



# 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](http://www.idem.IN.gov)

**Michael R. Pence**  
Governor

**Carol S. Comer**  
Commissioner

## NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

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

for Industrial Dielectrics in Hamilton County

Significant Source Modification No.: 057-36422-00042  
Significant Permit Modification No.: 057-36476-00042

The Indiana Department of Environmental Management (IDEM) has received an application from Industrial Dielectrics, located at 407 South 7th Street, Noblesville, IN 46061, for a significant modification of its Part 70 Operating Permit issued on August 5, 2013. If approved by IDEM's Office of Air Quality (OAQ), this proposed modification would allow Industrial Dielectrics to make certain changes at its existing source. Industrial Dielectrics has applied to construct and operate one (1) 36" SMC Line, one (1) 5-gallon SMC, three (3) compression molding presses, and one (1) small SMC extruder. The new 36" SMC Line will replace the existing 24" Line.

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:

Hamilton East Public Library  
1 Library Plaza  
Noblesville, Indiana 46060

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 30<sup>th</sup> 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 057-36422-00042 and SPM 057-36476-00042 in all correspondence.

**Comments should be sent to:**

Nicholas Eilerman  
IDEM, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
(800) 451-6027, ask for extension 4-5373  
Or dial directly: (317) 234-5373  
Fax: (317) 232-6749 attn: Nicholas Eilerman  
E-mail: neilerma@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 12<sup>th</sup> floor of the Indiana Government Center North, 100 N. Senate Avenue, Indianapolis, Indiana 46204-2251.

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



Iryn Calilung, Section Chief  
Permits Branch  
Office of Air Quality



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Governor

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Commissioner

## DRAFT

Mr. Rich Snyder  
Industrial Dielectrics  
407 S 7th Street, P.O. Box 357  
Noblesville, IN 46061

Re: 057-36476-00042  
Significant Permit Modification to  
Part 70 Renewal No.: T057-31912-00042

Dear Mr. Snyder:

Industrial Dielectrics was issued Part 70 Operating Permit Renewal No. T057-31912-00042 on August 5, 2013 for a stationary custom compounding of purchased plastic resins located at 407 South 7th Street, Noblesville, IN 46061. An application requesting changes to this permit was received on October 27, 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(s). Since these attachments have been provided in previously issued approvals for this source, IDEM OAQ has not included a copy of these attachments with this modification:

- Attachment A: 40 CFR 63, Subpart WWWW – NESHAP for Reinforced Plastic Composites Production
- Attachment B: 40 CFR 60, Subpart IIII – NSPS for Stationary Compression Ignition Internal Combustion Engines

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

Federal rules under Title 40 of United States Code of Federal Regulations may also be found on the U.S. Government Printing Office's Electronic Code of Federal Regulations (eCFR) website, located on the Internet at: [http://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title40/40tab\\_02.tpl](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.

## DRAFT

If you have any questions on this matter, please contact Nicholas Eilerman, of my staff, OAQ, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana, 46204-2251 at 317-234-5373 or 1-800-451-6027, and ask for extension 4-5373.

Sincerely,

Iryn Calilung, Section Chief  
Permits Branch  
Office of Air Quality

Attachments: Modified Permit and Technical Support Document

cc: File - Hamilton County  
Hamilton County Health Department  
U.S. EPA, Region 5  
Compliance and Enforcement Branch



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DRAFT

Part 70 Operating Permit Renewal

OFFICE OF AIR QUALITY

Industrial Dielectrics, Inc. dba IDI Composites International  
407 S 7th Street  
Noblesville, IN 46061

(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.: T057-31912-00042	
Issued by: Original Signed Chrystal A. Wagner, Section Chief Permits Branch, Office of Air Quality	Issuance Date: August 5, 2013  Expiration Date: August 5, 2018
Administrative Amendment No.: 057-35499-00042 Significant Source Modification No.: 057-36422-00042	
Significant Permit Modification No.: 057-36476-00042	
Issued by:  Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date:

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Attachment A: 40 CFR 63, Subpart WWWW – NESHAP for Reinforced Plastic Composites Production

Attachment B: 40 CFR 60, Subpart IIII – NSPS for Stationary Compression Ignition Internal Combustion Engines

## 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)]

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The Permittee owns and operates a stationary Custom Compounding of Purchased Plastic Resins.

Source Address:	407 South 7th Street, Noblesville, Indiana 46061
General Source Phone Number:	(317) 773-1766
SIC Code:	3087 (Custom Compounding of Purchased Plastic Resins)
County Location:	Hamilton
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Operating Permit Program Minor Source, under PSD Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

- (a) One (1) 39" sheet molding compound (SMC) line, identified as SMC Line 2, consisting of a Large Mixer, constructed in 2002, relocated from the laboratory, also including other mixers where pigment and thickeners are added, for SMC production, and the 39" SMC machine. The maximum throughput is 5,832 pounds per hour, with PM emissions from the Large Mixer and glass chopper controlled by a baghouse B2, exhausting to stack S2.

Under 40 CFR 63, Subpart WWWW, this is considered a sheet molding compound manufacturing operation.

- (b) One (1) sheet molding compound (SMC) mixer, identified as SMC Drum Mixer, constructed prior to 1980, for (SMC) production. The maximum throughput is 1,200 pounds per hour, with PM emissions controlled by SMC Baghouse B2 exhausting to stack S2.

Under 40 CFR 63, Subpart WWWW, this is considered a sheet molding compound manufacturing operation.

- (c) One (1) 48" sheet molding compound (SMC) line, identified as SMC Line 1, consisting of a Large Mixer, originally constructed prior to 1980 and modified in 2012, also including other mixers where pigment and thickener are added, for SMC production, and the 48" SMC Machine. The maximum throughput is 7,200 pounds per hour, with PM emissions from the Large Mixer and glass chopper controlled by SMC baghouse B2 exhausting to stack S2.

Under 40 CFR 63, Subpart WWWW, this is considered a sheet molding compound manufacturing operation.

- (d) Six (6) bulk molding compound (BMC) mixers, identified as BMC Mixer #1 through BMC Mixer #5, constructed after 1980, and BMC Mixer #6, constructed in 2008, for bulk molding compound (BMC) production, with BMC Mixer #1 through BMC Mixer #5 each having a maximum throughput of 1,200 pounds per hour, and BMC Mixer #6 having a maximum throughput of 2,200 lbs/hr, with PM emissions from all BMC mixers controlled by BMC Baghouse B1 and all exhausting to stack S1.

Under 40 CFR 63, Subpart WWWW, this is considered a bulk molding compound manufacturing operation.

The BMC mixer process description also include a Filler Cut Scale for weighing filler powders used in each mixer, with a maximum throughput of 492 pounds per hour, with PM emissions also controlled by BMC Baghouse B1 exhausting to Stack S1. Also included is the final packaging operations associated with the BMC material from these mixers, including two (2) compound feeders and six (6) extruders used to package BMC material for shipping, with no emission controls.

- (e) Four (4) bulk molding compound (BMC) mixers, identified as Rosite Mixer #L1 through Rosite Mixer #L4, constructed in 2005, for Rosite production, each with a maximum capacity of 1,000 pounds per hour with PM emissions from all Rosite mixers controlled by SMC baghouse B2, exhausting to Stack S2.

Under 40 CFR 63, Subpart WWWW, this is considered a bulk molding compound manufacturing operation.

The Rosite mixer process description also include a Filler Cut Scale for weighing filler powders used in each mixer, with a maximum throughput of 2,400 pounds per hour, with PM emissions also controlled by SMC Baghouse B2 exhausting to Stack S2. Also included is the Rosite Resin Blending Mixer used to blend resins for the Rosite mixers, with no emission controls.

- (f) One (1) electric oven, identified as O3, approved for construction in 2013, for treatment of unusable raw materials prior to disposal, with a maximum capacity of 1,600 pounds per hour, with no emission controls and exhausting to Stack S6.
- (g) One (1) 36" sample sheeting molding compound (SMC) line, identified as SMC Line 3, utilizing a dedicated mixer referred to as SMC Drum Mixer #2, and the 36" SMC Machine, approved in 2016 for construction in the Technical Development Center, for SMC production. The maximum throughput is 5,385 pounds per hour, with PM emissions from the mixer and glass chopper controlled by Tech Center baghouse B4, exhausting to stack S4.

Under 40 CFR 63, Subpart WWWW, this is considered a sheet molding compound manufacturing operation.

- (h) One (1) independent SMC mixer, typically located in the Technical Development Center, identified as Mixer #26, approved in 2016 for construction, with a maximum throughput of 50 pounds per hour, with no pollution control equipment and exhausting inside the building.

Under 40 CFR 63, Subpart WWWW, this is considered a sheet molding compound manufacturing 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)]

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

- (a) One (1) laboratory bulk molding compound (BMC) mixer, identified as Rosite Mixer #16, constructed in 2005, for Rosite production, with a maximum throughput of 10 pounds per hour, to model the operation of Rosite Mixer #11 through Rosite #14 with no emission controls.

Under 40 CFR 63, Subpart WWWW, this is considered a bulk molding compound manufacturing operation.

- (b) Four (4) laboratory bulk molding compound (BMC) mixers, identified as BMC Mixer #17 through BMC Mixer #20, for BMC production, with BMC Mixer #17 and BMC Mixer #18 each having a maximum throughput of 150 pounds per hour, with PM emissions controlled by Lab Baghouse B3 exhausting to stack S3, and BMC Mixer #19 and BMC Mixer #20, each having a maximum throughput of 20 pounds per hour, with no emission controls.

Under 40 CFR 63, Subpart WWWW, this is considered a bulk molding compound manufacturing operation.

- (c) One (1) Vazo Blender, constructed in 2005, with a maximum throughput of 180 batches of material per year, with each batch composed of 758 pounds of raw materials, with PM emissions controlled by Vazo Baghouse B5, exhausting to Stack S5.

[40 CFR Part 63, Subpart WWWW]

- (d) Three (3) SMC laboratory mixers identified as Mixer #23, Mixer #24, with a maximum capacity of 50 lbs/hr, and Mixer #25 with a maximum process capacity of 15 lbs/hr with no pollution control equipment and exhausting inside the building.

[40 CFR Part 63, Subpart WWWW]

- (e) One (1) PolyM Dispersion Mixer, used to set up scrap SMC and BMC material through polymerization, with no pollution control equipment and exhausting inside the building.

[40 CFR Part 63, Subpart WWWW]

- (f) QA/QC process involving laboratory testing and sample molding presses, with no pollution control equipment and exhausting inside the building.

[40 CFR Part 63, Subpart WWWW]

- (g) Cleaning solvent identified as S-0280 Super Flush having a vapor pressure equal to or less than 0.7kPa;5mmHg; or 0.1 psi measured at 20°C (68°F).

- (h) The following equipment related to manufacturing activities not resulting in the emission of HAPs: cutting torches, soldering equipment, welding equipment.

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

- (j) Paved and unpaved roads and parking lots with public access.

- (k) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower
- (l) Stationary fire pumps.
- (m) A laboratory as defined in 326 IAC 2-7-1(21)(G), which includes the following:
  - 1. Two (2) small laboratory extruders, with no pollution control equipment and exhausting inside the building.
- (n) Ten (10) aboveground polyester resin storage tanks, identified as T<sub>1</sub> through T<sub>11</sub>. Tanks T<sub>1</sub> through T<sub>6</sub> have a maximum capacity of 7,200 gallons, , and tanks T<sub>8</sub> through T<sub>11</sub> each have a capacity of 5,400 gallons. Each aboveground tank is equipped with one vent and each has the potential to emit less than 1 ton VOC/year. Tank identified as T<sub>7</sub> was never installed.
- (o) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.
- (p) Two (2) saws, identified as SA<sub>1</sub> and SA<sub>2</sub>, for plastic sheet production, each with a maximum capacity of 20 pounds per hour, with no emission controls and no outside exhaust.
- (q) One (1) stationary emergency generator burning diesel fuel, with a maximum output of 10 KW, manufactured in 2012.  
  
Under 40 CFR 60, Subpart IIII, this is an affected unit.
- (r) One (1) compression molding press, identified as #1, approved in 2015 for construction, with a maximum through put of fifty (50) pounds of BMC or SMC per hour, using no control and exhausting to the indoors.  
  
Under 40 CFR 63, Subpart WWWW, this is an affected unit.
- (s) One (1) compression molding press, identified as #2, approved in 2015 for construction, with a maximum through put of fifty (50) pounds of BMC or SMC per hour, using no control and exhausting to the indoors.  
  
Under 40 CFR 63, Subpart WWWW, this is an affected unit.
- (t) One (1) compression molding press, identified as #3, approved in 2016 for construction, with a maximum through put of fifty (50) pounds of BMC or SMC per hour, using no control and exhausting to the indoors.  
  
Under 40 CFR 63, Subpart WWWW, this is an affected unit.
- (u) One (1) compression molding press, identified as #4, approved in 2016 for construction, with a maximum through put of fifty (50) pounds of BMC or SMC per hour, using no control and exhausting to the indoors.  
  
Under 40 CFR 63, Subpart WWWW, this is an affected unit.
- (v) One (1) compression molding press, identified as #5, approved in 2016 for construction, with a maximum through put of fifty (50) pounds of BMC or SMC per hour, using no control and exhausting to the indoors.

Under 40 CFR 63, Subpart WWWW, this is an affected unit.

- (w) One small SMC extruder, located in the SMC-FG Warehouse, identified as SMC Extruder #3, approved in 2016 for construction, with no pollution control equipment and exhausting inside the building.

Under 40 CFR 63, Subpart WWWW, this is an affected unit.

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).
- (c) It is an affected source under Title IV (Acid Deposition Control) of the Clean Air Act, as defined in 326 IAC 2-7-1(3);

## SECTION B GENERAL CONDITIONS

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

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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)]

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- (a) This permit, 057-31912-00042, 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 or of permits issued pursuant to Title IV of the Clean Air Act and 326 IAC 21 (Acid Deposition Control).
- (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]

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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]

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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)]

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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)]

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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)]

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- (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. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than July 1 of each year to:

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

and

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

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

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

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

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

- (a) If required by specific condition(s) in Section D of this permit, 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.

