Indiana Department of Environmental Management
We Protect Hoosiers and Our Environment.
100 N. Senate Avenue • Indianapolis, IN 46204
(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Michael R. Pence
Governor

Carol S. Comer
Commissioner

NOTICE OF 30-DAY PERIOD
FOR PUBLIC COMMENT

Preliminary Findings Regarding a
Significant Modification to a
Part 70 Operating Permit Renewal
for J. P., Inc. d/b/a Jasper Plastics Solutions in Kosciusko County

Significant Source Modification No.: 085-36655-00013
Significant Permit Modification No.: 085-36657-00013

The Indiana Department of Environmental Management (IDEM) has received an application from J. P., Inc. d/b/a Jasper Plastics Solutions, located at 501 West Railroad Ave., Syracuse, Indiana 46567, for a significant modification of its Part 70 Operating Permit Renewal No. T085-32217-00013, issued on February 1, 2013. If approved by IDEM's Office of Air Quality (OAQ), this proposed modification would allow J. P., Inc. d/b/a Jasper Plastics Solutions to make certain changes at its existing source. J. P., Inc. d/b/a Jasper Plastics Solutions has applied to add new emission units at the source.
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:

Syracuse Public Library
115 E. Main Street
Syracuse, IN 46567

and

IDEM Northern Regional Office
300 N. Michigan Street, Suite 450
South Bend, IN 46601-1295

A copy of the preliminary findings is available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/.
How can you participate in this process?

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

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

Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so that you can be added to IDEM's mailing list to receive notice of future action related to this permit. If you do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit number SSM No.: 085-36655-00013 and SPM No.: 085-36657-00013 in all correspondence.

Comments should be sent to:

Katrina Gilbank
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for extension 4-9526
Or dial directly: (317) 234-9526
Fax: (317) 232-6749 attn: Katrina Gilbank
E-mail: KGilbank@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, at the IDEM Regional Office indicated above, and the IDEM public file room on the 12th floor of the Indiana Government Center North, 100 N. Senate Avenue, Indianapolis, Indiana 46204-2251.

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

Jason R. Krawczyk, Section Chief
Permits Branch
Office of Air Quality

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DRAFT

Sam Korenstra
J. P., Inc. d/b/a Jasper Plastics Solutions
501 W. Railroad Ave.
Syracuse, IN 46567

Re: 085-36657-00013
Significant Permit Modification to
Part 70 Renewal No.: T085-32217-00013

Dear Sam Korenstra:

J. P., Inc. d/b/a Jasper Plastics Solutions was issued Part 70 Operating Permit Renewal No.:T085-32217-00013 on February 1, 2013, for a stationary faux wood, plastic furniture & miscellaneous plastic parts manufacturing & coating plant located at 501 West Railroad Ave., Syracuse, Indiana. An application to modify the source was received on December 28, 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 Part 63, Subpart WWWW - National Emission Standards for Hazardous Air Pollutants (NESHAP) for Reinforced Plastic Composites Production

Attachment B: 40 CFR Part 63, Subpart PPPP - National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Plastic Parts and Products

Attachment C: 40 CFR Part 63, Subpart JJ - National Emission Standards for Hazardous Air Pollutants (NESHAP) for Wood Furniture Manufacturing Operations

Attachment D: 40 CFR Part 63, Subpart ZZZZ - National Emission Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines

Attachment E: 40 CFR Part 63, Subpart DDDDD - National Emission Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers and Process Heaters

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

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

A copy of the permit is available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/. For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Permit Guide on the Internet at: http://www.in.gov/idem/5881.htm; and the Citizens' Guide to IDEM on the Internet at: http://www.in.gov/idem/6900.htm.

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

If you have any questions on this matter, please contact Angela Taylor of my staff, OAQ, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana, 46204-2251, or call at (800) 451-6027, and ask for Angela Taylor or extension 4-5329 or dial (317) 234-5329.

Sincerely,

Jason R. Krawczyk, Section Chief
Permits Branch
Office of Air Quality

Attachments: Significant Source Modification, Calculations, and Technical Support Document

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

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DRAFT

Part 70 Operating Permit Renewal
OFFICE OF AIR QUALITY

J. P., Inc. d/b/a Jasper Plastics Solutions
501 West Railroad Ave.
Syracuse, Indiana 46567

(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.: T085-32217-00013	
Issued by: Original Signed Chrystal A. Wagner, Section Chief Permits Branch, Office of Air Quality	Issuance Date: February 1, 2013 Expiration Date: February 1, 2018

Significant Permit Modification No. 085-33674-00013, issued on January 28, 2014;
Significant Permit Modification No.: 085-35096-00013, issued on March 12, 2015; and
Significant Permit Modification No. 085-35814-00013, issued on July 29, 2015

Significant Permit Modification No.: 085-36657-00013	
Issued by: Jason R. Krawczyk, Section Chief Permits Branch Office of Air Quality	Issuance Date: Expiration Date: February 1, 2018

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SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary manufacturing and surface coating of faux wood, plastic furniture, reinforced plastic products and miscellaneous plastic parts operation.

Source Address:	501 West Railroad Ave., Syracuse, Indiana 46567
General Source Phone Number:	(574) 903-1339
SIC Code:	3089 (Plastics Products, Not Elsewhere Classified)
County Location:	Kosciusko
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Operating Permit Program Minor Source, under PSD Rules Major Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

(a) Eighteen (18) spray booths, identified as SB1 through SB18, constructed in 2008, using HVLP guns to coat molded plastic or wood parts, with a total maximum capacity of 145 parts per hour, using water pan wet collectors for particulate control, and exhausting to stacks identified as SBS1 through SBS18. These spray booths use three different coatings, each of which is mutually exclusive.

Under 40 CFR Part 63, Subpart PPPP these units are considered affected facilities.

Under 40 CFR Part 63, Subpart JJ spray booths these units are considered affected facilities.

(b) One (1) spray booth, identified as SB30, constructed in 2011, using HVLP guns to coat molded plastic or wood parts, with a maximum capacity of 12.5 parts per hour, using dry filters for particulate control, and exhausting to stack identified as SBS30.

Under 40 CFR Part 63, Subpart PPPP this unit is considered an affected facility.

