart WWWW, this is considered polymer casting operation.
- (h) One (1) Resin Auto Caster Unit, identified as unit EU-7, approved in 2015 for construction, with a maximum capacity of 1,050 pounds per hour of casting resin, exhausted through vent S-2. Under 40 CFR 63, Subpart WWWW, this is considered a polymer casting operation.**
- (i) One (1) gel coat spray booth, identified as EU-8, approved in 2015 for construction, with a maximum capacity of 6.0 gallons per hour of gel coat, equipped with dry filters for particulate control, exhausted to Stack GC-3. Under 40 CFR 63, Subpart WWWW, this is considered to be part of an existing open molding reinforced plastic composites operation.**

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

D.1.1 Particulate Matter (PM) [326 IAC 6-3-2(e)]

- (a) Pursuant to 326 IAC 6-3-2(d), gel coat spray booths, identified as EU-2 **and EU-8**, shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, operated in accordance with manufacturer's specifications.
- (b) Pursuant to 326 IAC 6-3-2(e), the particulate emissions from the Grinding Finishing Unit (EU-3) shall be limited to 1.15 lbs/hr, based upon a process weight rate of 300 lbs/hr and the following formula:

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

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

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

D.1.2 Preventive Maintenance Plan [326 IAC 1-6-3]

~~A Preventative Maintenance Plan is required for mold preparation area, Resin Casting unit EU-1, Gel Coat Spray Booth EU-2, grinding finishing unit EU-3, Small Pot Mixer EU-5, and Resin Auto Caster unit EU-6 and its control device. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.~~
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.

D.1.5 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters equipped on EU-2 **and EU-8**. To monitor the performance of the dry media filters, weekly observations shall be made of the particulate matter from stacks GC-1 **and S-2** while EU-2 **and EU-8** are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the particulate emissions from the stack GC-1 **and S-2** and the presence of over spray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

D.2.2 Preventive Maintenance Plan [326 IAC 1-6-3]

~~A Preventative Maintenance Plan is required for Gel Coat Spray Booth EU-1 and its control device. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.~~ **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.**

SECTION E.1

FACILITY OPERATION CONDITIONS

Emissions Unit Description:

- (b) One (1) resin auto caster unit EU-1, constructed in 1992 and replaced in 2007, with a maximum capacity of 1050 lbs/hr of casting resin, exhausted through vent S-2. Under 40 CFR 63, Subpart WWWW, this is considered polymer casting operation.
-
- (g) One (1) resin auto caster unit EU-6, approved for construction in 2011, with a maximum capacity of 1050 lbs/hr of casting resin, exhausted to vent S-2. Under 40 CFR 63, Subpart WWWW, this is considered polymer casting operation.
- (h) **One (1) Resin Auto Caster Unit, identified as unit EU-7, approved in 2015 for construction, with a maximum capacity of 1,050 pounds per hour of casting resin, exhausted through vent S-2. Under 40 CFR 63, Subpart WWWW, this is considered a polymer casting operation.**
- (i) **One (1) gel coat spray booth, identified as EU-8, approved in 2015 for construction, with a maximum capacity of 6.0 gallons per hour of gel coat, equipped with dry filters for particulate control, exhausted to Stack GC-3. Under 40 CFR 63, Subpart WWWW, this is considered to be part of an existing open molding reinforced plastic composites operation.**

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

E.1.2 Reinforced Plastics Composites Production NESHAP [40 CFR Part 63, Subpart WWWW]

The Permittee which engages in reinforced plastics composites production shall comply with the provisions of 40 CFR Part 63, Subpart WWWW (included as Attachment A of this permit).

- (1) — 40 CFR 63.5780
- (2) — 40 CR 63.5785(a)
- (3) — 40 CR 63.5790(a), (b), and (c)
- (4) — 40 CR 63.5795 (a) and (b)
- (5) — 40 CR 63.5796
- (6) — 40 CR 63.5797 (a), (b), and (c)
- (7) — 40 CR 63.5798
- (8) — 40 CR 63.5799
- (9) — 40 CR 63.5800
- (10) — 40 CR 63.5805 (b)
- (11) — 40 CR 63.5810 (a) through (d)
- (12) — 40 CFR 63.5835(a)
- (13) — 40 CR 63.5840
- (14) — 40 CR 63.5850(c)
- (15) — 40 CFR 63.5860(a)
- (16) — 40 CFR 63.5895(c) and (d)
- (17) — 40 CFR 63.5900(a), (b) and (c)
- (18) — 40 CFR 63.5905 (a) and (b)
- (19) — 40 CFR 63.5910(a) through (d), (g), (h), and (i)
- (20) — 40 CFR 63.5915(a), (c) and (d)
- (21) — 40 CFR 63.5920 (a), (b), (c) and (d)
- (22) — 40 CFR 63.5925
- (23) — 40 CFR 63.5930
- (24) — 40 CFR 63.5935