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

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

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

affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

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

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

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

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

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

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

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

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

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

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

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

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

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

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

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

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

- (a) All terms and conditions of permits established prior to 057-31912-00042 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 combined permit, all previous registrations and permits are superseded by this combined new source review and part 70 operating permit, except for permits issued pursuant to Title IV of the Clean Air Act and 326 IAC 21 (Acid Deposition Control)

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

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

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

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
  - (1) That this permit contains a material mistake.

- (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
- (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

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

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(42). The renewal application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

Request for renewal shall be submitted to:

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

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

B.17 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12] [40 CFR 72]

- (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) Pursuant to 326 IAC 2-7-11(b) and 326 IAC 2-7-12(a), administrative Part 70 operating permit amendments and permit modifications for purposes of the acid rain portion of a Part 70 permit shall be governed by regulations promulgated under Title IV of the Clean Air Act. [40 CFR 72]

(c) 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).

(d) 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)]

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(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]**

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

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

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

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

(4) The Permittee notifies the:

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

and

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

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

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

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

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(37)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

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

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

- (c) Emission Trades [326 IAC 2-7-20(c)]  
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ or U.S. EPA is required.

- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.
- (f) This condition does not apply to emission trades of SO<sub>2</sub> or NO<sub>x</sub> under 326 IAC 21 or 326 IAC 10-4.

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

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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]**

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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]**

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- (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]**

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- (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]**

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

## SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

C.2 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

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

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

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

All required notifications shall be submitted to:

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

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

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

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

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

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

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

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

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

## Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

### C.9 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)][40 CFR 64][326 IAC 3-8]

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

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

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

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

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

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

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

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

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

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

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval 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 180 days from the date on which this source commences operation.

The ERP 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) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.12 Risk Management Plan [326 IAC 2-7-5(11)] [40 CFR 68]

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

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

- (l) Upon detecting an excursion where a response step is required by the D Section, or an exceedance of a limitation, not subject to CAM, in this permit:
  - (a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.
  - (b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:
    - (1) initial inspection and evaluation;
    - (2) recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system); or
    - (3) any necessary follow-up actions to return operation to normal or usual manner of operation.
  - (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
    - (1) monitoring results;

- (2) review of operation and maintenance procedures and records; and/or
    - (3) inspection of the control device, associated capture system, and the process.
  - (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
  - (e) The Permittee shall record the reasonable response steps taken.
- (II)
  - (a) *CAM Response to excursions or exceedances.*
    - (1) Upon detecting an excursion or exceedance, subject to CAM, the Permittee shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
    - (2) Determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.
  - (b) If the Permittee identifies a failure to achieve compliance with an emission limitation, subject to CAM, or standard, subject to CAM, for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the Permittee shall promptly notify the IDEM, OAQ and, if necessary, submit a proposed significant permit modification to this permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.
  - (c) Based on the results of a determination made under paragraph (II)(a)(2) of this condition, the EPA or IDEM, OAQ may require the Permittee to develop and implement a Quality Improvement Plan (QIP). The Permittee shall develop and implement a QIP if notified to in writing by the EPA or IDEM, OAQ.
  - (d) Elements of a QIP:  
The Permittee shall maintain a written QIP, if required, and have it available for inspection. The plan shall conform to 40 CFR 64.8 b (2).

- (e) If a QIP is required, the Permittee shall develop and implement a QIP as expeditiously as practicable and shall notify the IDEM, OAQ if the period for completing the improvements contained in the QIP exceeds 180 days from the date on which the need to implement the QIP was determined.
- (f) Following implementation of a QIP, upon any subsequent determination pursuant to paragraph (II)(c) of this condition the EPA or the IDEM, OAQ may require that the Permittee make reasonable changes to the QIP if the QIP is found to have:
  - (1) Failed to address the cause of the control device performance problems; or
  - (2) Failed to provide adequate procedures for correcting control device performance problems as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
- (g) Implementation of a QIP shall not excuse the Permittee from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting or recordkeeping requirement that may apply under federal, state, or local law, or any other applicable requirements under the Act.
- (h) *CAM recordkeeping requirements.*
  - (1) The Permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to paragraph (II)(c) of this condition and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under this condition (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions). Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.
  - (2) Instead of paper records, the owner or operator may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review, and does not conflict with other applicable recordkeeping requirements

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

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

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

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

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

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

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

The statement must be submitted to:

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

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

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

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. Support information includes the following, where applicable:

- (AA) All calibration and maintenance records.
- (BB) All original strip chart recordings for continuous monitoring instrumentation.
- (CC) Copies of all reports required by the Part 70 permit.

Records of required monitoring information include the following, where applicable:

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

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

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

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

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

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

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

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

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

- (b) The address for report submittal is:

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

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) The first report shall cover the period commencing on the date of issuance of this permit or the date of initial start-up, whichever is later, and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise

specified in this permit. For the purpose of this permit, "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

### **Stratospheric Ozone Protection**

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

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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) 39" sheet molding compound (SMC) line, identified as SMC Line 2, consisting of a Large Mixer, constructed in 2002, relocated from the laboratory, also including other mixers where pigment and thickeners are added, for SMC production, and the 39" SMC machine. The maximum throughput is 5,832 pounds per hour, with PM emissions from the Large Mixer and glass chopper controlled by SMC baghouse B2, exhausting to stack S2.

Under 40 CFR 63, Subpart WWWW, this is considered a sheet molding compound manufacturing operation.

- (b) One (1) sheet molding compound (SMC) mixer, identified as SMC Drum Mixer, constructed prior to 1980, for (SMC) production. The maximum throughput is 1,200 pounds per hour, with PM emissions controlled by SMC Baghouse B2 exhausting to stack S2.

Under 40 CFR 63, Subpart WWWW, this is considered a sheet molding compound manufacturing operation.

- (c) One (1) 48" sheet molding compound (SMC) line, identified as SMC Line 1, consisting of a Large Mixer, originally constructed prior to 1980 and modified in 2012, also including other mixers where pigment and thickener are added, for SMC production, and the 48" SMC Machine. The maximum throughput is 7,200 pounds per hour, with PM emissions from the Large Mixer and glass chopper controlled by SMC baghouse B2 exhausting to stack S2.

Under 40 CFR 63, Subpart WWWW, this is considered a sheet molding compound manufacturing operation.

- (d) Six (6) bulk molding compound (BMC) mixers, identified as BMC Mixer #1 through BMC Mixer #5, constructed after 1980, and BMC Mixer #6, constructed in 2008, for bulk molding compound (BMC) production, with BMC Mixer #1 through BMC Mixer #5 each having a maximum throughput of 1,200 pounds per hour, and BMC Mixer #6 having a maximum throughput of 2,200 lbs/hr, with PM emissions from all BMC mixers controlled by BMC Baghouse B1 and all exhausting to stack S1.

Under 40 CFR 63, Subpart WWWW, this is considered a bulk molding compound manufacturing operation.

The BMC mixer process description also include a Filler Cut Scale for weighing filler powders used in each mixer, with a maximum throughput of 492 pounds per hour, with PM emissions also controlled by BMC Baghouse B1 exhausting to Stack S1. Also included is the final packaging operations associated with the BMC material from these mixers, including two (2) compound feeders and six (6) extruders used to package BMC material for shipping, with no emission controls.

- (e) Four (4) bulk molding compound (BMC) mixers, identified as Rosite Mixer #L1 through Rosite Mixer #L4, constructed in 2005, for Rosite production, each with a maximum capacity of 1,000 pounds per hour with PM emissions from all Rosite mixers controlled by SMC baghouse B2, exhausting to Stack S2.

Under 40 CFR 63, Subpart WWWW, this is considered a bulk molding compound manufacturing operation.

The Rosite mixer process description also include a Filler Cut Scale for weighing filler powders used in each mixer, with a maximum throughput of 2,400 pounds per hour, with PM emissions also controlled by SMC Baghouse B2 exhausting to Stack S2. Also included is the Rosite Resin Blending Mixer used to blend resins for the Rosite mixers, with no emission controls.

- (g) One (1) 36" sample sheeting molding compound (SMC) line, identified as SMC Line 3, utilizing a dedicated mixer referred to as SMC Drum Mixer #2, and the 36" SMC Machine, approved in 2016 for construction in the Technical Development Center, for SMC production. The maximum throughput is 5,385 pounds per hour, with PM emissions from the mixer and glass chopper controlled by Tech Center baghouse B4, exhausting to stack S4.

Under 40 CFR 63, Subpart WWWW, this is considered a sheet molding compound manufacturing operation.

- (h) One (1) independent SMC mixer, typically located in the Technical Development Center, identified as Mixer #26, approved in 2016 for construction, with a maximum throughput of 50 pounds per hour, with no pollution control equipment and exhausting inside the building.

Under 40 CFR 63, Subpart WWWW, this is considered a sheet molding compound manufacturing operation.

#### Insignificant Activities

- (a) One (1) laboratory bulk molding compound (BMC) mixer, identified as Rosite Mixer #16, constructed in 2005, for Rosite production, with a maximum throughput of 10 pounds per hour, to model the operation of Rosite Mixer #11 through Rosite #14 with no emission controls.

Under 40 CFR 63, Subpart WWWW, this is considered a bulk molding compound manufacturing operation.

- (b) Four (4) laboratory bulk molding compound (BMC) mixers, identified as BMC Mixer #17 through BMC Mixer #20, constructed prior to 1980, for BMC production, with BMC Mixer #17 and BMC Mixer #18 each having a maximum throughput of 150 pounds per hour, with PM emissions controlled by Lab Baghouse B3 exhausting to stack S3, and BMC Mixer #19 and BMC Mixer #20, each having a maximum throughput of 20 pounds per hour, with no emission controls.

Under 40 CFR 63, Subpart WWWW, this is considered a bulk molding compound manufacturing operation.

- (c) One (1) Vazo Blender, constructed in 2005, with a maximum throughput of 180 batches of material per year, with each batch composed of 758 pounds of raw materials, with PM emissions controlled by Vazo Baghouse B5, exhausting to Stack S5.

[40 CFR Part 63, Subpart WWWW]

- (d) Three (3) SMC laboratory mixers identified as Mixer #23, Mixer #24, with a maximum capacity of 50 lbs/hr, and Mixer #25 with a maximum process capacity of 15 lbs/hr with no pollution control equipment and exhausting inside the building.  
  
[40 CFR Part 63, Subpart WWWW]
  - (e) One (1) PolyM Dispersion Mixer, used to set up scrap SMC and BMC material through polymerization, with no pollution control equipment and exhausting inside the building.  
  
[40 CFR Part 63, Subpart WWWW]
  - (f) QA/QC process involving laboratory testing and sample molding presses, with no pollution control equipment and exhausting inside the building.  
  
[40 CFR Part 63, Subpart WWWW]
- (The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

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

**D.1.1 PSD Minor Limits [326 IAC 2-2]**

In order to render the requirements of 326 IAC 2-2 (PSD) not applicable, the Permittee shall comply with the following:

- (a) The PM, PM10, and PM2.5 emissions from each emission unit identified in the table below shall not exceed its specified limit:

<b>Emission Unit</b>	<b>PM limit (pounds per hour)</b>	<b>PM10 limit (pounds per hour)</b>	<b>PM2.5 limit (pounds per hour)</b>
SMC Drum Mixer	2.91	2.91	2.91
39" SMC Line Large Mixer	8.40	8.40	8.40
48" SMC Line Large Mixer	9.67	9.67	9.67
36" SMC Line/ SMC Drum Mixer #2	7.96	7.96	7.96
SMC Mixer 26 (5-gal pail)	0.19	0.19	0.19
BMC Mixer #1	2.91	2.91	2.91
BMC Mixer #2	2.91	2.91	2.91
BMC Mixer #3	2.91	2.91	2.91
BMC Mixer #4	2.91	2.91	2.91
BMC Mixer #5	2.91	2.91	2.91
BMC Mixer #6	4.37	4.37	4.37
BMC Mixer #11	2.58	2.58	2.58
BMC Mixer #12	2.58	2.58	2.58
BMC Mixer #13	2.58	2.58	2.58
BMC Mixer #14	2.58	2.58	2.58
BMC Mixer #15	0.551	0.551	0.551
BMC Mixer #17	0.551	0.551	0.551
BMC Mixer #18	0.551	0.551	0.551

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

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

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations, Work Practices and Control Technologies), the allowable PM emission rate from the fiberglass facilities shall not exceed the rates outlined below:

Facility	P = Process Weight tons/hr	E = Allowable Emissions lbs/hr
SMC Drum Mixer	0.6	2.91
39" SMC Line 2	2.92	8.40
48" SMC Line 1	3.60	9.67
36" SMC Line/SMC Drum Mixer #2	2.69	7.96
SMC Mixer 26 (5-gal pail)	0.01	0.19
BMC Mixer #1	0.6	2.91
BMC Mixer #2	0.6	2.91
BMC Mixer #3	0.6	2.91
BMC Mixer #4	0.6	2.91
BMC Mixer #5	0.6	2.91
BMC Mixer #6	1.1	4.37
Rosite Mixer #L11	0.50	2.58
Rosite Mixer #L12	0.50	2.58
Rosite Mixer #L13	0.50	2.58
Rosite Mixer #L14	0.50	2.58
BMC Mixer #15	0.05	0.551
BMC Mixer #17	0.075	0.551
BMC Mixer #18	0.075	0.551

The pounds per hour PM limitations shall be calculated with the following equation:

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

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

**D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(12)]**

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

**Compliance Determination Requirements [326 IAC 2-7-5(1)]**

**D.1.4 Particulate Matter (PM)**

- (a) In order to comply with Conditions D.1.1 and D.1.2, the SMC baghouse B2 shall be in operation at all times when raw material is being added into or blended product is being removed from the SMC mixers associated with the 39" SMC Line, the 48" SMC Line and the SMC Drum Mixer, as well as the BMC mixers for Rosite production identified as Rosite Mixer #L1 through Rosite Mixer #L4.
- (b) In order to comply with Conditions D.1.1 and D.1.2, the BMC Baghouse B1 shall be in operation at all times when raw material is being added into or blended product is being removed from the BMC mixers identified as BMC Mixer #1 through BMC Mixer #6.