(c) One (1) reciprocator, performing FIT gel coat application and resin flow coating lamination, identified as RGR1, approved in 2015 for construction, with a maximum production rate of 1.00 part per hour, equipped with a dry filter bank for particulate control, and exhausting to stack RGR1-S.

Under 40 CFR 63, Subpart WWWW, this emission unit is considered a new unit at a new affected source;

(d) Two (2) reciprocators, performing FIT gel coat application and resin flow coating lamination, identified as RGR2 and RGR3, approved in 2015 for construction, each with a maximum production rate of 1.00 part per hour, each equipped with a dry filter bank for particulate control, and exhausting to stacks RGR1-S and RGR1-S, respectively.

Under 40 CFR 63, Subpart WWWW, these emission units are considered new units at a new affected source;

(e) Two (2) portable FIT gel coat application guns, identified as PGG1 and PGG2, approved in 2015 for construction, each with a maximum production rate of 3.00 parts per hour, equipped with a dry filter bank for particulate control, and exhausting to stack RGR1-S.

Under 40 CFR 63, Subpart WWWW, these emission units are considered new units at a new affected source;

(f) One (1) non-atomizing portable chop gun, identified as PCG1, approved in 2015 for construction, with a maximum production rate of 3.00 parts per hour, equipped with dry filter banks for the control of particulate matter emissions, and exhausting through stack RGR1-S.

Under 40 CFR 63, Subpart WWWW, this emission unit is considered a new unit at a new affected source;

(g) One (1) resin transfer molding operation, identified as RTM1, approved in 2015 for construction, with a maximum production rate of 2.50 parts per hour, no control and exhausting inside the building.

Under 40 CFR 63, Subpart WWWW, this emission unit is considered a new unit at a new affected source;

(h) One (1) fluid impingement technology (FIT) gel coat application booth, identified as RTMGC, approved in 2015 for construction, with a maximum production rate of 2.50 parts per hour, equipped with a dry filter bank for the control of particulate matter emissions, and exhausting through stack RTMGC-S.

Under 40 CFR 63, Subpart WWWW, this emission unit is considered a new unit at a new affected source; and

(i) One (1) mold preparation operation, identified as RTMMP, approved in 2015 for construction, with a maximum production rate of 2.50 parts per hour no control and exhausting inside the building.

Under 40 CFR 63, Subpart WWWW, this emission unit is considered a new unit at a new affected source.

(j) One portable chop gun (open molding), identified as PCG2, using one (1) non-atomized fluid impingement applicator, approved in 2015 for construction, with a maximum capacity of 3 parts per hour, using dry filters as control, and exhausting to stack RGR1-S.

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

(k) One portable chop gun (open molding), identified as PGG3, using one (1) non-atomized fluid impingement applicator, approved in 2015 for construction, with a maximum capacity of 3 parts per hour, using dry filters as control, and exhausting to stack RGR1-S.

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

(l) One plastic part flow coating operation (adhesive application), identified as AO, approved in 2015 for construction, with a maximum capacity of 3 plastic parts per hour, no control and exhausting to inside.

Under 40 CFR 63, Subpart PPPP, this is considered an affected facility.

(m) One (1) coating touch-up booth, identified as TB1, approved in 2016 for construction, with a maximum capacity of 31 parts per hour, using 6 HVLP spray guns, using dry filters for particulate control, and exhausting to stack TB1S.

Under 40 CFR 63, Subpart PPPP, this is considered an affected facility.

(n) One (1) flat panel coating line, identified as FL1, consisting of three (3) robotic spray reciprocators (BCM1, GCM1, and TCM1) and three (3) drying ovens (BCDO, GCDO, and TCDO), approved in 2016 for construction, with a maximum capacity of 310 parts per hour (flat garage door panels), using dry filters for particulate control, and exhausting to stacks BCM1S, GCM1S, TCM1S, BCDOS, GCDOS, and TCDOS.

Under 40 CFR 63, Subpart PPPP, this is considered an affected facility.

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

This stationary source also includes the following insignificant activities:

(a) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations, including the following:

(1) One (1) department for Urethane Machining, identified as UM, constructed in 2008, with a capacity of 1451.73 pounds of molded urethane per hour, and with particulate emissions controlled by three (3) Grizzly G0638 baghouses, identified as DC1, DC2, and DC3, controlling Urethane Machining Operations, and venting inside the building.

(2) One (1) department for Woodworking Operations, identified as WW, constructed in 2008, with a capacity of 500 pounds of wood per hour, and with particulate emissions controlled by two (2) ACT 2-8 baghouses, identified as DC4 and DC5, controlling Woodworking Operations, and venting inside the building.

(3) Ten (10) hand grinders, constructed in 2008, identified as HGR1 through HGR10, with a total maximum production rate of 136.78 pounds per hour, controlled by dry filters.

(b) Activities or categories of activities with individual HAP emissions not previously identified as any unit emitting greater than one (1) pound per day, but less than five (5) pounds per day or one (1) ton per year of a single HAP.

(1) Plastics molding and crosslinking with emission less than 0.5 tons per year and consisting of:

(A) Four (4) mixing tanks identified as MT1 through MT4, with a maximum capacity of 375 lb/hr, each.

(B) Six (6) polyurethane pouring machines identified as P1 through P6, with maximum capacity of 250 lb/hr, each.

(C) One (1) R&D polyurethane pouring machine, identified as P7, approved for construction in 2013, with a maximum capacity of 80 lb/hr, using no control, and exhausting indoors.

(D) Molding operations identified as MO1, with a total maximum capacity of 1,450 lb/hr, and exhausting to stacks identified as SBS1 through SBS29.

Molding prep work occurs in spray booths SB1 through SB18. Upon completion the molds move to department UM, and then return to spray booths SB1 through SB18 for completion.

(2) Three (3) bulk storage tanks, identified as PT1, PT2, and PT3, with a capacity of 5,000 gallons, each, used for storing plastics, and venting through PTV 1, PTV2, and PTV3.

(3) Two (2) storage tanks, identified as IT1 and IT2, with a capacity of 5,000 gallons, each, used for storing plastics, and venting through ITV1 and ITV2.

(4) One (1) bulk resin tank, approved in 2015 for construction, identified as BT1, with a maximum capacity of 5,000 gallons, and exhausting to stack BTV1.