- (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 (For EU-7)
- (8) 40 CFR 63.5799
- (9) 40 CFR 63.5800
- (10) 40 CFR 63.5805 (b)
- (11) 40 CFR 63.5810 (a) through (d)
- (12) 40 CFR 63.5835 (a), (c)
- (13) 40 CFR 63.5840
- (14) 40 CFR 63.5860 (a)
- (15) 40 CFR 63.5895 (c) and (d)
- (16) 40 CFR 63.5900 (a), (b), (c)
- (17) 40 CFR 63.5905
- (18) 40 CFR 63.5910 (a) through (d), (g), (h) and (i)
- (19) 40 CFR 63.5915 (a), (c), and (d)
- (20) 40 CFR 63.5920
- (21) 40 CFR 63.5925
- (22) 40 CFR 63.5930
- (23) 40 CFR 63.5935

Conclusion and Recommendation

The construction and operation of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Source Modification No. 145-35826-00057 and Significant Permit Modification No. 145-35878-00057. 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 Madhurima Moulik at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCM 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 233-0868 or toll free at 1-800-451-6027 extension 3-0868.
- (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>.

PTE Summary

Company Name: MPL Corporation
 Address City IN Zip: 203 N. Edgerton Street, Fairland, IN 46126
 SSM/SPM No. : 145-35826-00057/145-35878-00057
 Pit ID: 145-00057
 Reviewer: Madhurima D. Moulik
 Date: 6/4/2015

Potential Emissions from Modification

Emission Unit	Emissions (tons/yr)			
	VOC	Single HAP (Styrene)	Total HAPs	PM/PM10/PM2.5
EU-7	22.31	22.31	22.31	0.00
EU-8	19.00	19.00	19.00	41.64
Total	41.31	41.31	41.31	41.64

Facility-Wide Total (unrestricted)

Emission Unit	Emissions (tons/yr)								
	VOC	Single HAP (Styrene)	Total HAPs	PM	PM10	PM2.5	SOx	NOx	CO
EU-1	19.94	19.94	19.94	0.00	0.00	0.00	0	0	0
EU-5	3.04	3.04	3.04	0.00	0.00	0.00	0	0	0
EU-6	19.94	19.94	19.94	0.00	0.00	0.00	0	0	0
EU-7 (new)	22.31	22.31	22.31	0.00	0.00	0.00	0	0	0
EU-2	19.00	19.00	19.00	41.64	41.64	41.64	0	0	0
EU-4	19.00	19.00	19.00	41.64	41.64	41.64	0	0	0
EU-8 (new)	19.00	19.00	19.00	41.64	41.64	41.64	0	0	0
Mold Prep	4.08	0	0.41	0	0.00	0.00	0	0	0
EU-3	0.00	0	0.00	27.45	25.80	21.41	0	0	0
Combustion	0.03	0		0.01	0.04	0.04	0.00	0.48	0.40
Total	126.34	122.23	122.65	152.38	150.76	146.37	0.00	0.48	0.40

TSD Appendix A

Resin Casting Operations

Company Name: MPL Corporation

Address City IN Zip: 203 N. Edgerton Street, Fairland, IN 46126

SSM/SPM No. : 145-35826-00057/145-35878-00057

Pit ID: 145-00057

Reviewer: Madhurima D. Moulik

Date: 6/4/2015

Highest VOC/HAP Content Coating	wt% VOC	wt% Single HAP (Styrene)	wt% Total HAP
CCP Marble resin (102659D)	43.36%	43.36%	43.36%

Emission Unit	Throughput (lbs/hr resin material)	% Released	Potential Emissions (tons/yr)		
			VOC	Single HAP (Styrene)	Total HAPs
EU-1	1050	1%	19.94	19.94	19.94
EU-5	160	1%	3.04	3.04	3.04
EU-6	1050	1%	19.94	19.94	19.94

VOC/HAP Emissions = Throughput (lbs/hr) x wt% VOC/HAP x 8760 hrs/yr x 1 ton/2000 lbs x % Released

% Released value is from AP-42, Table 4.4-2.