- (c) In order to comply with Conditions D.1.1 and D.1.2, the Lab Baghouse B3 shall be in operation at all times when raw material is being added into or blended product is being removed from the BMC laboratory mixers identified as BMC Mixer #17 and BMC Mixer #18.
- (d) In order to comply with Conditions D.1.1 and D.1.2, the Tech Center Baghouse B4 shall be in operation at all times when raw material is being added into or blended product is being removed from the SMC Drum Mixer #2 associated with the 36" SMC Line, identified as SMC Line 3.
- (e) In the event that bag failure is observed in a multi-compartment dust collector, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

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

#### **D.1.5 Visible Emissions Notations [40 CFR 64]**

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- (a) Visible emission notations of the stack exhausts of BMC Baghouse B1 exhausting through Stack S1, SMC Baghouse B2 exhausting through Stack S2, and Lab Baghouse B3 exhausting through Stack S3, shall be performed once per day during normal daylight operations. Visible emission notations of the stack exhausts of the Tech Center Baghouse B4 exhausting to Stack S4 are not required due to the slightly lower level of PM emissions from the new SMC Line 3. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

#### **D.1.6 Parametric Monitoring [40 CFR 64]**

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The Permittee shall record the pressure drop across the baghouses B1, B2, B3, and B4 at least once per day when the processes are in operation and exhausting to the atmosphere. When for any one reading, the pressure drop across the dust collector is outside the normal range the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. The normal range for this dust collector is a pressure drop range between 0.2 and 6.0 inches of water unless a different upper-bound or lower-bound value for this range is determined during the most recent valid stack test. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a

deviation from this permit.

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

#### D.1.7 Broken or Failed Bag Detection

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

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

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

#### D.1.8 Record Keeping Requirements

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- (a) To document the compliance status with Condition D.1.5 - Visible Emission Notation, the Permittee shall maintain records of visible emission notations of BMC Baghouse B1 exhausting through Stack S1, SMC Baghouse B2 exhausting through Stack S2, and Lab Baghouse B3 exhausting through Stack S3 once per day. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).
- (b) To document the compliance status with Condition D.1.6 - Parametric Monitoring, the Permittee shall maintain records once per day of the pressure drop across the baghouses B1, B2, B3, and B4 during normal operation when venting to the atmosphere. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that day).
- (c) Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to the records required by this condition.

## SECTION E.1

## FACILITY OPERATION CONDITIONS

### Emissions Unit Description:

#### Facility Description [326 IAC 2-7-5(15)]:

- (a) One (1) 39" sheet molding compound (SMC) line, identified as SMC Line 2, consisting of a Large Mixer, constructed in 2002, relocated from the laboratory, also including other mixers where pigment and thickeners are added, for SMC production, and the 39" SMC machine. The maximum throughput is 5,832 pounds per hour, with PM emissions from the Large Mixer and glass chopper controlled by SMC baghouse B2, exhausting to stack S2.

Under 40 CFR 63, Subpart WWWW, this is considered a sheet molding compound manufacturing operation.

- (b) One (1) sheet molding compound (SMC) mixer, identified as SMC Drum Mixer, constructed prior to 1980, for (SMC) production. The maximum throughput is 1,200 pounds per hour, with PM emissions controlled by SMC Baghouse B2 exhausting to stack S2.

Under 40 CFR 63, Subpart WWWW, this is considered a sheet molding compound manufacturing operation.

- (c) One (1) 48" sheet molding compound (SMC) line, identified as SMC Line 1, consisting of a Large Mixer, originally constructed prior to 1980 and modified in 2012, also including other mixers where pigment and thickener are added, for SMC production, and the 48" SMC Machine. The maximum throughput is 7,200 pounds per hour, with PM emissions from the Large Mixer and glass chopper controlled by SMC baghouse B2 exhausting to stack S2.

Under 40 CFR 63, Subpart WWWW, this is considered a sheet molding compound manufacturing operation.

- (d) Six (6) bulk molding compound (BMC) mixers, identified as BMC Mixer #1 through BMC Mixer #5, constructed after 1980, and BMC Mixer #6, constructed in 2008, for bulk molding compound (BMC) production, with BMC Mixer #1 through BMC Mixer #5 each having a maximum throughput of 1,200 pounds per hour, and BMC Mixer #6 having a maximum throughput of 2,200 lbs/hr, with PM emissions from all BMC mixers controlled by BMC Baghouse B1 and all exhausting to stack S1.

Under 40 CFR 63, Subpart WWWW, this is considered a bulk molding compound manufacturing operation.

The BMC mixer process description also include a Filler Cut Scale for weighing filler powders used in each mixer, with a maximum throughput of 492 pounds per hour, with PM emissions also controlled by BMC Baghouse B1 exhausting to Stack S1. Also included is the final packaging operations associated with the BMC material from these mixers, including two (2) compound feeders and six (6) extruders used to package BMC material for shipping, with no emission controls.

- (e) Four (4) bulk molding compound (BMC) mixers, identified as Rosite Mixer #L1 through Rosite Mixer #L4, constructed in 2005, for Rosite production, each with a maximum capacity of 1,000 pounds per hour with PM emissions from all Rosite mixers controlled by SMC baghouse B<sub>2</sub>, exhausting to Stack S2.

Under 40 CFR 63, Subpart WWWW, this is considered a bulk molding compound manufacturing operation.

The Rosite mixer process description also includes a Filler Cut Scale for weighing filler powders used in each mixer, with a maximum throughput of 2,400 pounds per hour, with PM emissions also controlled by SMC Baghouse B2 exhausting to Stack S2. Also included is the Rosite Resin Blending Mixer used to blend resins for the Rosite mixers, with no emission controls.

- (g) One (1) 36" sample sheeting molding compound (SMC) line, identified as SMC Line 3, utilizing a dedicated mixer referred to as SMC Drum Mixer #2, and the 36" SMC Machine, approved in 2016 for construction in the Technical Development Center, for SMC production. The maximum throughput is 5,385 pounds per hour, with PM emissions from the mixer and glass chopper controlled by Tech Center baghouse B4, exhausting to stack S4.

Under 40 CFR 63, Subpart WWWW, this is considered a sheet molding compound manufacturing operation.

- (h) One (1) independent SMC mixer, typically located in the Technical Development Center, identified as Mixer #26, approved in 2016 for construction, with a maximum throughput of 50 pounds per hour, with no pollution control equipment and exhausting inside the building.

Under 40 CFR 63, Subpart WWWW, this is considered a sheet molding compound manufacturing operation.

#### Insignificant Activities

- (a) One (1) laboratory bulk molding compound (BMC) mixer, identified as Rosite Mixer #16, constructed in 2005, for Rosite production, with a maximum throughput of 10 pounds per hour, to model the operation of Rosite Mixer #11 through Rosite #14 with no emission controls.

Under 40 CFR 63, Subpart WWWW, this is considered a bulk molding compound manufacturing operation.

- (b) Four (4) laboratory bulk molding compound (BMC) mixers, identified as BMC Mixer #17 through BMC Mixer #20, constructed prior to 1980, for BMC production, with BMC Mixer #17 and BMC Mixer #18 each having a maximum throughput of 150 pounds per hour, with PM emissions controlled by Lab Baghouse B3 exhausting to stack S3, and BMC Mixer #19 and BMC Mixer #20, each having a maximum throughput of 20 pounds per hour, with no emission controls.

Under 40 CFR 63, Subpart WWWW, this is considered a bulk molding compound manufacturing operation.

- (c) One (1) Vazo Blender, constructed in 2005, with a maximum throughput of 180 batches of material per year, with each batch composed of 758 pounds of raw materials, with PM emissions controlled by Vazo Baghouse B5, exhausting to Stack S5.

[40 CFR Part 63, Subpart WWWW]

- (d) Three (3) SMC laboratory mixers identified as Mixer #23, Mixer #24, with a maximum capacity of 50 lbs/hr, and Mixer #25 with a maximum process capacity of 15 lbs/hr with no pollution control equipment and exhausting inside the building.

[40 CFR Part 63, Subpart WWWW]

- (e) One (1) PolyM Dispersion Mixer, used to set up scrap SMC and BMC material through polymerization, with no pollution control equipment and exhausting inside the building.

[40 CFR Part 63, Subpart WWWW]

- (f) QA/QC process involving laboratory testing and sample molding presses, with no pollution control equipment and exhausting inside the building.

[40 CFR Part 63, Subpart WWWW]

- (g) One (1) compression molding press, identified as #1, approved in 2015 for construction, with a maximum through put of fifty (50) pounds of BMC or SMC per hour, using no control and exhausting to the indoors.

Under 40 CFR 63, Subpart WWWW, this is an affected unit.

- (h) One (1) compression molding press, identified as #2, approved in 2015 for construction, with a maximum through put of fifty (50) pounds of BMC or SMC per hour, using no control and exhausting to the indoors.

Under 40 CFR 63, Subpart WWWW, this is an affected unit.

- (i) One (1) compression molding press, identified as #3, approved in 2016 for construction, with a maximum through put of fifty (50) pounds of BMC or SMC per hour, using no control and exhausting to the indoors.

Under 40 CFR 63, Subpart WWWW, this is an affected unit.

- (j) One (1) compression molding press, identified as #4, approved in 2016 for construction, with a maximum through put of fifty (50) pounds of BMC or SMC per hour, using no control and exhausting to the indoors.

Under 40 CFR 63, Subpart WWWW, this is an affected unit.

- (k) One (1) compression molding press, identified as #5, approved in 2016 for construction, with a maximum through put of fifty (50) pounds of BMC or SMC per hour, using no control and exhausting to the indoors.

Under 40 CFR 63, Subpart WWWW, this is an affected unit.

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

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

- (a) Pursuant to 40 CFR 63.1 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, for the emission unit(s) listed above, except as otherwise specified in 40 CFR Part 63, Subpart WWWW.

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

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- (a) The Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart WWWW (included as Attachment A to this operating permit), which are incorporated by reference as 326 IAC 20-1, for the emission unit(s) listed above:
- (1) 40 CFR 63.5800
  - (2) 40 CFR 63.5805(a)
  - (3) 40 CFR 63.5830(b)
  - (4) 40 CFR 63.5835(a) and (c)
  - (5) 40 CFR 63.5840
  - (6) 40 CFR 63.5860(a)
  - (7) 40 CFR 63.5895(b) and (e)
  - (8) 40 CFR 63.5900(a)(4),(b), and (e)
  - (9) 40 CFR 63.5905
  - (10) 40 CFR 63.5910(a),(b),(c),(d),(g) and (h)
  - (11) 40 CFR 63.5915(a) and (d)
  - (12) 40 CFR 63.5920
  - (13) 40 CFR 63.5925
  - (14) 40 CFR 63.5930
  - (15) 40 CFR 63.5935
  - (16) Table 1 to 40 CFR 63 Subpart WWWW (the applicable portions)
  - (17) Table 3 to 40 CFR 63 Subpart WWWW (the applicable portions)
  - (18) Table 4 to 40 CFR 63 Subpart WWWW (the applicable portions)
  - (19) Table 5 to 40 CFR 63 Subpart WWWW (the applicable portions)
  - (20) Table 7 to 40 CFR 63 Subpart WWWW (the applicable portions)
  - (21) Table 8 to 40 CFR 63 Subpart WWWW (the applicable portions)
  - (22) Table 9 to 40 CFR 63 Subpart WWWW (the applicable portions)
  - (23) Table 13 to 40 CFR 63 Subpart WWWW (the applicable portions)
  - (24) Table 14 to 40 CFR 63 Subpart WWWW (the applicable portions)

## SECTION E.2 EMISSIONS UNIT OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]:

#### Insignificant Activities

- (r) one (1) stationary emergency generator burning diesel fuel, with a maximum output of 10 KW, manufactured in 2012.

Under 40 CFR 60, Subpart IIII, this is an affected unit.

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

#### E.2.1 General Provisions Relating to NSPS Subpart IIII [326 IAC 12] [40 CFR Part 60, Subpart IIII]

- (a) Pursuant to 40 CFR 60.1, the Permittee shall comply with the provisions of 40 CFR Part 60, Subpart IIII – General Provisions, which are incorporated by reference as 326 IAC 12-1, for the emission unit(s) listed above, except as otherwise specified in 40 CFR Part 60, Subpart IIII.
- (b) Pursuant to 40 CFR 60.4, the Permittee shall submit all required notifications and reports 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

#### E.2.2 Standards of Performance for Stationary Compression Ignition Internal Combustion Engines [326 IAC 12] [40 CFR Part 60, Subpart IIII]

- (a) The Permittee shall comply with the following provisions of 40 CFR Part 60, Subpart IIII (included as Attachment B to this operating permit), which are incorporated by reference as 326 IAC 12.
  - (1) 40 CFR 60.4200(a)(2)(i),(4)
  - (2) 40 CFR 60.4205(b)
  - (3) 40 CFR 60.4206
  - (4) 40 CFR 60.4207(b)
  - (5) 40 CFR 60.4209
  - (6) 40 CFR 60.4211(a),(c),(f),(g)(1)
  - (7) 40 CFR 60.4212
  - (8) 40 CFR 60.4214(b),(c)
  - (9) 40 CFR 60.4219
  - (10) Table 2 to 40 CFR 60 Subpart IIII (the applicable portions)
  - (11) Table 4 to 40 CFR 60 Subpart IIII (the applicable portions)

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

Source Name: Industrial Dielectrics, Inc dba IDI Composites International  
Source Address: 407 South 7th Street, Noblesville, Indiana 46061  
Part 70 Permit No.: 057-36422-00042

**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: Industrial Dielectrics, Inc dba IDI Composites International  
Source Address: 407 South 7th Street, Noblesville, Indiana 46061  
Part 70 Permit No.: 057-36422-00042

**This form consists of 2 pages**

**Page 1 of 2**

- |   |
|---|
| <p><input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12)</p> <ul style="list-style-type: none"><li>• The Permittee must notify the Office of Air Quality (OAQ), within four (4) daytime business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and</li><li>• 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.</li></ul> |
|---|

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 <sub>2</sub> , VOC, NO <sub>x</sub> , 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: Industrial Dielectrics, Inc dba IDI Composites International  
 Source Address: 407 South 7th Street, Noblesville, Indiana 46061  
 Part 70 Permit No.: 057-36422-00042

**Months:** \_\_\_\_\_ **to** \_\_\_\_\_ **Year:** \_\_\_\_\_

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

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

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

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

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

**Source Description and Location**

Source Name:	Industrial Dielectrics, Inc. dba IDI Composites International
Source Location:	407 South 7th Street, Noblesville, IN 46061
County:	Hamilton County
SIC Code:	3087 (Custom Compounding of Purchased Plastic Resins)
Operation Permit No.:	T057-31912-00042
Operation Permit Issuance Date:	August 5, 2013
Significant Source Modification No.:	057-36422-00042
Significant Permit Modification No.:	057-36476-00042
Permit Reviewer:	Nicholas Eilerman

**Existing Approvals**

The source was issued Part 70 Operating Permit Renewal No. 057-31912-00042 on August 5, 2013. The source has since received the following approvals:

- (a) Administrative Amendment No. 057-35499-00042 issued on March 19, 2015.