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

(5) One (1) natural gas-fired emergency generator, constructed in 2000, with a maximum heat input capacity of 0.05 million Btu per hour. Under 40 CFR Part 63, Subpart ZZZZ, this is considered an affected facility.

(c) One (1) polyster tank, approved in 2015 for construction, identified as BT2, with a maximum capacity of 5,000 gallons, and exhausting to stack BT2V.

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

(d) Nine (9) natural gas-fired space heaters, with no control, approved in 2015 for construction and described as follows:

ID	heat input (MMBtu/hr)	stack
OH1	0.25	OH1S
AM1-AM8	0.75 (each)	exhausting inside

(e) Four (4) natural gas-fired surface coating drying ovens, with no control, approved in 2015 for construction and described as follows:

ID	heat input (MMBtu/hr)	stack
DO1	0.76	DO1S
DO2	0.76	DO2S
DO3	0.97	DO3S
DO4	0.76	DO4S

(f) One (1) water jet cutter, identified as WJ1, approved in 2015 for construction, with a maximum capacity of 1391 pounds per hour, equipped with enclosure with dry filters for particulate control and exhausting inside.

(g) One (1) flat panel brush cleaner, Identified as FLPB1, approved in 2016 for construction, used to remove debris from flat panels before coating, using one (1) 1400 acfm baghouse (DC6) with an outlet grain loading of 0.001 gr/acfm for particulate control, and exhausting inside of the building.

(h) One (1) natural gas-fired, direct-fired, flat line air makeup unit for space heating, identified as FLAM1, approved for construction in 2016, with a maximum heat input capacity of 2.7 MMBtu/hour.

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

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

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

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

SECTION B GENERAL CONDITIONS

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

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

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

(a) This permit, T085-32217-00013, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. 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, or Northern Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance and Enforcement Branch), or
Telephone Number: 317-233-0178 (ask for Office of Air Quality, Compliance and Enforcement Branch)
Facsimile Number: 317-233-6865
Northern Regional Office phone: (574) 245-4870; fax: (574) 245-4877.

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

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

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

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

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

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

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

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(8) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

(g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

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

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

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

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

(c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

(d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:

(1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

(2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and

(4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

(e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

(f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]

(g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

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

(a) All terms and conditions of permits established prior to T085-32217-00013 and issued pursuant to permitting programs approved into the state implementation plan have been either:

(1) incorporated as originally stated,

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

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

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

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

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

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

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

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

(1) That this permit contains a material mistake.

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

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

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

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

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

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

Request for renewal shall be submitted to:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

(4) The Permittee notifies the:

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

and

United States Environmental Protection Agency, Region 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) or (c)(1). The Permittee shall make such records available, upon reasonable request, for public review.

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

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

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

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

(3) Any change in emissions; and

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

C.2 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

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

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

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

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

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

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work

or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

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

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Demolition and Renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

(g) Indiana Licensed Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

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

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

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

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

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

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

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

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

(b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

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

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

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

(a) The Permittee shall maintain the most recently submitted written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

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

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

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

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

(a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.

(b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:

(1) initial inspection and evaluation;

(2) recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system); or

(3) any necessary follow-up actions to return operation to normal or usual manner of operation.

(c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:

(1) monitoring results;

(2) review of operation and maintenance procedures and records; and/or

(3) inspection of the control device, associated capture system, and the process.

(d) Failure to take reasonable response steps shall be considered a deviation from the permit.

(e) The Permittee shall record the reasonable response steps taken.

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

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall submit a description of its response actions to IDEM, OAQ, no later than seventy-five (75) days after the date of the test.

(b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

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

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

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

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.17 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.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)][326 IAC 2-1.1-11]

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

(b) The address for report submittal is:
Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

(d) 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.19 Compliance with 40 CFR 82 and 326 IAC 22-1

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

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(a) Eighteen (18) spray booths, identified as SB1 through SB18, constructed in 2008, using HVLP guns to coat molded plastic or wood parts, with a total maximum capacity of 145 parts per hour, using water pan wet collectors for particulate control, and exhausting to stacks identified as SBS1 through SBS18. These spray booths use three different coatings, each of which is mutually exclusive.

Under 40 CFR Part 63, Subpart PPPP these units are considered affected facilities.

Under 40 CFR Part 63, Subpart JJ spray booths these units are considered affected facilities.

(b) One (1) spray booth, identified as SB30, constructed in 2011, using HVLP guns to coat molded plastic or wood parts, with a maximum capacity of 12.5 parts per hour, using dry filters for particulate control, and exhausting to stack identified as SBS30.

Under 40 CFR Part 63, Subpart PPPP this unit is considered an affected facility.

(c) One (1) reciprocator, performing FIT gel coat application and resin flow coating lamination, identified as RGR1, approved in 2015 for construction, with a maximum production rate of 1.00 part per hour, equipped with a dry filter bank for particulate control, and exhausting to stack RGR1-S.

Under 40 CFR 63, Subpart WWWW, this emission unit is considered a new unit at a new affected source;

(d) Two (2) reciprocators, performing FIT gel coat application and resin flow coating lamination, identified as RGR2 and RGR3, approved in 2015 for construction, each with a maximum production rate of 1.00 part per hour, each equipped with a dry filter bank for particulate control, and exhausting to stacks RGR1-S and RGR1-S, respectively.

Under 40 CFR 63, Subpart WWWW, these emission units are considered new units at a new affected source;

(e) Two (2) portable FIT gel coat application guns, identified as PGG1 and PGG2, approved in 2015 for construction, each with a maximum production rate of 3.00 parts per hour, equipped with a dry filter bank for particulate control, and exhausting to stack RGR1-S.

Under 40 CFR 63, Subpart WWWW, these emission units are considered new units at a new affected source;

(f) One (1) non-atomizing portable chop gun, identified as PCG1, approved in 2015 for construction, with a maximum production rate of 3.00 parts per hour, equipped with dry filter banks for the control of particulate matter emissions, and exhausting through stack RGR1-S.

Under 40 CFR 63, Subpart WWWW, this emission unit is considered a new unit at a new affected source;

(g) One (1) resin transfer molding operation, identified as RTM1, approved in 2015 for construction, with a maximum production rate of 2.50 parts per hour, no control and exhausting inside the building.