TSD Appendix A
Gel Coat Operations

Company Name: MPL Corporation
Address City IN Zip: 203 N. Edgerton Street, Fairland, IN 46126
SSM/SPM No. : 145-35826-00057/145-35878-00057
Plt ID: 145-00057
Reviewer: Madhurima D. Moulik
Date: 6/4/2015

Emission Unit	Maximum Throughput (gal/hr)	Type of Gel Coat	Material	Density (lb/gal)	wt% VOC	wt% Styrene	wt% Total HAPs	wt% PM	% Release	Transfer Efficiency	Emissions (tons/yr)			
											VOC	Styrene	Total HAPs	PM/PM10
EU-2	6	Clear	Low HAP Clear Gel Coat	9.1	44%	44%	44%	56%	18.06%	80%	19.00	19.00	19.00	26.78
		White	CCP Glacier White Gelcoat (563583)	11.27	29.72%	29.72%	29.72%	70.28%	10.23%	80%	9.01	9.01	9.01	41.64
		Pigmented	Almond Gel Coat	10.64	33.50%	33.50%	33.50%	66.50%	12.94%	80%	12.12	12.12	12.12	37.19
EU-4	6	Clear	Low HAP Clear Gel Coat	9.1	44%	44%	44%	56%	18.06%	80%	19.00	19.00	19.00	26.78
		White	CCP Glacier White Gelcoat (563583)	11.27	29.72%	29.72%	29.72%	70.28%	10.23%	80%	9.01	9.01	9.01	41.64
		Pigmented	Almond Gel Coat	10.64	33.50%	33.50%	33.50%	66.50%	12.94%	80%	12.12	12.12	12.12	37.19

VOC/HAP Emissions (tons/yr) = Usage (gal/hr) x Density (lb/gal) x wt% VOC/HAP x 8760 hrs/yr x 1 ton/2000 lbs x % Release
PM/PM10 Emissions (tons/yr) = Usage (gal/hr) x Density (lb/gal) x wt% Solids x 8760 hrs/yr x 1 ton/2000 lbs x (1 - Transfer Efficiency)

Note: Only one coating can be sprayed at a time. Bold numbers represent the worst-case potential emissions. The Low LAP Clear Gel Goat is the worst-case coating for VOC and HAP emissions and the CCP Glacier White Gelcoat is the worst-case coating for PM/PM10 emissions.

% Release values are from the results of the test conducted by the American Composites Manufacturing Association.

TSD Appendix A
 New Equipment (EU-7 and EU-8)
 Company Name: MPL Corporation
 Address City IN Zip: 203 N. Edgerton Street, Fairland, IN 46126
 SSM/SPM No. : 145-35826-00057/145-35878-00057
 Pit ID: 145-00057
 Reviewer: Madhurima D. Moulik
 Date: 6/4/2015

Resin Casting Operation

Highest VOC/HAP Content Coating	wt% VOC	wt% Single HAP (Styrene)	wt% Total HAP
Resin ISO (DION 6631-00)	48.50%	48.50%	48.50%

Emission Unit	Throughput (lbs/hr resin material)	% Released	Potential Emissions (tons/yr)		
			VOC	Single HAP (Styrene)	Total HAPs
EU-7	1050	1%	22.31	22.31	22.31

VOC/HAP Emissions = Throughput (lbs/hr) x wt% VOC/HAP x 8760 hrs/yr x 1 ton/2000 lbs x % Released

% Released value is from AP-42, Table 4.4-2.

Emission factors are based on AP 42 Table 4.4-2.

The source has provided following justification for using 1% Emission Factor (%) for the styrene: The resin mixing process at EU-7 and at existing EU-1, EU-5 and EU-6 are enclosed, therefore, emissions associated with mixing have been eliminated.