**County Attainment Status**

The source is located in Hamilton County.

Pollutant	Designation
SO <sub>2</sub>	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O <sub>3</sub>	Unclassifiable or attainment effective July 20, 2012, for the 2008 8-hour ozone standard. <sup>1</sup>
PM <sub>2.5</sub>	Attainment effective July 11, 2013, for the annual PM <sub>2.5</sub> standard.
PM <sub>2.5</sub>	Unclassifiable or attainment effective December 13, 2009, for the 24-hour PM <sub>2.5</sub> standard.
PM <sub>10</sub>	Unclassifiable effective November 15, 1990.
NO <sub>2</sub>	Cannot be classified or better than national standards.
Pb	Unclassifiable or attainment effective December 31, 2011.

<sup>1</sup>Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005.

- (a) **Ozone Standards**  
Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) 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 NOx emissions are considered when evaluating the rule applicability relating to ozone. Hamilton County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) **PM<sub>2.5</sub>**  
Hamilton County has been classified as attainment for PM<sub>2.5</sub>. Therefore, direct PM<sub>2.5</sub>, SO<sub>2</sub>, and NOx emissions were reviewed pursuant to the requirements for Prevention of

Significant Deterioration (PSD), 326 IAC 2-2.

- (c) Other Criteria Pollutants  
 Hamilton 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 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 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:

Process/ Emission Unit	Potential To Emit of the Entire Source Prior to Modification (tons/year)								Worst Single HAP
	PM	PM <sub>10</sub> *	PM <sub>2.5</sub> **	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Total HAPs	
BMC Production	4.33	4.33	4.33	0	0	9.85	0	9.85	9.85 (Styrene)
SMC Production	7.69	7.69	7.69	0	0	52.54	0	52.54	52.54 (Styrene)
BMC Production (Rosite)	2.11	2.11	2.11	0	0	4.80	0	4.80	4.80 (Styrene)
BMC Lab	2.06	2.06	2.06	0	0	0.56	0	0.56	0.56 (Styrene)
SMC Lab	3.11	3.11	3.11	0	0	12.63	0	0.49	0.49 (Styrene)
Emergency Generator	1.04	1.04	1.04	0.97	14.83	1.21	3.19	0.01	0.003 (Acetaldehyde)
Compression Molding Press #1	0	0	0	0	0	0.48	0	0.45 (Styrene)	0.45 (Styrene)
Compression Molding Press #2	0	0	0	0	0	0.48	0	0.45 (Styrene)	0.45 (Styrene)
Total PTE of Entire Source	20.35	20.35	20.35	0.97	14.83	82.55	3.19	69.15	
Title V Major Source Thresholds	NA	100	100	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	NA	NA
*Under the Part 70 Permit program (40 CFR 70), PM10 and PM2.5, not particulate matter (PM), are each considered as a regulated air pollutant".									
**PM <sub>2.5</sub> listed is direct PM <sub>2.5</sub> .									

- (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) This existing source is a major source of HAPs, as defined in 40 CFR 63.2, because HAP emissions are greater than ten (10) tons per year for a single HAP and greater than twenty-five (25) tons per year for a combination of HAPs. Therefore, this source is a major source under Section 112 of the Clean Air Act (CAA).
- (c) These emissions are based upon calculations from the TSD of Administrative Amendment No. 057-35499-00042, issued on March 19, 2015.

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

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

#### Description of Proposed Modification

The Office of Air Quality (OAQ) has reviewed a modification application, submitted by Industrial Dielectrics on October 27, 2015, relating to the following changes:

- (1) One (1) new 36" sample SMC Line will be added to a new expansion area at the facility referred to as the Technical Development Center. This line, which will have fairly limited use since it will not be one of the main SMC production lines, will completely replace the existing 24" SMC Line located in the lab as identified in Condition A.3(n)(1) of the current permit. The new 36" SMC line will include a new SMC Machine that will be fed by a new SMC Drum Mixer.
- (2) One (1) new 5-gallon SMC mixer will be added to the Technical Development Center.
- (3) Three (3) new compression molding presses will be added that will be identical to the two compression molding presses identified as Press #1 and #2 that were recently approved as part of the Administrative Amendment #T057-35499-00042 issued by IDEM on March 19, 2015.
- (4) The facility plans to switch from the existing cleaning solvent (IDI Ship Shape) referenced in Condition A.3(g) of the current permit to a new solvent identified as S-0290 Super Flush. There will be no change in maximum annual usage of solvent due to the switch in products. Both cleaning solvents are assumed to be 100% VOC, so there will be no change in VOC emissions resulting from this new solvent. However, the unlimited potential to emit (PTE) of the existing solvent was never accounted for in the PTE calculations for the source. Therefore, IDEM will include the unlimited PTE of the new solvent in the overall PTE of this modification.
- (5) The facility no longer reclaims solvent on site, therefore, the reference to solvent recycling systems with batch capacity less than or equal to 100 gallons will be removed from the current permit.
- (6) The facility has only installed 10 of the 11 aboveground bulk storage tanks identified in Condition A.3(o) of the current permit. The tank designated as T7 with a maximum storage capacity of 6,000 gallons was never installed, so it will be removed from this condition.
- (7) One (1) new small SMC extruder that will be very similar to the two existing small BMC extruders in the lab that produces trivial emissions will be added.

The following is a list of the proposed and modified emission units:

- (a) One (1) 36" sample sheet molding compound (SMC) line, identified as SMC Line 3, utilizing a dedicated mixer referred to as SMC Drum Mixer #2, and the 36" SMC Machine, approved in 2016 for construction in the Technical Development Center, for SMC production. The maximum throughput is 5,385 pounds per hour, with PM emission from the mixer and glass chopper controlled by Tech Center baghouse B4, exhausting to stack S4.

Under 40 CFR 63, Subpart WWWW, this is considered a sheet molding compound manufacturing operation.

- (b) One (1) independent SMC mixer, typically located in the Technical Development Center, identified as Mixer #26, approved in 2016 for construction, with a maximum throughput of 50 pounds per hour, with no pollution control equipment and exhausting inside the building.

This mixer is portable and will be used with SMC Line 3 in addition to the main SMC production lines as needed. Under 40 CFR 63, Subpart WWWW, this is considered a sheet molding compound manufacturing operation.

- (c) One (1) compression molding press, identified as #3, approved in 2016 for construction, with a maximum throughput of fifty (50) pounds per hour, using no control and exhausting to the indoors.

Under 40 CFR 63, Subpart WWWW, this is an affected unit.

- (d) One (1) compression molding press, identified as #4, approved in 2016 for construction, with a maximum throughput of fifty (50) pounds per hour, using no control and exhausting to the indoors.

Under 40 CFR 63, Subpart WWWW, this is an affected unit.

- (e) One (1) compression molding press, identified as #5, approved in 2016 for construction, with a maximum throughput of fifty (50) pounds per hour, using no control and exhausting to the indoors.

Under 40 CFR 63, Subpart WWWW, this is an affected unit.

- (f) One (1) small SMC extruder, located in the SMC-FG Warehouse, identified as SMC Extruder #3, approved in 2016 for construction, with no pollution control equipment and exhausting inside the building.

Under 40 CFR 63, Subpart WWWW, this is an affected unit.

- (g) Cleaning solvent identified as S-0280 Super Flush having a vapor pressure equal to or less than 0.7kPa; 5mm Hg; or 0.1 psi measured at 20°C (68°F).

The source has removed the following emission units and insignificant activities:

- (a) Cleaning solvent identified as IDI Ship Shape having a vapor pressure equal to or less than 0.7kPa; 5mm Hg; or 0.1 psi measured at 20°C (68°F).
- (b) Solvent recycling systems with batch capacity less than or equal to 100 gallons.
- (c) One (1) 24" sheet molding compound SMC line, identified as Laboratory SMC Line 3, located in the laboratory, with no emission controls.

[40 CFR 63, Subpart WWWW]

- (d) One (1) aboveground polyester resin storage tank, identified as T<sub>7</sub>. T<sub>7</sub> has a maximum capacity of 6,000 gallons. This tank is equipped with one vent and has the potential to emit less than 1 tons VOC/year.

#### Enforcement Issues

There are no pending enforcement actions.

#### 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	146.88
PM <sub>10</sub>	146.88
PM <sub>2.5</sub>	146.88
SO <sub>2</sub>	-
VOC	32.87
CO	-
NO <sub>x</sub>	-
Single HAPs (Styrene)	22.95
Total HAPs	22.95
*The unlimited PTE includes SMC Line 3, Mixer #26, compression molding presses #3 through #5, SMC Extruder #3, and the new cleaning solvent.	

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

- (a) Significant Source Modification - Approval to Construct  
This source modification is subject to 326 IAC 2-7-10.5(g)(4)(A) because the modification has a potential to emit greater than twenty-five (25) tons per year of PM, PM<sub>10</sub>, and PM<sub>2.5</sub>.

In addition, this source modification is subject to 326 IAC 2-7-10.5(g)(4)(D) because the potential to emit VOC is greater than twenty-five (25) tons per year before control.

- (b) Significant Permit Modification - Approval to Operate  
 This modification will be incorporated into the Part 70 Operating Permit through a significant permit modification issued pursuant to 326 IAC 2-7-12(d)(1) because the modification involves significant change in permit terms or conditions (such as a case-by-case determination of emission limitations and significant changes in existing monitoring Part 70 permit terms and conditions).

**Permit Level Determination – PSD**

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

Process / Emission Unit	Project Emissions (ton/yr)						
	PM	PM <sub>10</sub>	PM <sub>2.5</sub> *	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO
36" SMC Line/ SMC Drum Mixer #2	145.53	145.53	145.53	-	-	21.38	-
SMC Mixer #26 (5-gal pail)	1.35	1.35	1.35	-	-	0.22	-
Compression Molding Press #3	-	-	-	-	-	0.48	-
Compression Molding Press #4	-	-	-	-	-	0.48	-
Compression Molding Press #5	-	-	-	-	-	0.48	-
Cleaning Solvent	-	-	-	-	-	9.92	-
SMC Extruder #3**	negl.	negl.	negl.	-	-	negl.	-
<b>Total for Modification</b>	<b>146.88</b>	<b>146.88</b>	<b>146.88</b>	-	-	<b>32.95</b>	-
PSD Major Source Thresholds	250	250	250	250	250	250	250
negl. = negligible *PM <sub>2.5</sub> listed is direct PM <sub>2.5</sub> . **SMC Extruder will generate trivial emissions since it will not involve any mixing or blending of resins or fillers.							

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\\_4q18.pdf](http://www.supremecourt.gov/opinions/13pdf/12-1146_4q18.pdf)) the United States Supreme Court ruled that the U.S. EPA does not have the authority to treat greenhouse gases (GHGs) as an air pollutant for the purpose of determining operating permit applicability or PSD Major source status. On July 24, 2014, the U.S. EPA issued a memorandum to the Regional Administrators outlining next steps in permitting decisions in light of the Supreme Court's decision. U.S. EPA's guidance states that U.S. EPA will no longer require PSD or Title V permits for sources "previously classified as 'Major' based solely on greenhouse gas emissions."

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

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

**PTE of the Entire Source After Issuance of the Modification**

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

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of the Modification Limited (tons/year)								
	PM	PM <sub>10</sub> *	PM <sub>2.5</sub> **	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Total HAPs	Worst Single HAP
BMC Production***	82.87	82.87	82.87	0	0	9.85	0	9.85	9.85 (Styrene)
SMC Production***	101.21	101.21	101.21	0	0	74.14	0	84.57	74.14 (Styrene)
BMC Production (Rosite)***	45.20	45.20	45.20	0	0	4.80	0	4.80	4.80 (Styrene)
BMC Lab***	10.59	10.59	10.59	0	0	0.56	0	12.41	0.56 (Styrene)
SMC Lab***	3.11	3.11	3.11	0	0	0.49	0	0.49	0.49 (Styrene)
Emergency Generator	1.04	1.04	1.04	0.97	14.83	1.21	3.19	0.01	0.003 (Acetaldehyde)
Compression Molding Press #1	0	0	0	0	0	0.48	0	0.45	0.45 (Styrene)
Compression Molding Press #2	0	0	0	0	0	0.48	0	0.45	0.45 (Styrene)
Compression Molding Press #3	0	0	0	0	0	0.48	0	0.45	0.45 (Styrene)
Compression Molding Press #4	0	0	0	0	0	0.48	0	0.45	0.45 (Styrene)
Compression Molding Press #5	0	0	0	0	0	0.48	0	0.45	0.45 (Styrene)
Solvent Usage	0	0	0	0	0	9.92	0	0	0
<b>Total PTE of Entire Source</b>	<b>244.02</b>	<b>244.02</b>	<b>244.02</b>	<b>0.97</b>	<b>14.83</b>	<b>100.72</b>	<b>3.19</b>	<b>102.55</b>	<b>102.53 (Styrene)</b>
Title V Major Source Thresholds	NA	100	100	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	NA	NA
<p>*Under the Part 70 Permit program (40 CFR 70), PM10 and PM2.5, not particulate matter (PM), are each considered as a regulated air pollutant".</p> <p>**PM<sub>2.5</sub> listed is direct PM<sub>2.5</sub>.</p> <p>***IDEM has updated the PM, PM10, and PM2.5 values to reflect the federally enforceable limits in the permit not the controlled PTE. The unlimited VOC calculations for the 39" and 48" SMC Line Large Mixers has been corrected due to an error in the calculations. As a result, the source-wide potential to emit VOC is now greater than 100 tons per year.</p>									