Under 40 CFR 63, Subpart WWWW, this emission unit is considered a new unit at a new affected source;

(h) One (1) fluid impingement technology (FIT) gel coat application booth, identified as RTMGC,

approved in 2015 for construction, with a maximum production rate of 2.50 parts per hour, equipped with a dry filter bank for the control of particulate matter emissions, and exhausting through stack RTMGC-S.

Under 40 CFR 63, Subpart WWWW, this emission unit is considered a new unit at a new affected source; and

(i) One (1) mold preparation operation, identified as RTMMP, approved in 2015 for construction, with a maximum production rate of 2.50 parts per hour no control and exhausting inside the building.

Under 40 CFR 63, Subpart WWWW, this emission unit is considered a new unit at a new affected source.

(j) One portable chop gun (open molding), identified as PCG2, using one (1) non-atomized fluid impingement applicator, approved in 2015 for construction, with a maximum capacity of 3 parts per hour, using dry filters as control, and exhausting to stack RGR1-S.

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

(k) One portable chop gun (open molding), identified as PGG3, using one (1) non-atomized fluid impingement applicator, approved in 2015 for construction, with a maximum capacity of 3 parts per hour, using dry filters as control, and exhausting to stack RGR1-S.

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

(m) One (1) coating touch-up booth, identified as TB1, approved in 2016 for construction, with a maximum capacity of 31 parts per hour, using 6 HVLP spray guns, using dry filters for particulate control, and exhausting to stack TB1S.

Under 40 CFR 63, Subpart PPPP, this is considered an affected facility.

(n) One (1) flat panel coating line, identified as FL1, consisting of three (3) robotic spray reciprocators (BCM1, GCM1, and TCM1) and three (3) drying ovens (BCDO, GCDO, and TCDO), approved in 2016 for construction, with a maximum capacity of 310 parts per hour (flat garage door panels), using dry filters for particulate control, and exhausting to stacks BCM1S, GCM1S, TCM1S, BCDOS, GCDOS, and TCDOS.

Under 40 CFR 63, Subpart PPPP, this is considered an affected facility.

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

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

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

In order to render 326 IAC 2-2(PSD) not applicable, the total sum of VOC usage (from coatings, mold release agents, resins, gelcoats, catalysts coatings, dilution solvents, and cleaning solvents) at the following:

(a) surface coating booths (SB1- SB18 and SB30);
(b) gel coat application operations (RTMGC, RGR1, RGR2, RGR3, PCG1 and PGG2);
(c) Resin Transfer Molding Unit (RTM1),
(d) Mold Preparation Operation (RTMMP),
(e) portable chop guns (PCG2 and PGG3),
(f) Flat Panel Coating Line (FL1), and
(g) Coating Touchup Booth (TB1)

shall be limited such that the VOC emissions shall not exceed 245.0 tons per twelve (12) consecutive months period with compliance determined at the end of each month.

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

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

The amount of VOC delivered to the Flat Panel Coating Line (FL1) and the Coating Touchup Booth (TB1) shall collectively not exceed twenty-four and nine tenths (24.9) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with this limit shall limit total potential to emit of VOC to less than twenty five (25) tons per twelve (12) consecutive month period from TB1 and FL1 and shall render the requirements of 326 IAC 8-1-6 (New Facilities; General Reduction Requirements) not applicable to TB1 and FL1.

D.1.3 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture and cabinets by spray booths (SB1 through SB18 and SB30), with the exception of no more than ten (10) gallons per day used for touch-up and repair operations, shall utilize one of the following application methods:

Airless Spray Application
Air Assisted Airless Spray Application
Electrostatic Spray Application
Electrostatic Bell or Disc Application
Heated Airless Spray Application
Roller Coating
Brush or Wipe Application
Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

D.1.4 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d):

(a) Particulate from spray booths SB1 through SB18 shall be controlled by water pan wet collectors.

(b) Particulate from spray booth SB30 shall be controlled by dry particulate filters.

(c) Particulate from FIT gel coat application booth RTMGC shall be controlled by dry particulate filters.

(d) Particulate from the surface coating booths identified as FL1 and TB1 shall be controlled by a dry particulate filter, waterwash, or an equivalent control device.

The Permittee shall operate the control devices in accordance with manufacturer's specifications.

D.1.5 Reinforced Plastic Composites Manufacturing [326 IAC 20-56-2]

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

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

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

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

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

(1) Appropriate application techniques.

(2) Appropriate equipment cleaning procedures.

Appropriate equipment setup and adjustment to minimize material usage and overspray.

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

(1) A copy of the current training program.

(2) A list of the following:

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

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

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

D.1.6 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

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

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

D.1.7 Volatile Organic Compounds (VOCs)

Compliance with the VOC usage limitation in Conditions D.1.1 and D.1.2 shall be determined based upon the following criteria:

(a) Pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a), the Permittee shall prepare or obtain from the manufacturer the copies of the “as supplied” and “as applied” VOC data sheets or Material Safety Data Sheets (MSDS) for each coating, mold release agent, resin, gel coat, catalyst, and solvent used in the following:
(1) surface coating booths (SB1- SB18 and SB30);
(2) gel coat application operations (RTMGC, RGR1, RGR2, RGR3, PCG1 and PGG2);
(3) Resin Transfer Molding Unit (RTM1),
(4) Mold Preparation Operation (RTMMP),
(5) portable chop guns (PCG2 and PGG3),
(6) One (1) coating touch-up booth, identified as TB1, and
(7) One (1) flat panel coating line, identified as FL1,

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

(b) Compliance with the VOC emission limitation contained in Condition D.1.1 shall be determined as follows for the following open and closed molding operations:

(1) gel coat application operations (RTMGC, RGR1, RGR2, RGR3, PCG1 and PGG2);
(2) Resin Transfer Molding Unit (RTM1),
(3) Mold Preparation Operation (RTMMP), and
(4) portable chop guns (PCG2 and PGG3)

(A) Monthly VOC emissions of the open and closed molding operations shall be calculated with the following equation:

EVOC = ∑ [Egelcoat + Eresin + Ecat + Esol]
Where:
EVOC = VOC emissions from open and closed molding operations (tons/month)
Egelcoat = VOC emissions from gel coats of open and closed molding operations (tons/month)
Eresin = VOC emissions from resins of the open and closed molding operations (tons/month)
Ecat = VOC emissions from catalysts of the open and closed molding operations (tons/month)
Esol = VOC emissions from all other solvents (tons/month)

(B) VOC emissions from the gel coats of the open and closed molding operations shall be calculated by multiplying the monthly usage of each gel coat by the emission factor provided in the “Unified Emission Factors for Open Molding of Composites,” American Composites Manufacturers Association (ACMA), October 13, 2009 or its updates, using the following equation:

Egelcoat= ∑ [(Ggelcoat * Dgelcoat * EF) / 2000]

Where:
Egelcoat = VOC emissions from gel coats (tons/month)
Ggelcoat = gallons of gel coat used per month (gallons/month)
Dgelcoat = density of gel coat (pounds/gallon)
EF = VOC Emission factor of the gel coat (weight %), or VOC Emission factor (pounds/ton / 2000)
2000 = conversion factor (pounds/ton)

Until such time that new emission factors are available at this source, the emission factors shall be taken from the Unified Emission Factors for Open Molding of Composites.

(C) VOC emissions from the resins of the open and closed molding operations shall be calculated by multiplying the monthly usage of each resin by the emission factor provided in "Chapter 4.4 - Polyester Resin Plastic Products Fabrication - Table 4.4.-2" for closed molding operations and the “Unified Emission Factors for Open Molding of Composites,” American Composites Manufacturers Association (ACMA), October 13, 2009 or its updates for open molding operations, using the following equation:

Eresin= ∑ [(Gresin * Dresin * EF) / 2000]

Where:
Eresin =VOC emissions from resins (tons/month)
Gresin = gallons of resin used per month (gallons/month)
Dresin = density of resin (pounds/gallon)

EF = VOC Emission factor of the resin (weight %), or VOC Emission factor (pounds/ton / 2000)
2000 = conversion factor (pounds/ton)

Until such time that new emission factors are available at this source, the emission factors shall be taken from the Chapter 4.4 - Polyester Resin Plastic Products Fabrication - Table 4.4.-2 and the Unified Emission Factors for Open Molding of Composites.

(D) VOC emissions from the catalysts of the open and closed molding operations shall be calculated by using the following equation:

Ecat = ∑ [(Gcat * Dcat * EFcat) / 2000]

Where:
Ecat = VOC emissions from catalysts (tons/month)
Gcat = gallons of catalysts used per month (gallons/month)
Dcat = density of catalysts (pounds/gallon)
EFcat = VOC emission factor of catalysts (weight %)
2000 = conversion factor (pounds/ton)

(E) VOC emissions from the solvents of the open and closed molding operations shall be calculated by using the following equation:

Esol = ∑ [(Gsol * Dsol * EFsol) / 2000]

Where:
Esol = VOC emissions from solvents (tons/month)
Gsol = gallons of solvent used per month (gallons/month)
Dsol =density of solvent (pounds/gallon)
EFsol = VOC emission factor of solvent (100%, by weight)
2000 = conversion factor (pounds/ton)

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

D.1.8 Monitoring

(a) Daily inspections shall be performed to verify that the water level of the water pans meet the manufacturer's recommended level. To monitor the performance of the water pans, the water level of the pans shall be maintained weekly at a level where surface agitation indicates impact of the air flow. Water shall be kept free of solids and floating material that reduces the capture efficiency of the water pan. In addition, weekly observations shall be made of the overspray from the surface coating booths stacks (SBS1 through SBS18) while one or more of the booths are in operation. If a condition exists which should result in a response, the Permittee shall take a reasonable response.

(b) Daily inspections shall be performed to verify the placement, integrity, and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stack (SBS30), FIT gel coat application booth (RTMGC-S), and the one (1) coating touch-up booth (TB1) stack (TB1S) and the one (1) flat panel coating line (FL1) stacks (BCM1S, GCM1S, TCM1S, BCDOS, GCDOS, and TCDOS) while the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps.

(c) Monthly inspections shall be performed of the coating emissions from the stacks SBS30, RTMGC-S, TB1S, BCM1S, GCM1S, TCM1S, BCDOS, GCDOS, and TCDOS and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in particulate matter emissions, or when evidence of particulate matter emission is observed, the Permittee shall take reasonable response steps.

Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response required by this condition. Failure to take a reasonable response shall be considered a deviation from this permit.

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

D.1.9 Record Keeping Requirement

(a) To document the compliance status with Conditions D.1.1 and D.1.2, the Permittee shall maintain the following records in accordance with (1) and (4) below. Records necessary to demonstrate compliance shall be available not later than thirty (30) days after the end of each compliance period.

(1) The VOC content each coating, mold release agent, gel coat, resin, catalyst, and solvent used.

(2) The amount of each coating, mold release agent, gel coat, resin, catalyst, and solvent used on a monthly basis.

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

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

(3) The total VOC usage for each month.

(4) The calculated total weight of VOC emissions from coatings, mold release agents, resin, gel coat, catalyst, and solvent used for each compliance period.

(b) To document the compliance status with Condition D.1.5, the Permittee shall maintain the following training records:

(1) A copy of the current training program; and

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

(c) To document the compliance status with Condition D.1.8, the Permittee shall maintain a log of weekly overspray observations, weekly monitoring of the water level in the pans, daily and monthly inspections. The Permittee shall include in its daily record when a daily inspection is not performed and the reason for the lack of an inspection (e.g. the process did not operate that day).

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

D.1.10 Reporting Requirements

A quarterly summary of the information to document the compliance status with Conditions D.1.1 and D.1.2 shall be submitted using the reporting forms located at the end of this permit, or their equivalent, not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting Requirements contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: Insignificant Activities

(a) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations, including the following:

(1) One (1) department for Urethane Machining, identified as UM, constructed in 2008, with a capacity of 1451.73 pounds of molded urethane per hour, and with particulate emissions controlled by three (3) Grizzly G0638 baghouses, identified as DC1, DC2, and DC3, controlling Urethane Machining Operations, and venting inside the building.