Potential VOC Pounds per Hour = Throughput (lb of Resin/hr) * Weight % Styrene Monomer or VOC * VOC Emission Factor (%)

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

Gel Coat Booth

Emission Unit	Maximum Throughput (gal/hr)	Type of Gel Coat	Material	Density (lb/gal)	wt% VOC	wt% Styrene	wt% Total HAPs	wt% PM	% Release	Transfer Efficiency	Emissions (tons/yr)			
											VOC	Styrene	Total HAPs	PM/PM10
EU-8	6	Clear	Low HAP Clear Gel Coat	9.1	44%	44%	44%	56%	18.06%	80%	19.00	19.00	19.00	26.78
		White	CCP Glacier White Gelcoat (563583)	11.27	29.72%	29.72%	29.72%	70.28%	10.23%	80%	9.01	9.01	9.01	41.64
		Pigmented	Almond Gel Coat	10.64	33.50%	33.50%	33.50%	66.50%	12.94%	80%	12.12	12.12	12.12	37.19

Methodology VOC/HAP Emissions (tons/yr) = Usage (gal/hr) x Density (lb/gal) x wt% VOC/HAP x 8760 hrs/yr x 1 ton/2000 lbs x % Release

PM/PM10 Emissions (tons/yr) = Usage (gal/hr) x Density (lb/gal) x wt% Solids x 8760 hrs/yr x 1 ton/2000 lbs x (1 - Transfer Efficiency)

EU-8 emission factors based on test conducted using same spray guns as used at MPL

Note: Only one coating can be sprayed at a time. Bold numbers represent the worst-case potential emissions. The Low LAP Clear Gel Coat is the worst-case coating for VOC and HAP emissions and the CCP Glacier White Gelcoat is the worst-case coating for PM/PM10 emissions.

% Release values are from the results of the test conducted by the American Composites Manufacturing Association.

**TSD Appendix A
Mold Preparation**

Company Name: MPL Corporation
Address City IN Zip: 203 N. Edgerton Street, Fairland, IN 46126
SSM/SPM No. : 145-35826-00057/145-35878-00057
Plt ID: 145-00057
Reviewer: Madhurima D. Moulik
Date: 6/4/2015

Material	Density (lb/gal)	wt% VOC	wt% Toluene	wt% Xylene	Usage (gal/unit)	Maximum Production (unit/hr)	VOC (lb/hr)	VOC (lb/day)	VOC (ton/yr)	HAPS (ton/yr)
Thermaclean/Marble Wash	9.12	99.60%	0%	0%	0.0015	15	0.20	4.91	0.90	0.00
Axe Mold Cleaner/Release	6.46	98%	0%	0%	0.006	15	0.57	13.67	2.50	0.00
Axe Mold Cleaner/Sealer	7.01	100%	30%	30%	0.0015	15	0.16	3.79	0.69	0.41
Total							0.93	22.37	4.08	0.41

Emissions (lb/hr) = Usage (gal/unit) x Production (unit/hr) x Density (lb/gal) x wt% VOC/HAP

Emissions (lb/day) = Emissions (lb/hr) x 24 hr/day

Emissions (ton/yr) = Emissions (lb/day) x 365 day/yr x 1 ton/2000 lbs

**TSD Appendix A
Natural Gas Combustion**

Company Name: MPL Corporation
Address City IN Zip: 203 N. Edgerton Street, Fairland, IN 46126
SSM/SPM No. : 145-35826-00057/145-35878-00057
Plt ID: 145-00057
Reviewer: Madhurima D. Moulik
Date: 6/4/2015

Emission Factors (lb/MMCF)						
PM	PM10	PM2.5	SOx	NOx	VOC	CO
1.9	7.6	7.6	0.6	100	5.5	84

Emission Unit	Heat Input Capacity (MMBtu/hr)	Emissions (tons/yr)						
		PM	PM10	PM2.5	SOx	NOx	VOC	CO
B-1	1.1	0.01	0.04	0.04	0.00	0.48	0.03	0.40
Total		0.01	0.04	0.04	0.00	0.48	0.03	0.40

Emissions (tons/yr) = Heat Input Capacity (MMBtu/hr) x Emission Factor (lb/MMCF) x 1 MMCF/1000 MMBtu x 8760 hr/yr x 1 ton/2000 lbs