This modification to an existing PSD minor stationary source will not change the PSD minor status, because the potential to emit of all attainment regulated pollutants from the entire source will continue to be limited to less than the PSD major source threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

In order to continue to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the source shall comply with the following:

- (a) The PM, PM10, and PM2.5 emissions from each emission unit identified in the table below shall not exceed its specified limit:

Emission Unit	PM limit (pounds per hour)	PM10 limit (pounds per hour)	PM2.5 limit (pounds per hour)
SMC Drum Mixer	2.91	2.91	2.91
39" SMC Line Large Mixer	8.40	8.40	8.40
48" SMC Line Large Mixer	9.67	9.67	9.67
36" SMC Line/ SMC Drum Mixer #2	7.96	7.96	7.96
SMC Mixer 26 (5-gal pail)	0.19	0.19	0.19
BMC Mixer #1	2.91	2.91	2.91
BMC Mixer #2	2.91	2.91	2.91
BMC Mixer #3	2.91	2.91	2.91
BMC Mixer #4	2.91	2.91	2.91
BMC Mixer #5	2.91	2.91	2.91
BMC Mixer #6	4.37	4.37	4.37
BMC Mixer #11	2.58	2.58	2.58
BMC Mixer #12	2.58	2.58	2.58
BMC Mixer #13	2.58	2.58	2.58
BMC Mixer #14	2.58	2.58	2.58
BMC Mixer #15	0.551	0.551	0.551
BMC Mixer #17	0.551	0.551	0.551
BMC Mixer #18	0.551	0.551	0.551

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

**The PM emission limits are based on the 326 IAC 6-3-2 allowable PM emission rates for each emission unit. Due to this modification, new PM emission limits have been included for the new 36" SMC Line and the SMC Mixer 26. This is a Title 1 change.**

**The previous permit did not include federally enforceable PM10 and PM2.5 emission limits for the existing emission unit identified in the table above. Therefore, due to this modification IDEM is including new PM10 and PM2.5 emission limits for the existing and new emission units in order to render the requirements of 326 IAC 2-2 (PSD) not applicable. This is a Title 1 change.**

<b>Federal Rule Applicability Determination</b>
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The following federal rules are applicable to the source due to this modification:

**NSPS:**

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

**NESHAP:**

- (b) The new 36" SMC Line, SMC Mixer #26, three (3) compression molding presses (#3, #4, and #5) and one (1) SMC extruder are subject to the National Emission Standards for Hazardous Air Pollutants for Reinforced Plastic Composites Production (40 CFR 63, Subpart WWWW and 326 IAC 20-56, because these emission units produce sheet molding compound at an existing reinforced plastic composites production facility that is a major source of HAP emissions.

The emission units subject to this rule include the following:

- (a) One (1) 36" sample sheet molding compound (SMC) line, identified as SMC Line 3, utilizing a dedicated mixer referred to as SMC Drum Mixer #2, and the 36" SMC Machine, approved in 2016 for construction in the Technical Development Center, for SMC production. The maximum throughput is 5,385 pounds per hour, with PM emission from the mixer and glass chopper controlled by Tech Center baghouse B4, exhausting to stack S4.

Under 40 CFR 63, Subpart WWWW, this is considered a sheet molding compound manufacturing operation.

- (b) One (1) independent SMC mixer, typically located in the technical Development Center, identified as Mixer #26, approved in 2016 for construction, with a maximum throughput of 50 pounds per hour, with no pollution control equipment and exhausting inside the building.

This mixer is portable and will be used with SMC Line 3 in addition to the main SMC production lines as needed. Under 40 CFR 63, Subpart WWWW, this is considered a sheet molding compound manufacturing operation.

- (c) One (1) compression molding press, identified as #3, approved in 2016 for construction, with a maximum throughput of fifty (50) pounds per hour, using no control and exhausting to the indoors.

Under 40 CFR 63, Subpart WWWW, this is an affected unit.

- (d) One (1) compression molding press, identified as #4, approved in 2016 for construction, with a maximum throughput of fifty (50) pounds per hour, using no control and exhausting to the indoors.

Under 40 CFR 63, Subpart WWWW, this is an affected unit.

- (e) One (1) compression molding press, identified as #5, approved in 2016 for construction, with a maximum throughput of fifty (50) pounds per hour, using no control and exhausting to the indoors.

Under 40 CFR 63, Subpart WWWW, this is an affected unit.

- (f) One small SMC extruder, located in the SMC-FG Warehouse, identified as SMC Extruder #3, approved in 2016 for construction, with no pollution control equipment and exhausting inside the building.

Under 40 CFR 63, Subpart WWWW, this is an affected unit.

Applicable portions of the NESHAP are the following:

- (1) 40 CFR 63.5800
- (2) 40 CFR 63.5805(a)
- (3) 40 CFR 63.5830(b)
- (4) 40 CFR 63.5835(a) and (c)
- (5) 40 CFR 63.5840
- (6) 40 CFR 63.5860(a)
- (7) 40 CFR 63.5895(b) and (e)
- (8) 40 CFR 63.5900(a)(4),(b), and (e)
- (9) 40 CFR 63.5905
- (10) 40 CFR 63.5910(a),(b),(c),(d),(g) and (h)
- (11) 40 CFR 63.5915(a) and (d)
- (12) 40 CFR 63.5920
- (13) 40 CFR 63.5925
- (14) 40 CFR 63.5930

- (15) 40 CFR 63.5935
- (16) Table 1 to 40 CFR 63 Subpart WWWW (the applicable portions)
- (17) Table 3 to 40 CFR 63 Subpart WWWW (the applicable portions)
- (18) Table 4 to 40 CFR 63 Subpart WWWW (the applicable portions)
- (19) Table 5 to 40 CFR 63 Subpart WWWW (the applicable portions)
- (20) Table 7 to 40 CFR 63 Subpart WWWW (the applicable portions)
- (21) Table 8 to 40 CFR 63 Subpart WWWW (the applicable portions)
- (22) Table 9 to 40 CFR 63 Subpart WWWW (the applicable portions)
- (23) Table 13 to 40 CFR 63 Subpart WWWW (the applicable portions)
- (24) Table 14 to 40 CFR 63 Subpart WWWW (the applicable portions)

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

**CAM:**

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

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

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

CAM Applicability Analysis							
Emission Unit	Control Device Used	Emission Limitation (Y/N)	Uncontrolled PTE (ton/yr)	Controlled PTE (ton/yr)	Part 70 Major Source Threshold (ton/yr)	CAM Applicable (Y/N)	Large Unit (Y/N)
36" SMC Line/ SMC Drumer Mixer #2	Yes	No	-	-	100	No	-
SMC Mixer 26 (5- gal pail)	None	-	-	-	100	No	-
Compression Molding Press #3	None	-	-	-	100	No	-
Compression Molding Press #4	None	-	-	-	100	No	-
Compression Molding Press # 5	None	-	-	-	100	No	-
Cleaning Solvent	None	-	-	-	100	No	-
SMC Extruder #3	None	-	-	-	100	No	-

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

## State Rule Applicability Determination

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

### **326 IAC 2-2 (PSD)**

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

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

Pursuant to 326 IAC 2-4.1-1(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 40 CFR 63, Subpart WWWW.

### **SMC Line 1**

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

Due to the calculation error for the potential VOC emissions from SMC Line 1, the unlimited potential to emit VOC from SMC Line 1 is now greater than twenty-five (25) tons per year and this line was constructed after January 1, 1980. However, this line is subject to the requirements of 326 IAC 20-56. Pursuant to 326 IAC 8-1-6(3)(C), new facilities constructed after January 1, 1980 that are subject to the requirements of 326 IAC 20-56 are exempt from the requirements of 326 IAC 8-1-6. Therefore, SMC Line 1 is still not subject to the requirements of 326 IAC 8-1-6.

### **SMC Line 2**

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

Due to the calculation error for the potential VOC emissions from SMC Line 2, the unlimited potential to emit VOC from SMC Line 2 is now greater than twenty-five (25) tons per year and this line was constructed after January 1, 1980. However, this line is subject to the requirements of 326 IAC 20-56. Pursuant to 326 IAC 8-1-6(3)(C), new facilities constructed after January 1, 1980 that are subject to the requirements of 326 IAC 20-56 are exempt from the requirements of 326 IAC 8-1-6. Therefore, SMC Line 2 is still not subject to the requirements of 326 IAC 8-1-6.

### **SMC Line 3**

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

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations, Work Practices and Control Technologies), SMC Line #3 is not subject to 326 IAC 6-3-2 because the unit has potential emissions less than the allowable rate of emission for its process weight.

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

Pursuant to 326 IAC 8-1-6(1), SMC Line #3 is not subject to 326 IAC 8-1-6 because it does have a potential to emit VOC of less than 25 tons per year. In addition, this line is subject to the requirements of 326 IAC 20-56. Pursuant to 326 IAC 8-1-6(3)(C), new facilities constructed after January 1, 1980 that are subject to the requirements of 326 IAC 20-56 are exempt from the requirements of 326 IAC 8-1-6. Therefore, SMC Line 3 is not subject to the requirements of 326 IAC 8-1-6.

### **Mixer #26**

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

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations, Work Practices and Control Technologies) Mixer #26 is not subject to 326 IAC 6-3-2 because the unit has potential particulate emissions less than five hundred fifty-one thousandths (0.551) pound per hour.

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

Pursuant to 326 IAC 8-1-6(1), Mixer #26 is not subject to 326 IAC 8-1-6 because it has a potential to emit VOC of less than 25 tons per year. In addition, this mixer is subject to the requirements of 326 IAC 20-56. Pursuant to 326 IAC 8-1-6(3)(C), new facilities constructed after January 1, 1980 that are subject to the requirements of 326 IAC 20-56 are exempt from the requirements of 326 IAC 8-1-6. Therefore, Mixer #26 is not subject to the requirements of 326 IAC 8-1-6. In addition, this line is subject to the requirements of 326 IAC 20-56. Pursuant to 326 IAC 8-1-6(3)(C), new facilities constructed after January 1, 1980 that are subject to the requirements of 326 IAC 20-56 are exempt from the requirements of 326 IAC 8-1-6. Therefore, SMC Line 3 is not subject to the requirements of 326 IAC 8-1-6.

### Compression Molding Presses

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

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations, Work Practices and Control Technologies) the compression molding presses are not subject to 326 IAC 6-3-2 because each unit has potential particulate emissions less than five hundred fifty-one thousandths (0.551) pound per hour.

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

Pursuant to 326 IAC 8-1-6(1), each compression molding press are not subject to 326 IAC 8-1-6 because each have a potential to emit VOC of less than 25 tons per year.

## 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.

## Proposed Changes

The changes listed below have been made to Part 70 Operating Permit No. 057-31912-00042 Deleted language appears as ~~strike throughs~~ and new language appears in **bold**:

- (1) The emission unit descriptions in Sections A.2, A.3, D.1, and E.1 have been revised to include the new emission units and to remove the emission units that are no longer at the source.
- (2) Section D.1 has been revised to include new PM, PM10, and PM2.5 emission limits in a new Condition D.1.1.
- (3) Condition D.1.2 (formerly Condition D.1.1) has been revised to clarify that the PM emissions are only limited pursuant to 326 IAC 6-3-2 in this condition. IDEM must limit the PM emissions to render 326 IAC 2-2 (PSD) not applicable in a separate condition.

- (4) The compliance determination and monitoring requirements in Section D.1 have been revised to include new requirements.
- (5) Section D.1 has been revised to include record keeping requirements to document the compliance status with the existing compliance monitoring requirements.

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

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

- ...
- (g) One (1) 36" sample sheeting molding compound (SMC) line, identified as SMC Line 3, utilizing a dedicated mixer referred to as SMC Drum Mixer #2, and the 36" SMC Machine, approved in 2016 for construction in the Technical Development Center, for SMC production. The maximum throughput is 5,385 pounds per hour, with PM emissions from the mixer and glass chopper controlled by Tech Center baghouse B4, exhausting to stack S4.**

**Under 40 CFR 63, Subpart WWWW, this is considered a sheet molding compound manufacturing operation.**

- (h) One (1) independent SMC mixer, typically located in the Technical Development Center, identified as Mixer #26, approved in 2016 for construction, with a maximum throughput of 50 pounds per hour, with no pollution control equipment and exhausting inside the building.**

**Under 40 CFR 63, Subpart WWWW, this is considered a sheet molding compound manufacturing operation.**

...  
A.3 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-7-4(c)][326 IAC 2-7-5(15)]

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

- ~~(g) Cleaning solvent identified as IDI Ship Shape having a vapor pressure equal to or less than 0.7kPa; 5mm Hg; or 0.1 psi measured at 20°C (68°F).~~
- ~~(i) Solvent recycling systems with batch capacity less than or equal to 100 gallons.~~
- (g) Cleaning solvent identified as S-0280 Super Flush having a vapor pressure equal to or less than 0.7kPa;5mmHg; or 0.1 psi measured at 20°C (68°F)**
- (ji) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.**
- (jj) Paved and unpaved roads and parking lots with public access.**
- (lk) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower**
- (ml) Stationary fire pumps.**
- (nm) A laboratory as defined in 326 IAC 2-7-1(21)(G), which includes the following:**
  - ~~1. One (1) 24" sheet molding compound SMC line, identified as Laboratory SMC Line 3, located in the laboratory, with no emission controls.~~

[40 CFR 63, Subpart WWWW]