(2) One (1) department for Woodworking Operations, identified as WW, constructed in 2008, with a capacity of 500 pounds of wood per hour, and with particulate emissions controlled by two (2) ACT 2-8 baghouses, identified as DC4 and DC5, controlling Woodworking Operations, and venting inside the building.

(g) One (1) flat panel brush cleaner, Identified as FLPB1, approved in 2016 for construction, used to remove debris from flat panels before coating, using one (1) 1400 acfm baghouse (DC6) with an outlet grain loading of 0.001 gr/acfm for particulate control, and exhausting inside of the building.

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

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

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

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

(a) the particulate matter (PM) emissions from the Urethane Machining (UM) facility shall not exceed 3.31 pounds per hour, when operating at a process weight rate of 1,452 pounds per hour.

(b) the particulate matter (PM) emissions from the Woodworking Operations (WW) facility shall not exceed 1.62 pounds per hour, when operating at a process weight rate of 500 pounds per hour.

(c) the particulate matter (PM) emissions from the Flat Line Panel Brush Cleaner (FLPB1) shall not exceed 1.58 pounds per hour when operating at a process weight rate of 0.24 tons per hour.

The pounds per hour limitations were calculated with the following equation:

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

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

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

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

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

D.2.3 Particulate Control

(a) In order to assure compliance with Condition D.2.1, the five (5) baghouses (DC1, DC2, DC3, DC4, and DC5) for particulate control shall be in operation and control emissions from the Urethane Machining (UM), and Woodworking Operations (WW) facilities at all times these facilities ~~is~~ are in operation.

(b) 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.2.4 Broken or Failed Bag Detection

(a) For a single compartment baghouses controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

(b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the 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 baghouse's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

SECTION E.1 NESHAP

Emissions Unit Description: Reinforced Plastic Production

(c) One (1) reciprocator, performing FIT gel coat application and resin flow coating lamination, identified as RGR1, approved in 2015 for construction, with a maximum production rate of 1.00 part per hour, equipped with a dry filter bank for particulate control, and exhausting to stack RGR1-S.

Under 40 CFR 63, Subpart WWWW, this emission unit is considered a new unit at a new affected source;

(d) Two (2) reciprocators, performing FIT gel coat application and resin flow coating lamination, identified as RGR2 and RGR3, approved in 2015 for construction, each with a maximum production rate of 1.00 part per hour, each equipped with a dry filter bank for particulate control, and exhausting to stacks RGR1-S and RGR1-S, respectively.

Under 40 CFR 63, Subpart WWWW, these emission units are considered new units at a new affected source;

(e) Two (2) portable FIT gel coat application guns, identified as PGG1 and PGG2, approved in 2015 for construction, each with a maximum production rate of 3.00 parts per hour, equipped with a dry filter bank for particulate control, and exhausting to stack RGR1-S.

Under 40 CFR 63, Subpart WWWW, these emission units are considered new units at a new affected source;

(f) One (1) non-atomizing portable chop gun, identified as PCG1, approved in 2015 for construction, with a maximum production rate of 3.00 parts per hour, equipped with dry filter banks for the control of particulate matter emissions, and exhausting through stack RGR1-S.

Under 40 CFR 63, Subpart WWWW, this emission unit is considered a new unit at a new affected source;

(g) One (1) resin transfer molding operation, identified as RTM1, approved in 2015 for construction, with a maximum production rate of 2.50 parts per hour, no control and exhausting inside the building.

Under 40 CFR 63, Subpart WWWW, this emission unit is considered a new unit at a new affected source;

(h) One (1) fluid impingement technology (FIT) gel coat application booth, identified as RTMGC, approved in 2015 for construction, with a maximum production rate of 2.50 parts per hour, equipped with a dry filter bank for the control of particulate matter emissions, and exhausting through stack RTMGC-S.

Under 40 CFR 63, Subpart WWWW, this emission unit is considered a new unit at a new affected source; and

(i) One (1) mold preparation operation, identified as RTMMP, approved in 2015 for construction, with a maximum production rate of 2.50 parts per hour no control and exhausting inside the building.

Under 40 CFR 63, Subpart WWWW, this emission unit is considered a new unit at a new affected source.

(j) One portable chop gun (open molding), identified as PCG2, using one (1) non-

atomized fluid impingement applicator, approved in 2015 for construction, with a maximum capacity of 3 parts per hour, using dry filters as control, and exhausting to stack RGR1-S.

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

(k) One portable chop gun (open molding), identified as PGG3, using one (1) non-atomized fluid impingement applicator, approved in 2015 for construction, with a maximum capacity of 3 parts per hour, using dry filters as control, and exhausting to stack RGR1-S.

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

Insignificant Activities:

(b) One (1) bulk resin tank, approved in 2015 for construction, identified as BT1, with a maximum capacity of 5,000 gallons, and exhausting to stack BTV1.

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

(c) One (1) polyster tank, approved in 2015 for construction, identified as BT2, with a maximum capacity of 5,000 gallons, and exhausting to stack BT2V.

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

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

National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements [326 IAC 2-7-5(1)]

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

(a) Pursuant to 40 CFR Part 63.6665, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 20-1-1, as specified in Table 15 of 40 CFR Part 63, Subpart WWWW.

(b) Pursuant to 40 CFR 63.10, 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.1.2 NESHAP for Reinforced Plastic Composites Production [326 IAC 20-56][40 CFR Part 63, Subpart WWWW]

The Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart WWWW (included as Attachment A of the operating permit), which are incorporated by reference as 326 IAC 20-56, for the facilities listed in Section E.1:

(1) 40 CFR 63.5780
(2) 40 CFR 63.5785
(3) 40 CFR 63.5790
(4) 40 CFR 63.5795
(5) 40 CFR 63.5796
(6) 40 CFR 63.5797
(7) 40 CFR 63.5798
(8) 40 CFR 63.5799 introduction and (a)