Emission Factors are from AP-42, Table 1.4-1, 1.4-2, 1.4-3

TSD Appendix A Page 7 of 7 TSD App A
Grinding Emissions

Company Name: MPL Corporation
Address City IN Zip: 203 N. Edgerton Street, Fairland, IN 46126
SSM/SPM No. : 145-35826-00057/145-35878-00057
Plt ID: 145-00057
Reviewer: Madhurima D. Moulik
Date: 6/4/2015

Flow Rate (cfm)	Grain Loading (gr/dscf)	PM Emissions (tons/yr)	PM10 Emissions (tons/yr)	PM2.5 Emissions (tons/yr)
18280	0.002	27.45	25.80	21.41

PM Emissions (tons/yr) = Grain Loading (gr/dscf) x Flow Rate (cfm) x Hours of Operation (hrs/yr)/(1 - 95% Control)
x 60 min/hr x 1 lb/7,000 gr x 1 ton/2,000 lbs
PM10 Emissions (ton/yr) = 94% x PM Emissions (tons/yr)
PM2.5 Emissions (tons/yr) = 78% x PM Emissions (tons/yr)



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

July 9, 2015

Mr. Tom Crowley, President
MPL Corporation
PO Box 220
Fairland, IN 46126

Re: Public Notice
MPL Corporation
Permit Level: Title V Significant Source
Modification and Significant Permit Modification
Permit Number: 145-35826-00057 and
145-35878-00057

Dear Mr. Crowley:

Enclosed is a copy of your draft Title V Significant Source Modification and Significant Permit Modification, Technical Support Document, emission calculations, and the Public Notice which will be printed in your local newspaper.

The Office of Air Quality (OAQ) has prepared two versions of the Public Notice Document. The abbreviated version will be published in the newspaper, and the more detailed version will be made available on the IDEM's website and provided to interested parties. Both versions are included for your reference. The OAQ has requested that the Shelbyville News in Shelbyville, Indiana publish the abbreviated version of the public notice no later than July 12, 2015. You will not be responsible for collecting any comments, nor are you responsible for having the notice published in the newspaper.

OAQ has submitted the draft permit package to the Shelbyville Shelby County Public Library, 57 West Broadway Street in Shelbyville, Indiana. As a reminder, you are obligated by 326 IAC 2-1.1-6(c) to place a copy of the complete permit application at this library no later than ten (10) days after submittal of the application or additional information to our department. We highly recommend that even if you have already placed these materials at the library, that you confirm with the library that these materials are available for review and request that the library keep the materials available for review during the entire permitting process.

Please review the enclosed documents carefully. This is your opportunity to comment on the draft permit and notify the OAQ of any corrections that are needed before the final decision. Questions or comments about the enclosed documents should be directed to Madhurima Moulik, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension 3-0868 or dial (317) 233-0868.

Sincerely,

Vivian Haun

Vivian Haun
Permits Branch
Office of Air Quality

Enclosures
PN Applicant Cover letter-2014. Dot4/10/14



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Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING

July 8, 2015

The Shelbyville News
123 East Washington Street
PO Box 750
Shelbyville, IN 46176

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for MPL Corporation, Shelby County, Indiana.

Since our agency must comply with requirements which call for a Notice of Public Comment, we request that you print this notice one time, no later than July 12, 2015.

Please send a notarized form, clippings showing the date of publication, and the billing to the Indiana Department of Environmental Management, Accounting, Room N1345, 100 North Senate Avenue, Indianapolis, Indiana, 46204.

To ensure proper payment, please reference account # 100174737.

We are required by the Auditor's Office to request that you place the Federal ID Number on all claims. If you have any conflicts, questions, or problems with the publishing of this notice or if you do not receive complete public notice information for this notice, please call Vivian Haun at 800-451-6027 and ask for extension 3-6878 or dial 317-233-6878.

Sincerely,

Vivian Haun

Vivian Haun
Permit Branch
Office of Air Quality

Permit Level: Title V Significant Source Modification and Significant Permit Modification
Permit Number: 145-35826-00057 and 145-35878-00057

Enclosure

PN Newspaper.dot 6/13/2013



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

July 9, 2015

To: Shelbyville Shelby County Public Library

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

Subject: **Important Information to Display Regarding a Public Notice for an Air Permit**

Applicant Name: MPL Corporation
Permit Number: 145-35826-00057 and 145-35878-00057

Enclosed is a copy of important information to make available to the public. This proposed project is regarding a source that may have the potential to significantly impact air quality. Librarians are encouraged to educate the public to make them aware of the availability of this information. The following information is enclosed for public reference at your library:

- Notice of a 30-day Period for Public Comment
- Request to publish the Notice of 30-day Period for Public Comment
- Draft Permit and Technical Support Document

You will not be responsible for collecting any comments from the citizens. Please refer all questions and request for the copies of any pertinent information to the person named below.