21. Two (2) small laboratory extruders, with no pollution control equipment and exhausting inside the building.
- (en) ~~Eleven Ten (104)~~ aboveground polyester resin storage tanks, identified as T<sub>1</sub> through T<sub>14</sub>. Tanks T<sub>1</sub> through T<sub>6</sub> have a maximum capacity of 7,200 gallons, ~~tank T<sub>7</sub> has a maximum capacity of 6,000 gallons,~~ and tanks T<sub>8</sub> through T<sub>11</sub> each have a capacity of 5,400 gallons. Each aboveground tank is equipped with one vent and each has the potential to emit less than 1 ton VOC/year. **Tank identified as T<sub>7</sub> was never installed.**
- (po) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.
- (qp) Two (2) saws, identified as SA<sub>1</sub> and SA<sub>2</sub>, for plastic sheet production, each with a maximum capacity of 20 pounds per hour, with no emission controls and no outside exhaust.
- (rq) One (1) stationary emergency generator burning diesel fuel, with a maximum output of 10 KW, manufactured in 2012.
- Under 40 CFR 60, Subpart IIII, this is an affected unit.
- (sr) One (1) compression molding press, identified as #1, approved in 2015 for construction, with a maximum through put of fifty (50) pounds of BMC or SMC per hour, using no control and exhausting to the indoors.
- Under 40 CFR 63, Subpart WWWW, this is an affected unit.
- (ts) One (1) compression molding press, identified as #2, approved in 2015 for construction, with a maximum through put of fifty (50) pounds of BMC or SMC per hour, using no control and exhausting to the indoors.
- Under 40 CFR 63, Subpart WWWW, this is an affected unit.
- (t) **One (1) compression molding press, identified as #3, approved in 2016 for construction, with a maximum through put of fifty (50) pounds of BMC or SMC per hour, using no control and exhausting to the indoors.**
- Under 40 CFR 63, Subpart WWWW, this is an affected unit.**
- (u) **One (1) compression molding press, identified as #4, approved in 2016 for construction, with a maximum through put of fifty (50) pounds of BMC or SMC per hour, using no control and exhausting to the indoors.**
- Under 40 CFR 63, Subpart WWWW, this is an affected unit.**
- (v) **One (1) compression molding press, identified as #5, approved in 2016 for construction, with a maximum through put of fifty (50) pounds of BMC or SMC per hour, using no control and exhausting to the indoors.**
- Under 40 CFR 63, Subpart WWWW, this is an affected unit.**
- (w) **One small SMC extruder, located in the SMC-FG Warehouse, identified as SMC Extruder #3, approved in 2016 for construction, with no pollution control equipment and exhausting inside the building.**

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

~~(g) A laboratory as defined in 326 IAC 2-7-1(21)(G) which includes the following:~~

~~1. One (1) 24" sheet molding compound SMC line, identified as SMC Line 3, located in the laboratory.~~

**(g) One (1) 36" sample sheeting molding compound (SMC) line, identified as SMC Line 3, utilizing a dedicated mixer referred to as SMC Drum Mixer #2, and the 36" SMC Machine, approved in 2016 for construction in the Technical Development Center, for SMC production. The maximum throughput is 5,385 pounds per hour, with PM emissions from the mixer and glass chopper controlled by Tech Center baghouse B4, exhausting to stack S4.**

Under 40 CFR 63, Subpart WWWW, this is considered a sheet molding compound manufacturing operation.

**(h) One (1) independent SMC mixer, typically located in the Technical Development Center, identified as Mixer #26, approved in 2016 for construction, with a maximum throughput of 50 pounds per hour, with no pollution control equipment and exhausting inside the building.**

Under 40 CFR 63, Subpart WWWW, this is considered a sheet molding compound manufacturing operation.

**D.1.1 PSD Minor Limits [326 IAC 2-2]**

In order to render the requirements of 326 IAC 2-2 (PSD) not applicable, the Permittee shall comply with the following:

**(a) The PM, PM10, and PM2.5 emissions from each emission unit identified in the table below shall not exceed its specified limit:**

Emission Unit	PM limit (pounds per hour)	PM10 limit (pounds per hour)	PM2.5 limit (pounds per hour)
SMC Drum Mixer	2.91	2.91	2.91
39" SMC Line Large Mixer	8.40	8.40	8.40
48" SMC Line Large Mixer	9.67	9.67	9.67
<b>36" SMC Line/ SMC Drum Mixer #2</b>	<b>7.96</b>	<b>7.96</b>	<b>7.96</b>
<b>SMC Mixer 26 (5-gal pail)</b>	<b>0.19</b>	<b>0.19</b>	<b>0.19</b>
BMC Mixer #1	2.91	2.91	2.91
BMC Mixer #2	2.91	2.91	2.91
BMC Mixer #3	2.91	2.91	2.91
BMC Mixer #4	2.91	2.91	2.91
BMC Mixer #5	2.91	2.91	2.91
BMC Mixer #6	4.37	4.37	4.37
BMC Mixer #11	2.58	2.58	2.58
BMC Mixer #12	2.58	2.58	2.58
BMC Mixer #13	2.58	2.58	2.58
BMC Mixer #14	2.58	2.58	2.58
BMC Mixer #15	0.551	0.551	0.551
BMC Mixer #17	0.551	0.551	0.551
BMC Mixer #18	0.551	0.551	0.551

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

**D.1.12 Particulate Matter (PM) [326 IAC 6-3-2(e)]**

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...

<b>36" SMC Line/SMC Drum Mixer #2</b>	<b>2.69</b>	<b>7.96</b>
<b>SMC Mixer 26 (5-gal pail)</b>	<b>0.01</b>	<b>0.19</b>
BMC Mixer #1 -#5 (each)	0.6	2.91
<b>BMC Mixer #2</b>	<b>0.6</b>	<b>2.91</b>
<b>BMC Mixer #3</b>	<b>0.6</b>	<b>2.91</b>
<b>BMC Mixer #4</b>	<b>0.6</b>	<b>2.91</b>
<b>BMC Mixer #5</b>	<b>0.6</b>	<b>2.91</b>
Rosite Mixer #L11 - #L4 (each)	0.50	2.58
<b>Rosite Mixer #L12</b>	<b>0.50</b>	<b>2.58</b>
<b>Rosite Mixer #L13</b>	<b>0.50</b>	<b>2.58</b>
<b>Rosite Mixer #L14</b>	<b>0.50</b>	<b>2.58</b>
BMC Mixer #17 -#18 (each)	0.075	0.551
<b>BMC Mixer #18</b>	<b>0.075</b>	<b>0.551</b>

Compliance with these limitations will render

the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable to the source for particulates.

**D.1.2 3 Preventive Maintenance Plan [326 IAC 2-7-5(4312)]**

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...

**Compliance Determination Requirements [326 IAC 2-7-5(1)]**

**D.1.34 Particulate Matter (PM)**

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- (a) In order to comply with Conditions D.1.1 and D.1.2, ~~t~~The SMC baghouse B2 shall be in operation at all times when raw material is being added into or blended product is being removed from the SMC mixers associated with the 39" SMC Line, the 48" SMC Line and the SMC Drum Mixer, as well as the BMC mixers for Rosite production identified as Rosite Mixer #L1 through Rosite Mixer #L4, ~~in order to comply with the PM limits under 326 IAC 6-3-2, in Condition D.1.1.~~
- (b) In order to comply with Conditions D.1.1 and D.1.2, ~~t~~The BMC Baghouse B1 shall be in operation at all times when raw material is being added into or blended product is being removed from the BMC mixers identified as BMC Mixer #1 through BMC Mixer #6, ~~in order to comply with the PM limits under 326 IAC 6-3-2, in Condition D.1.1.~~
- (c) In order to comply with Conditions D.1.1 and D.1.2, ~~t~~The Lab Baghouse B3 shall be in operation at all times when raw material is being added into or blended product is being removed from the BMC laboratory mixers identified as BMC Mixer #17 and BMC Mixer #18 ~~in order to comply with the PM limits under 326 IAC 6-3-2, in Condition D.1.1.~~
- (d) **In order to comply with Conditions D.1.1 and D.1.2, the Tech Center Baghouse B4 shall be in operation at all times when raw material is being added into or blended product is being removed from the SMC Drum Mixer #2 associated with the 36"**

**SMC Line, identified as SMC Line 3.**

- (e) In the event that bag failure is observed in a multi-compartment dust collector, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

**Compliance Monitoring Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)][326 IAC 2-7-5(1)]**

**D.1.4 Monitoring [40 CFR Part 64]**

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- (a) ~~Daily visible emissions notations of the stack exhausts of BMC Baghouse B1 exhausting through Stack S1, SMC Baghouse B2 exhausting through Stack S2, and Lab Baghouse B3 exhausting through Stack S3, shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal. For processes operated continuously, "normal" means those conditions prevailing 80% of the time the process is in operation, not counting startup or shut down time. In the case of discontinuous operations, readings must be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee that has worked at the plant least one month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. If abnormal emissions are observed, the Permittee will take reasonable 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) ~~The Permittee shall record the pressure drop across baghouses B1, B2, and B3 at least once per day when the processes are in operation and exhausting to the atmosphere. If the pressure drop is outside the normal range of 0.5 to 6.0 inches of water, or a range established during the latest stack test, then the Permittee must take reasonable 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.~~
- (c) ~~In the case of broken or failed bag detection in a continuously operated process, the failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. If the baghouse controls emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. Operations may continue only if the event qualifies as an emergency as described in Section B – Emergency Provisions.~~

**D.1.5 Visible Emissions Notations [40 CFR 64]**

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- (a) **Visible emission notations of the stack exhausts of BMC Baghouse B1 exhausting through Stack S1, SMC Baghouse B2 exhausting through Stack S2, and Lab Baghouse B3 exhausting through Stack S3, shall be performed once per day during normal daylight operations. Visible emission notations of the stack exhausts of the Tech Center Baghouse B4 exhausting to Stack S4 are not required due to the slightly lower level of PM emissions from the new SMC Line 3. A trained employee shall record whether emissions are normal or abnormal.**
- (b) **For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.**

- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

#### **D.1.6 Parametric Monitoring [40 CFR 64]**

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The Permittee shall record the pressure drop across the baghouses B1, B2, B3, and B4 at least once per day when the processes are in operation and exhausting to the atmosphere. When for any one reading, the pressure drop across the dust collector is outside the normal range the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. The normal range for this dust collector is a pressure drop range between 0.2 and 6.0 inches of water unless a different upper-bound or lower-bound value for this range is determined during the most recent valid stack test. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

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

#### **D.1.7 Broken or Failed Bag Detection**

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

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

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

##### **D.1.8 Record Keeping Requirements**

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- (a) To document the compliance status with Condition D.1.5 - Visible Emission Notation, the Permittee shall maintain records of visible emission notations of BMC Baghouse B1 exhausting through Stack S1, SMC Baghouse B2 exhausting through Stack S2, and Lab Baghouse B3 exhausting through Stack S3 once per day. The Permittee shall include in its daily record when a visible emission

**notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).**

- (b) To document the compliance status with Condition D.1.6 - Parametric Monitoring, the Permittee shall maintain records once per day of the pressure drop across the baghouses B1, B2, B3, and B4 during normal operation when venting to the atmosphere. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that day).**
- (c) Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to the records required by this condition.**

SECTION E.1 ~~FACILITY OPERATION CONDITIONS-NESHAP~~

...

- (g) One (1) 36" sample sheeting molding compound (SMC) line, identified as SMC Line 3, utilizing a dedicated mixer referred to as SMC Drum Mixer #2, and the 36" SMC Machine, approved in 2016 for construction in the Technical Development Center, for SMC production. The maximum throughput is 5,385 pounds per hour, with PM emissions from the mixer and glass chopper controlled by Tech Center baghouse B4, exhausting to stack S4.**

**Under 40 CFR 63, Subpart WWWW, this is considered a sheet molding compound manufacturing operation.**

- (h) One (1) independent SMC mixer, typically located in the Technical Development Center, identified as Mixer #26, approved in 2016 for construction, with a maximum throughput of 50 pounds per hour, with no pollution control equipment and exhausting inside the building.**

**Under 40 CFR 63, Subpart WWWW, this is considered a sheet molding compound manufacturing operation.**

Insignificant Activities

- ~~(g) One (1) 24" sheet molding compound SMC line, identified as Laboratory SMC Line 3, located in the laboratory.~~

~~[40 CFR Part 63, Subpart WWWW]~~

- (hg) One (1) compression molding press, identified as #1, approved in 2015 for construction, with a maximum through put of fifty (50) pounds of BMC or SMC per hour, using no control and exhausting to the indoors.**

**Under 40 CFR 63, Subpart WWWW, this is an affected unit.**

- (ih) One (1) compression molding press, identified as #2, approved in 2015 for construction, with a maximum through put of fifty (50) pounds of BMC or SMC per hour, using no control and exhausting to the indoors.**

**Under 40 CFR 63, Subpart WWWW, this is an affected unit.**

- (i) One (1) compression molding press, identified as #3, approved in 2015 for construction, with a maximum through put of fifty (50) pounds of BMC or SMC per hour, using no control and exhausting to the indoors.**

**Under 40 CFR 63, Subpart WWWW, this is an affected unit.**

- (j) **One (1) compression molding press, identified as #4, approved in 2015 for construction, with a maximum through put of fifty (50) pounds of BMC or SMC per hour, using no control and exhausting to the indoors.**

**Under 40 CFR 63, Subpart WWWW, this is an affected unit.**

- (k) **One (1) compression molding press, identified as #5, approved in 2015 for construction, with a maximum through put of fifty (50) pounds of BMC or SMC per hour, using no control and exhausting to the indoors.**

**Under 40 CFR 63, Subpart WWWW, this is an affected unit.**

...

## SECTION E.2 EMISSIONS UNIT OPERATION CONDITIONS NSPS

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

- (1) Effective July 11, 2013, Hamilton County has been designated attainment for the annual PM2.5 standard. Therefore, Section A.1 has been revised to reflect that PM2.5 emissions are no longer reviewed under 326 IAC 2-3 (Emission Offset).

IDEM revised Sections E.1 to E.2 for clarity.

### Conclusion and Recommendation

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Source Modification No. 057-36422-00043 and Significant Permit Modification No. 057-36476. 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 Nicholas Eilerman at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-5373 or toll free at 1-800-451-6027 extension 4-5373.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Permit Guide on the Internet at: <http://www.in.gov/idem/5881.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

Appendix A: Emission Calculations  
Emission Summary for Modification

Company Name Industrial Dielectrics, Inc. dba IDI Composites International

Address: 407 South 7th Street, Noblesville, IN 46060

Significant Source Modification No. 057-36422-00042

Significant Permit Modification No. 057-36476-00042

Reviewer: Nicholas Eilerman

<b>Potential to Emit of Modification Before Controls (tons/year)</b>									
<b>Process</b>	<b>PM</b>	<b>PM10</b>	<b>PM2.5</b>	<b>SO2</b>	<b>NOx</b>	<b>CO</b>	<b>VOC</b>	<b>Total HAPs</b>	<b>Worst Single HAP (Styrene)</b>
36" SMC Line/ SMC Drum Mixer #2	145.53	145.53	145.53	--	--	--	21.38	21.38	21.38
SMC Mixer 26 (5-gal pail)	1.35	1.35	1.35	--	--	--	0.22	0.22	0.22
Compression Molding Press #3	--	--	--	--	--	--	0.48	0.45	0.45
Compression Molding Press #4	--	--	--	--	--	--	0.48	0.45	0.45
Compression Molding Press #5	--	--	--	--	--	--	0.48	0.45	0.45
Cleaning Solvent	--	--	--	--	--	--	9.92	--	--
SMC Extruder #3	negl.	negl.	negl.	--	--	--	negl.	negl.	negl.
<b>Total</b>	<b>146.88</b>	<b>146.88</b>	<b>146.88</b>	--	--	--	<b>32.95</b>	<b>22.95</b>	<b>22.95</b>

Note: SMC Extruder will generate trivial emissions since it will not involve any mixing or blending of resins or fillers.