(9) 40 CFR 63.5800
(10) 40 CFR 63.5805
(11) 40 CFR 63.5810
(12) 40 CFR 63.5835(a) and (c)
(13) 40 CFR 63.5840
(14) 40 CFR 63.5860(a)
(15) 40 CFR 63.5895(b)(1), (b)(2), (b)(3), (b)(4), (c), and (d)
(16) 40 CFR 63.5900(a)(2), (a)(4), (b), (c), and (e)
(17) 40 CFR 63.5905
(18) 40 CFR 63.5910
(19) 40 CFR 63.5915(a)(1), (a)(2), (a)(3), (c), and (d)
(20) 40 CFR 63.5920
(21) 40 CFR 63.5925
(22) 40 CFR 63.5930
(23) 40 CFR 63.5935
(24) Table 1 to 40 CFR 63, Subpart WWWW (applicable portions)
(25) Table 2 to 40 CFR 63, Subpart WWWW (applicable portions)
(26) Table 3 to 40 CFR 63, Subpart WWWW (applicable portions)
(27) Table 4 to 40 CFR 63, Subpart WWWW (applicable portions)
(28) Table 7 to 40 CFR 63, Subpart WWWW (applicable portions)
(29) Table 9 to 40 CFR 63, Subpart WWWW (applicable portions)
(30) Table 13 to 40 CFR 63, Subpart WWWW (applicable portions)
(31) Table 14 to 40 CFR 63, Subpart WWWW (applicable portions)
(32) Table 15 to 40 CFR 63, Subpart WWWW (applicable portions)

SECTION E.2 NESHAP

Emissions Unit Description:

(a) Eighteen (18) spray booths, identified as SB1 through SB18, constructed in 2008, using HVLP guns to coat molded plastic or wood parts, with a total maximum capacity of 145 parts per hour, using water pan wet collectors for particulate control, and exhausting to stacks identified as SBS1 through SBS18. These spray booths use three different coatings, each of which is mutually exclusive.

Under 40 CFR Part 63, Subpart PPPP these units are considered affected facilities.

Under 40 CFR Part 63, Subpart JJ spray booths these units are considered affected facilities.

(b) One (1) spray booth, identified as SB30 constructed in 2011, using HVLP guns to coat molded plastic or wood parts, with a maximum capacity of 12.5 parts per hour, using dry filters for particulate control, and exhausting to stack identified as SBS30.

Under 40 CFR Part 63, Subpart PPPP this unit is considered an affected facility.

(l) One plastic part flow coating operation (adhesive application), identified as AO, approved in 2015 for construction, with a maximum capacity of 3 plastic parts per hour, no control and exhausting to inside.

Under 40 CFR 63, Subpart PPPP, this is considered an affected facility.

(m) One (1) coating touch-up booth, identified as TB1, approved in 2016 for construction, with a maximum capacity of 31 parts per hour, using 6 HVLP spray guns, using dry filters for particulate control, and exhausting to stack TB1S.

Under 40 CFR 63, Subpart PPPP, this is considered an affected facility.

(n) One (1) flat panel coating line, identified as FL1, consisting of three (3) robotic spray reciprocators (BCM1, GCM1, and TCM1) and three (3) drying ovens (BCDO, GCDO, and TCDO), approved in 2016 for construction, with a maximum capacity of 310 parts per hour (flat garage door panels), using dry filters for particulate control, and exhausting to stacks BCM1S, GCM1S, TCM1S, BCDOS, GCDOS, and TCDOS.

Under 40 CFR 63, Subpart PPPP, this is considered an affected facility.

Insignificant Activity

(e) Four (4) natural gas-fired surface coating drying ovens, with no control, approved in 2015 for construction and described as follows:

ID	heat input (MMBtu/hr)	stack
DO1	0.76	DO1S
DO2	0.76	DO2S
DO3	0.97	DO3S
DO4	0.76	DO4S

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

National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements [326 IAC 2-7-5(1)]

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

(a) Pursuant to 40 CFR Part 63.6665, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 20-1-1, as specified in Table 2 of 40 CFR Part 63, Subpart PPPP.

(b) Pursuant to 40 CFR 63.10, 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 NESHAP for Surface Coating of Plastic Parts and Products [326 IAC 20-81][40 CFR Part 63, Subpart PPPP]

The Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart PPPP (included as Attachment B of the operating permit), which are incorporated by reference as 326 IAC 20-81, for the facilities listed in Section E.2:

(1) 40 CFR 63.4480
(2) 40 CFR 63.4481(a)(1),(a)(2),(b),(c),(d),(e)
(3) 40 CFR 63.4482
(4) 40 CFR 63.4483(a),(c)(1),(d)
(5) 40 CFR 63.4490(a)(1),(c)(1)
(6) 40 CFR 63.4491(a),(b)
(7) 40 CFR 63.4492(a)
(8) 40 CFR 63.4493(a)
(9) 40 CFR 63.4500(a)(1),(b)
(10) 40 CFR 63.4501
(11) 40 CFR 63.4510(a),(b),(c)(1)-(7),(c)(8)(i)-(ii)
(12) 40 CFR 63.4520(a)(1)-(6)
(13) 40 CFR 63.4530(a),(b),(c)(1)-(3),(d),(e),(f),(g),(h)
(14) 40 CFR 63.4531
(15) 40 CFR 63.4540
(16) 40 CFR 63.4541
(17) 40 CFR 63.4542
(18) 40 CFR 63.4550
(19) 40 CFR 63.4551
(20) 40 CFR 63.4552
(21) 40 CFR 63.4580
(22) 40 CFR 63.4581
(23) 40 CFR 63, Subpart PPPP, Tables 2,3,4
(24) 40 CFR 63, Subpart PPPP, Appendix A

SECTION E.3 NESHAP

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

Wood furniture Manufacturing Operations

(a) Eighteen (18) spray booths, identified as SB1 through SB18, constructed in 2008, using HVLP guns to coat molded plastic or wood parts, with a total maximum capacity of 145 parts per hour, using water pan wet collectors for particulate control, and exhausting to stacks identified as SBS1 through SBS18. These spray booths use three different coatings, each of which is mutually exclusive.

Under 40 CFR Part 63, Subpart PPPP these units are considered affected facilities.

Under 40 CFR Part 63, Subpart JJ spray booths these units are considered affected facilities.

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

National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements [326 IAC 2-7-5(1)]

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

(a) Pursuant to 40 CFR Part 63.6665, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 20-1-1, as specified in Table 1 of 40 CFR Part 63, Subpart JJ.