Members of your community could be very concerned in how these projects might affect them and their families. **Please make this information readily available until you receive a copy of the final package.**

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. Questions pertaining to the permit itself should be directed to the contact listed on the notice.

Enclosures
PN Library.dot 6/13/2013



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

Notice of Public Comment

July 9, 2015

MPL Corporation

145-35826-00057 and 145-35878-00057

Dear Concerned Citizen(s):

You have been identified as someone who could potentially be affected by this proposed air permit. The Indiana Department of Environmental Management, in our ongoing efforts to better communicate with concerned citizens, invites your comment on the draft permit.

Enclosed is a Notice of Public Comment, which has been placed in the Legal Advertising section of your local newspaper. The application and supporting documentation for this proposed permit have been placed at the library indicated in the Notice. These documents more fully describe the project, the applicable air pollution control requirements and how the applicant will comply with these requirements.

If you would like to comment on this draft permit, please contact the person named in the enclosed Public Notice. Thank you for your interest in the Indiana's Air Permitting Program.

Please Note: *If you feel you have received this Notice in error, or would like to be removed from the Air Permits mailing list, please contact Patricia Pear with the Air Permits Administration Section at 1-800-451-6027, ext. 3-6875 or via e-mail at PPEAR@IDEM.IN.GOV. If you have recently moved and this Notice has been forwarded to you, please notify us of your new address and if you wish to remain on the mailing list. Mail that is returned to IDEM by the Post Office with a forwarding address in a different county will be removed from our list unless otherwise requested.*

Enclosure
PN AAA Cover.dot 6/13/13



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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

Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

AFFECTED STATE NOTIFICATION OF PUBLIC COMMENT PERIOD DRAFT INDIANA AIR PERMIT

July 9, 2015

A 30-day public comment period has been initiated for:

Permit Number: 145-35826-00057 and 145-35878-00057
Applicant Name: MPL Corporation
Location: Fairland, Shelby County, Indiana

The public notice, draft permit and technical support documents can be accessed via the **IDEM Air Permits Online** site at:

<http://www.in.gov/ai/appfiles/idem-caats/>


Questions or comments on this draft permit should be directed to the person identified in the public notice by telephone or in writing to:

Indiana Department of Environmental Management
Office of Air Quality, Permits Branch
100 North Senate Avenue
Indianapolis, IN 46204

Questions or comments regarding this email notification or access to this information from the EPA Internet site can be directed to Chris Hammack at chammack@idem.IN.gov or (317) 233-2414.

Affected States Notification.dot 3/13/2013

Mail Code 61-53

IDEM Staff	VHAUN 7/9/2015 MPL Corporation 145-35826 and 35878-00057 DRAFT			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		Tom Crowley MPL Corporation PO Box 220 Fairland IN 46126 (Source CAATS)										
2		Mr. Hugh Garner 10203 S Degelow Road Milroy IN 46156 (Affected Party)										
3		Shelbyville City Council and Mayors Office 44 West Washington Shelbyville IN 46176 (Local Official)										
4		Shelby County Commissioners 25 West Polk Shelbyville IN 46176 (Local Official)										
5		Shelbyville Shelby Co Public Library 57 W Broadway Shelbyville IN 46176-1294 (Library)										
6		Shelby County Health Department 1600 E. SR 44B Shelbyville IN 46176 (Health Department)										
7		Holly Argiris Environmental Resources Management (ERM) 8425 Woodfield Crossing Blvd, Suite 560-W Indianapolis IN 46240 (Consultant)										
8		Tami Grubbs Shelby County Council 2961 N 100 W Shelbyville In 46176 (Affected Party)										
9												
10												
11												
12												
13												
14												
15												

Total number of pieces Listed by Sender	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See Domestic Mail Manual R900, S913, and S921 for limitations of coverage on inured and COD mail. See International Mail Manual for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
8			