## Appendix A: Emission Calculations

Company Name Industrial Dielectrics, Inc. dba IDI Composites International  
 Address: 407 South 7th Street, Noblesville, IN 46060  
 Significant Source Modification No. 057-36422-00042  
 Significant Permit Modification No. 057-36476-00042  
 Reviewer: Nicholas Eilerman

**PTE After Modification (Uncontrolled)**

Emission Source Description	Potential Emissions (ton/yr)								
	PM	PM <sub>10</sub>	PM <sub>2.5</sub>	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	Single HAP (Styrene)	Combined HAPs
BMC Production	216.57	216.57	216.57	--	9.85	--	--	9.85	9.85
SMC Production	531.49	531.49	531.49	--	74.14	--	--	84.57	84.57
BMC Production (Rosite)	105.65	105.65	105.65	--	4.80	--	--	4.80	4.80
BMC Lab	12.41	12.41	12.41	--	0.56	--	--	0.56	0.56
SMC Lab	3.11	3.11	3.11	--	0.49	--	--	0.49	0.49
Emergency Generator	1.04	1.04	0.97	0.97	1.21	3.19	14.83	--	0.01
Compression Molding Press #1	--	--	--	--	0.48	--	--	0.45	0.45
Compression Molding Press #2	--	--	--	--	0.48	--	--	0.45	0.45
Compression Molding Press #3	--	--	--	--	0.48	--	--	0.45	0.45
Compression Molding Press #4	--	--	--	--	0.48	--	--	0.45	0.45
Compression Molding Press #5	--	--	--	--	0.48	--	--	0.45	0.45
Solvent Usage	--	--	--	--	9.92	--	--	--	--
<b>Totals:</b>	<b>870.28</b>	<b>870.28</b>	<b>870.21</b>	<b>0.97</b>	<b>103.37</b>	<b>3.19</b>	<b>14.83</b>	<b>102.53</b>	<b>102.55</b>

**Sourcewide Limited PTE After Modification**

Emission Source Description	Potential Emissions (ton/yr)								
	PM	PM <sub>10</sub>	PM <sub>2.5</sub>	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	Single HAP (Styrene)	Combined HAPs
BMC Production	82.87	82.87	82.87	--	9.85	--	--	9.85	9.85
SMC Production	101.21	101.21	101.21	--	74.14	--	--	84.57	84.57
BMC Production (Rosite)	45.20	45.20	45.20	--	4.80	--	--	4.80	4.80
BMC Lab	10.59	10.59	10.59	--	0.56	--	--	0.56	0.56
SMC Lab	3.11	3.11	3.11	--	0.49	--	--	0.49	0.49
Emergency Generator	1.04	1.04	1.04	0.97	1.21	3.19	14.83	--	0.01
Compression Molding Press #1	--	--	--	--	0.48	--	--	0.45	0.45
Compression Molding Press #2	--	--	--	--	0.48	--	--	0.45	0.45
Compression Molding Press #3	--	--	--	--	0.48	--	--	0.45	0.45
Compression Molding Press #4	--	--	--	--	0.48	--	--	0.45	0.45
Compression Molding Press #5	--	--	--	--	0.48	--	--	0.45	0.45
Solvent Usage	--	--	--	--	9.92	--	--	--	--
<b>Totals:</b>	<b>244.02</b>	<b>244.02</b>	<b>244.02</b>	<b>0.97</b>	<b>103.37</b>	<b>3.19</b>	<b>14.83</b>	<b>102.53</b>	<b>102.55</b>

Note: Styrene and other HAP emissions not calculated as part of these emission calculations. Styrene is expected to make up a significant portion of the total VOCs.

Appendix A: Emission Calculations  
Compression Molding Presses

Company Name: Industrial Dielectrics, Inc. dba IDI Composites International  
Address: 407 South 7th Street, Noblesville, IN 46061  
Significant Source Modification No. 057-36422-00042  
Significant Permit Modification No. 057-36476-00042  
Reviewer: Nicholas Eilerman

Emission Unit Description	Maximum Process Throughput (lb/hr)	Material VOC Content (Wt %)	VOC Emission Factor	Potential VOC Emissions (lb/hr)	Potential VOC Emissions (ton/yr)	Material HAP Content (Wt %)	HAP Emission Factor	Potential HAP Emissions (lb/hr)	Potential HAP Emissions (ton/yr)
Compression Molding Press #1	50.0	14.50%	1.50%	0.11	0.48	13.70%	1.50%	0.10	0.45
Compression Molding Press #2	50.0	14.50%	1.50%	0.11	0.48	13.70%	1.50%	0.10	0.45
Compression Molding Press #3	50.0	14.50%	1.50%	0.11	0.48	13.70%	1.50%	0.10	0.45
Compression Molding Press #4	50.0	14.50%	1.50%	0.11	0.48	13.70%	1.50%	0.10	0.45
Compression Molding Press #5	50.0	14.50%	1.50%	0.11	0.48	13.70%	1.50%	0.10	0.45
<b>Totals:</b>				<b>0.54</b>	<b>2.38</b>			<b>0.51</b>	<b>2.25</b>

**Notes:**

Both compression molding presses will be used to mold any SMC and BMC materials produced at the facility to support customer demand.

Maximum Process Throughput values are provided by facility to represent true maximum molding capacity.

Material VOC/HAP Content is based worst-case formulations for each press provided by facility. The proprietary formulations consist of resins, catalysts, additives, and fillers. The weighted average VOC/HAP content is determined based upon the volatile and HAP components of the formulation. MSDSs for each formulation component are used to assist in this determination. VOC/HAP Emission Factor is obtained from ACMA UEF-1-2011a: Estimating Emission Factors for Open Molding and Other Composite Processes. The 1.5% VOC/HAP emission factor is based upon the higher of the two SMC and BMC material VOC emission factors identified in this report.

Styrene is the only HAP identified in the formulations.

**Methodology:**

Potential VOC Emissions (lb/hr) = Maximum Process Throughput (lb/hr) x Material VOC Content (Wt %) x VOC Emission Factor %

Potential VOC Emissions (ton/yr) = Potential VOC Emissions (lb/hr) x (8760 hr/yr) x (1 ton/2000 lb)

Potential HAP Emissions (lb/hr) = Maximum Process Throughput (lb/hr) x Material HAP Content (Wt %) x HAP Emission Factor %

Potential HAP Emissions (ton/yr) = Potential HAP Emissions (lb/hr) x (8760 hr/yr) x (1 ton/2000 lb)

**Appendix A: Emission Calculations**  
**VOC Emissions**  
**From Cold Cleaning Degreaser**

Company Name Industrial Dielectrics, Inc. dba IDI Composites International

Address: 407 South 7th Street, Noblesville, IN 46060

Significant Source Modification No. 057-36422-00042

Significant Permit Modification No. 057-36476-00042

Reviewer: Nicholas Eilerman

Material	Density (lbs/gal)	Weight % VOC	Maximum Annual Usage (gal/yr)	PTE VOC (tons/yr)
VOC Degreaser	8.90	100.0%	2230.49	9.92
<b>Total</b>				<b>9.92</b>

**Methodology**

PTE VOC (tons/yr) = Density (lbs/gal) x Weight % VOC x Gallons of Solvent (gal/yr) x 1/2,000 (ton/lbs)

Appendix A: Emission Calculations  
Potential to Emit 48" SMC Line Large Mixer

Company Name Industrial Dielectrics, Inc. dba IDI Composites International  
Address: 407 South 7th Street, Noblesville, IN 46060  
Significant Source Modification No. 057-36422-00042  
Significant Permit Modification No. 057-36476-00042  
Reviewer: Nicholas Eilerman

**Estimating Emission Factors from Open Molding and Other Composite Processes (SMC)**

$$E = 0.1457 A_t - 0.1454 \text{ (Equation 1),}$$

where:

E = VOC emission rate, lb/hr, when paste is on the line  
 $A_t$  = Total wet area of SMC machine =  $A_{dl} + A_{du} + W*(L_l + L_u)$   
 $A_{dl}$  = open area of the lower doctor box, ft<sup>2</sup>  
 $A_{du}$  = open area of the upper doctor box, ft<sup>2</sup>  
W = wet width of SMC, ft<sup>2</sup>  
 $L_l$  = Lower wet length, ft  
 $L_u$  = Upper wet length, ft

Note: Equation 1 obtained from ACMA UEF-1-2010 document, pgs. 11-12

**Primary Production SMC Machine (Existing 48" SMC machine)**

$A_{dl}$  = open area of the lower doctor box, ft<sup>2</sup>  
width 0.83 feet  
length 3.50 feet  
 $A_{dl} =$   square feet

$A_{du}$  = open area of the upper doctor box, ft<sup>2</sup>  
width 0.83 feet  
length 3.50 feet  
 $A_{du} =$   square feet

W = wet width of SMC, ft<sup>2</sup>  
W =

$L_l$  = Lower wet length, ft  
 $L_l =$

$L_u$  = Upper wet length, ft  
 $L_u =$

$A_t$  = Total wet area of SMC machine =  $A_{dl} + A_{du} + W*(L_l + L_u)$   
 $A_t =$

E = VOC emission rate, lb/hr, when paste is on the line

$$E = 0.1457 A_t - 0.1454 \text{ (Equation 1),}$$

lb/hr

ton/yr

Note: This equation represents VOC/HAP emissions from SMC Line (which includes SMC Machine, Large Mixer, Small Pigment Dissolver/Mixer, and Small Thickener Dissolver/Mixer), which are based upon the machine specifications for total wet area and open areas of the doctor boxes for the SMC material being processed.

Company Name Industrial Dielectrics, Inc. dba IDI Composites International  
Address: 407 South 7th Street, Noblesville, IN 46060  
Significant Source Modification No. 057-36422-00042  
Significant Permit Modification No. 057-36476-00042  
Reviewer: Nicholas Eilerman

### Estimating Emission Factors from Open Molding and Other Composite Processes (SMC)

$$E = 0.1457 A_t - 0.1454 \text{ (Equation 1),}$$

where:

E = VOC emission rate, lb/hr, when paste is on the line  
 $A_t$  = Total wet area of SMC machine =  $A_{dl} + A_{du} + W*(L_l + L_u)$   
 $A_{dl}$  = open area of the lower doctor box, ft<sup>2</sup>  
 $A_{du}$  = open area of the upper doctor box, ft<sup>2</sup>  
W = wet width of SMC, ft<sup>2</sup>  
 $L_l$  = Lower wet length, ft  
 $L_u$  = Upper wet length, ft

Note: Equation 1 obtained from ACMA UEF-1-2010 document, pgs. 11-12

### Secondary Production SMC Machine (Existing 39" SMC machine relocated from Lab)

$A_{dl}$  = open area of the lower doctor box, ft<sup>2</sup>  
width 0.91 feet  
length 2.83 feet  
 $A_{dl} =$   square feet

$A_{du}$  = open area of the upper doctor box, ft<sup>2</sup>  
width 0.91 feet  
length 2.83 feet  
 $A_{du} =$   square feet

W = wet width of SMC, ft<sup>2</sup>  
W =

$L_l$  = Lower wet length, ft  
 $L_l =$

$L_u$  = Upper wet length, ft  
 $L_u =$

$A_t$  = Total wet area of SMC machine =  $A_{dl} + A_{du} + W*(L_l + L_u)$   
 $A_t =$

E = VOC emission rate, lb/hr, when paste is on the line

$$E = 0.1457 A_t - 0.1454 \text{ (Equation 1),}$$

lb/hr

ton/yr

Note: This equation represents VOC/HAP emissions from SMC Line (which includes SMC Machine, Large Mixer, Small Pigment Dissolver/Mixer, and Small Thickener Dissolver/Mixer), which are based upon the machine specifications for total wet area and open areas of the doctor boxes for the SMC material being processed.

Company Name Industrial Dielectrics, Inc. dba IDI Composites International

Address: 407 South 7th Street, Noblesville, IN 46060

Significant Source Modification No. 057-36422-00042

Significant Permit Modification No. 057-36476-00042

Reviewer: Nicholas Eilerman

**Estimating Emission Factors from Open Molding and Other Composite Processes (SMC)**

$E = 0.1457 A_t - 0.1454$  (Equation 1),

where: 0

E = VOC emission rate, lb/hr, when paste is on the line 0

$A_t$  = Total wet area of SMC machine =  $A_{dl} + A_{du} + W*(L_l + L_u)$  0

$A_{dl}$  = open area of the lower doctor box, ft<sup>2</sup>

$A_{du}$  = open area of the upper doctor box, ft<sup>2</sup>

W = wet width of SMC, ft

$L_l$  = Lower wet length, ft

$L_u$  = Upper wet length, ft

**Mixer #7**

$A_{dl}$ = open area of the lower doctor box, ft <sup>2</sup>		<u>Inches</u>
width	3.00 feet	36
length	1.00 feet	12
$A_{dl}$ =	<input type="text" value="3.00"/> square feet	

$A_{du}$ = open area of the upper doctor box, ft <sup>2</sup>		
width	3.00 feet	36
length	1.00 feet	12
$A_{du}$ =	<input type="text" value="3.00"/> square feet	

W = wet width of SMC, ft		
W =	<input type="text" value="3.00"/>	36

$L_l$ = Lower wet length, ft		
$L_l$ =	<input type="text" value="6.67"/>	80

$L_u$ = Upper wet length, ft		
$L_u$ =	<input type="text" value="2.83"/>	34

$A_t$ = Total wet area of SMC machine = $A_{dl} + A_{du} + W*(L_l + L_u)$		
$A_t$ =	<input type="text" value="34.50"/>	

E = VOC emission rate, lb/hr, when paste is on the line

$E = 0.1457 A_t - 0.1454$  (Equation 1),  
 lb/hr

Note: This equation represents VOC/HAF  ton/yr  
 (for all mixers, including those used for other products and  
 its own dedicated mixers), which are based upon the machine specifications for total wet area and open  
 areas of the doctor boxes for the SMC material being processed.

Company Name Industrial Dielectrics, Inc. dba IDI Composites International  
 Address: 407 South 7th Street, Noblesville, IN 46060  
 Significant Source Modification No. 057-36422-00042  
 Significant Permit Modification No. 057-36476-00042  
 Reviewer: Nicholas Eilerman

Sulfur Content (S) of Fuel (% by weight) 0.500

**Reciprocating Internal Combustion Engines - Diesel Fuel  
 Output Rating (<600 HP)**

Emergency Generator Per EPA Memorandum (09/06/1995), potential emissions were calculated based on 500 hours of operation per year since the generators are used solely to provide backup power.

Emission Unit ID	Capacity (KW/hr)	Capacity (HP)	hp-hr/yr	Diesel Industrial Engines Emission Factors (lb/hp-hr)						
				PM	PM-10	PM-2.5	SOx	NOx	VOC	CO
				0.31	0.31	0.31	0.29	4.41	0.36	0.95
Potential Emissions (TPY)										
				PM	PM-10	PM-2.5	SOx	NOx	VOC	CO
Emergency Generator	10.00	13.45	6,724	1.042	1.042	1.042	0.975	14.827	1.210	3.194

Emission Unit ID	Pollutant				
Emergency Back up Generator					
	CO2	CH4	N2O	Summed Potential Emissions in tons/yr	3.90E+00
Emission Factor in lb/hp-hr	1.16E+00	6.35E-05	9.30E-06	CO2e Total in tons/yr	3.91
Potential Emission in tons/yr	3.90E+00	2.13E-04	3.13E-05		

**Methodology**

For HP > 600  
 HP=Kw/hr\*1.344825737  
 Total Potential Emissions

	PM	PM-10	PM-2.5	SOx	NOx	VOC	CO	CO2e
	1.042	1.042	1.042	0.975	14.827	1.210	3.194	3.91

hp-hr/yr = hp \* 500 hr/yr for emergency generators  
 hp-hr/yr = hp \* 8760 hr/yr for regularly operating generators  
 Emission Factors are from AP 42, Chapter 3.3, Table 3.3-1, SCC #2-02-004-01  
 Emission (tons/yr) = (hp-hr/yr) x Emission Factor (lb/hp-hr)/2,000 lb/ton  
 CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (21) + N2O Potential Emission ton/yr x N2O

Company Name: Industrial Dielectrics, Inc. dba IDI Composites International  
 Address: 407 South 7th Street, Noblesville, IN 46060  
 Significant Source Modification No. 057-36422-00042  
 Significant Permit Modification No. 057-36476-00042  
 Reviewer: Nicholas Eilerman

Emission Unit	Old Emission Unit ID #	Maximum Throughput (lb/hr)	Weight % VOC	Weight % Fillers	VOC/HAP Emission Factor	Potential VOC (lb/hr)	New Potential VOC Emissions (ton/yr)	PM Emission Factor	New Potential PM Emissions (ton/yr)	Baghouse Control Efficiency	Controlled PM Emissions (ton/yr)	Limited PM Emissions (ton/yr)
<b>SMC Production</b>												
SMC Drum Mixer	M3	1200.0	39.27%	61.70%	0.25%	1.18	5.16	1.00%	32.43	98.00%	0.65	12.75
39" SMC Line Large Mixer	M28	5832.0	39.27%	61.70%	0.25%	5.73	24.94	1.00%	157.61	98.00%	3.15	36.79
48" SMC Line Large Mixer	M4	7200.0	39.27%	61.70%	0.25%	7.07	22.44	1.00%	194.58	98.00%	3.89	42.35
New 36" SMC Line/ SMC Drum Mixer #2	-	5385.0	39.27%	61.70%	0.25%	5.29	21.38	1.00%	145.53	98.00%	2.91	7.96
New SMC Mixer 26 (5-gal pail)	-	50.0	39.27%	61.70%	0.25%	0.05	0.22	1.00%	1.35	0.00%	1.35	1.35
						<b>Subtotals:</b>	<b>19.31</b>		<b>74.14</b>		<b>531.49</b>	
<b>BMC Production</b>												
Mixer #1	M11	1200.0	10.97%	60.30%	0.25%	0.33	1.44	1.00%	31.69	98.00%	0.63	12.75
Mixer #2	M10	1200.0	10.97%	60.30%	0.25%	0.33	1.44	1.00%	31.69	98.00%	0.63	12.75
Mixer #3	M9	1200.0	10.97%	60.30%	0.25%	0.33	1.44	1.00%	31.69	98.00%	0.63	12.75
Mixer #4	M6	1200.0	10.97%	60.30%	0.25%	0.33	1.44	1.00%	31.69	98.00%	0.63	12.75
Mixer #5	M5	1200.0	10.97%	60.30%	0.25%	0.33	1.44	1.00%	31.69	98.00%	0.63	12.75
Mixer #6	M27	2200.0	10.97%	60.30%	0.25%	0.60	2.64	1.00%	58.11	98.00%	1.16	19.14
						<b>Subtotals:</b>	<b>2.25</b>		<b>9.85</b>		<b>216.57</b>	<b>4.33</b>
<b>BMC Production (Rosite)</b>												
Mixer #11	L1	1000.0	10.97%	60.30%	0.25%	0.27	1.20	1.00%	26.41	98.00%	0.53	11.30
Mixer #12	L2	1000.0	10.97%	60.30%	0.25%	0.27	1.20	1.00%	26.41	98.00%	0.53	11.30
Mixer #13	L3	1000.0	10.97%	60.30%	0.25%	0.27	1.20	1.00%	26.41	98.00%	0.53	11.30
Mixer #14	L4	1000.0	10.97%	60.30%	0.25%	0.27	1.20	1.00%	26.41	98.00%	0.53	11.30
						<b>Subtotals:</b>	<b>1.10</b>		<b>4.80</b>		<b>105.65</b>	<b>2.11</b>
<b>Insignificant Activities</b>												
<b>BMC Lab</b>												
Mixer #15	M21	100.0	10.97%	60.30%	0.25%	0.03	0.12	1.00%	2.64	98.00%	0.05	2.41
Mixer #16	M22	10.0	10.97%	60.30%	0.25%	0.00	0.01	1.00%	0.26	0.00%	0.26	0.26
Mixer #17	M14	150.0	10.97%	60.30%	0.25%	0.04	0.18	1.00%	3.96	98.00%	0.08	3.17
Mixer #18	M15	150.0	10.97%	60.30%	0.25%	0.04	0.18	1.00%	3.96	98.00%	0.08	3.17
Mixer #19	M23	20.0	10.97%	60.30%	0.25%	0.01	0.02	1.00%	0.53	0.00%	0.53	0.53
Mixer #20	M24	20.0	10.97%	60.30%	0.25%	0.01	0.02	1.00%	0.53	0.00%	0.53	0.53
Mixer #21	M25	20.0	10.97%	60.30%	0.25%	0.01	0.02	1.00%	0.53	0.00%	0.53	0.53
						<b>Subtotals:</b>	<b>0.13</b>		<b>0.56</b>		<b>12.41</b>	<b>2.06</b>
<b>SMC Lab</b>												
Mixer #23	M29	50.0	39.27%	61.70%	0.25%	0.05	0.22	1.00%	1.35	0.00%	1.35	1.35
Mixer #24	M30	50.0	39.27%	61.70%	0.25%	0.05	0.22	1.00%	1.35	0.00%	1.35	1.35
Mixer #25	M31	15.0	39.27%	61.70%	0.25%	0.01	0.06	1.00%	0.41	0.00%	0.41	0.41
						<b>Subtotals:</b>	<b>0.11</b>		<b>0.49</b>		<b>3.11</b>	<b>3.11</b>
<b>Total Emissions</b>							<b>89.85</b>		<b>869.23</b>		<b>23.57</b>	<b>242.98</b>

\* Throughput is a conservative estimate for the laboratory mixer.

**Notes:**

Weight % VOC based upon worst-case formulations for each mixer type provided by facility.  
 Weight % Fillers based upon worst-case formulations for each mixer type provided by facility.  
 VOC/HAP Emission Factor obtained from Table 5-2 of *Average HAP Emission Estimation Equations by Process*, pg. 5-10  
 PM Emission Factor obtained from AP-42, Chapter 6.4, Table 6.4-1  
 VOC emissions from SMC mixers are not based upon individual mixers but rather on approved open SMC paste area calculations for the SMC machine (refer to separate emission calculation spreadsheets for the 39" and 48" SMC Lines).  
 Baghouse ID # provided by facility (note that some mixers will now need to be controlled to meet the state PM emission limits based upon increased process capacities).  
 Baghouse Control Efficiency based upon updated information provided by facility for all baghouses.  
 Compliance with PM emission limits for mixers is based upon the Process Weight Rate Rule in 326 IAC 6-3 (TRUE = baghouse required to comply, FALSE = baghouse not required to comply).  
 Existing flatsheet closed molding presses (2) not included in the emissions audit since they are not included in the existing permit and since they will be removed from the facility.  
 Other minor existing emission units (BMC scale, saws, sander, ovens, grinder, Vazo blender, Resin blending mixer for Rosite, and Dispersion mixer) are not included in these emission calculations since they will be removed from the facility and/or they were not included in existing permit. These emission units will not have an impact on the type of permit modification required, but will still be addressed for clarity in the permit modification request to be submitted to IDEM.

**Methodology:**

Potential VOC Emissions (lb/hr) = Throughput (lb/hr) x Weight % VOC x VOC/HAP Emission Factor %  
 Potential VOC Emissions (ton/yr) = Potential VOC Emissions (lb/hr) x (8760 hr/yr) x (1 ton/2000 lb)  
 Potential PM Emissions (ton/yr) = Throughput (lb/hr) x Weight % Fillers x PM Emission Factor % x (8760 hr/yr) x (1 ton/2000 lb)  
 Actual PM Emissions (ton/yr) = Potential PM Emissions (ton/yr) x (1-Baghouse Control Efficiency %)



# 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](http://www.idem.IN.gov)

**Michael R. Pence**  
Governor

**Carol S. Comer**  
Commissioner

January 25, 2016

Rich Snyder  
Industrial Dielectrics, Inc. dba IDI Composites In  
407 S 7th Street  
Noblesville, IN 46061

Re: Public Notice  
IDI Composites Inc.  
Permit Level: Title V SSM & SPM  
Permit Number: 057-36476-00042 & 057-36422-00042

Dear Mr. Snyder:

Enclosed is a copy of your draft Title V, 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 Times in Noblesville, Indiana publish the abbreviated version of the public notice no later than «ConfirmedPublicationDate». 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 Hamilton East Public Library, 5 Municipal Drive in Fishers, 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 Nicholas Eilerman 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 4-5373 or dial (317) 234-5373.

Sincerely,  
**Catherine Denny**  
Permits Branch  
Office of Air Quality

Enclosures  
PN Applicant Cover letter 8/27/2015



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Governor

**Carol S. Comer**  
Commissioner

## ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING

January 25, 2016

*The Times*  
641 Westfield Road  
Noblesville, IN 46060

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for Industrial Dielectrics, Inc. dba IDI Composites In , Hamilton 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 Monday, January 25, 2016.

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 Catherine Denny at 800-451-6027 and ask for extension 4-5256 or dial 317-234-5256.

Sincerely,  
***Catherine Denny***  
Permit Branch  
Office of Air Quality

Permit Level: Title V  
Permit Number: 057-36476-00042 & 057-36422-00042

Enclosure

PN Newspaper.dot 8/27/2015



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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**Michael R. Pence**  
*Governor*

**Carol S. Comer**  
*Commissioner*

January 25, 2016

To: **Hamilton East Public Library - Fishers Branch**

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: Industrial Dielectrics, Inc. dba IDI Composites In**  
**Permit Number: 057-36476-00042 & 057-36422-00042**

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 8/27/2015



## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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**Michael R. Pence**  
Governor

**Carol S. Comer**  
Commissioner

### Notice of Public Comment

**January 25, 2016**

**Industrial Dielectrics, Inc. dba IDI Composites Inc**  
**057 - 36422 - 00042 & 057-36467-00042**

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](mailto: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 8/27/2015

# Mail Code 61-53

IDEM Staff	CDENNY 1/25/2016 Industrial Dielectrics. dba IDI Composites 057-36476-00042 & 057-36422-00042 (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:  <b>CERTIFICATE OF MAILING ONLY</b>	

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		Rich Snyder Industrial Dielectrics, Inc. dba IDI Composites In 407 S 7th Street Noblesville IN 46061 (Source CAATS)									
2		Jay Merrell President Industrial Dielectrics, Inc. dba IDI Composites In PO Box 357 Noblesville IN 46061 (RO CAATS)									
3		Environmental Field Services, Inc. 40 SR 32 W Westfield IN 46074 (Affected Party)									
4		Soil Stabilization, Inc. 15530 Stoney Creek Way Noblesville IN 46060 (Affected Party)									
5		Noblesville City Council and Mayors Office 16 S. 10th St. Noblesville IN 46060 (Local Official)									
6		Hamilton County Health Department 18030 Foundation Dr. #A Noblesville IN 46060-5405 (Health Department)									
7		Hamilton County Board of Commissioners One Hamilton County Square, Suite 157 Noblesville IN 46064 (Local Official)									
8		Mr. Joseph VanCamp Cornerstone Environmental 312 E Diamond St. Kendallville IN 46755 (Consultant)									
9		Hamilton East Public Library - Fishers Branch 5 Municipal Drive Fishers In 46038 (Library)									
10											
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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 <b>Domestic Mail Manual R900, S913, and S921</b> for limitations of coverage on inured and COD mail. See <b>International Mail Manual</b> for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
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