(b) Pursuant to 40 CFR 63.10, 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.3.2 NESHAP for Wood Furniture Manufacturing Operations [40 CFR Part 63, Subpart JJ]

The Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart JJ (included as Attachment C of the operating permit), for the facilities listed in Section E.3:

(1) 40 CFR 63.800(a)
(2) 40 CFR 63.801

SECTION E.4 NESHAP

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

(5) One (1) natural gas-fired emergency generator, constructed in 2000, with a maximum heat input capacity of 0.05 million Btu per hour.

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

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

National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements [326 IAC 2-7-5(1)]

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

(a) Pursuant to 40 CFR Part 63.6665, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 20-1-1, as specified in Table 8 of 40 CFR Part 63, Subpart ZZZZ.

(b) Pursuant to 40 CFR 63.10, 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.4.2 NESHAP for Stationary Reciprocating Internal Combustion Engines [326 IAC 20-82][40 CFR Part 63, Subpart ZZZZ]

The Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart ZZZZ (included as Attachment D of the operating permit), which are incorporated by reference as 326 IAC 20-82, for the facilities listed in Section E.4:

(1) 40 CFR 63.6580
(2) 40 CFR 63.6585
(3) 40 CFR 63.6590(a)(1)(ii)
(4) 40 CFR 63.6595(b)(2)
(5) 40 CFR 63.6602
(6) 40 CFR 63.6605(a)-(b)
(7) 40 CFR 63.6625(e),(f)(1)-(2), (h), (j)
(8) 40 CFR 63.6640(a),(b), (e),(f)(1)-(3)
(9) 40 CFR 63.6645
(10) 40 CFR 63.6655(a), (a)(1),(d)-(f)
(11) 40 CFR 63.6660(a)-(c)
(12) 40 CFR 63.6665
(13) 40 CFR 63.6670
(14) 40 CFR 63.6675
(15) Table 2c.6 Subpart ZZZZ of Part 63
(16) Table 6.9.a.i-ii Subpart ZZZZ of Part 63
(17) Table 8 to Subpart ZZZZ of Part 63

SECTION E.5 NESHAP

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

Insignificant activity

(e) Four (4) natural gas-fired surface coating drying ovens, with no control, approved in 2015 for construction and described as follows:

ID	heat input (MMBtu/hr)	stack
DO1	0.76	DO1S
DO2	0.76	DO2S
DO3	0.97	DO3S
DO4	0.76	DO4S

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

National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements [326 IAC 2-7-5(1)]

E.5.1 General Provisions Relating to NESHAP [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, except as otherwise specified in 40 CFR 63, Subpart DDDDD.

(b) Pursuant to 40 CFR 63.10, 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

and

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

E.5.2 NESHAP for Industrial, Commercial, and Institutional Boilers and Process Heaters [326 IAC 20-56][40 CFR Part 63, Subpart DDDDD]

The Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart DDDDD (included as Attachment E of the operating permit), which are incorporated by reference as 326 IAC 20-95, for the facilities listed in Section E.5:

(1) 40 CFR 63.7480
(2) 40 CFR 63.7485
(3) 40 CFR 63.7490
(4) 40 CFR 63.7491
(5) 40 CFR 63.7495
(6) 40 CFR 63.7499
(7) 40 CFR 63.7500(a), (e) and (f)
(8) 40 CFR 63.7501
(9) 40 CFR 63.7505
(10) 40 CFR 63.7510

(11) 40 CFR 63.7515
(12) 40 CFR 63.7525(d), (e) and (f)
(13) 40 CFR 63.7540(a)(11) and (e)(12)
(14) 40 CFR 63.7545(a) and (c)
(15) 40 CFR 63.7550
(16) 40 CFR 63.7555
(17) 40 CFR 63.7560
(18) 40 CFR 63.7565
(19) 40 CFR 63.7570
(20) 40 CFR 63.7575

DRAFT

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

PART 70 OPERATING PERMIT CERTIFICATION

Source Name: J. P., Inc. d/b/a Jasper Plastics Solutions
Source Address: 501 West Rilroad Ave., Syracuse, Indiana 46567
Part 70 Permit No.: T085-32217-00013

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: J. P., Inc. d/b/a Jasper Plastics Solutions
Source Address: 501 West Railroad Ave., Syracuse, Indiana 46567
Part 70 Permit No.: T085-32217-00013

This form consists of 2 pages **Page 1 of 2**

□ This is an emergency as defined in 326 IAC 2-7-1(12)

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

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

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

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If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

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

Part 70 Quarterly Report

Source Name: J.P. Inc., d/b/a Jasper Plastic Solution
Source Address: 501 West Railroad Ave., Syracuse, Indiana 46567
Part 70 Permit No.: T085-32217-00013
Facility: Surface coating booths (SB1- SB18 and SB30); the gel coat application operations (RTMGC, RGR1, RGR2, RGR3, PCG1, PGG2); Resin Transfer Molding Unit (RTM1) and Mold Preparation Operation (RTMMP)
Parameter: VOC Emissions
Limit: The total sum of VOC usage (from coatings, mold release agents, resins, gelcoats, catalysts coatings, dilution solvents, and cleaning solvents) at the surface coating booths (SB1- SB18 and SB30); the gel coat application operations (RTMGC, RGR1, RGR2, RGR3, PCG1, PGG2); Resin Transfer Molding Unit (RTM1), Mold Preparation Operation (RTMMP) and portable chop guns (PCG2 and PGG3) shall be limited such that the VOC emissions shall not exceed 245.0 tons per twelve (12) consecutive months period with compliance determined at the end of each month.

QUARTER: YEAR:

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

☐ No deviation occurred in this quarter.

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

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

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

Part 70 Quarterly Report

Source Name: J.P. Inc., d/b/a Jasper Plastic Solution
Source Address: 501 West Railroad Ave., Syracuse, Indiana 46567
Part 70 Permit No.: T085-32217-00013
Facility: Flat Panel Coating Line (FL1) and the Coating Touchup Booth (TB1)
Parameter: VOC Emissions
Limit: The total sum of VOC input (from coatings, catalysts coatings, dilution solvents, and cleaning solvents) at the surface coating Flat Panel Coating Line (FL1) and the Coating Touchup Booth (TB1) shall not exceed 24.9 tons per twelve (12) consecutive months period with compliance determined at the end of each month.

QUARTER: YEAR:

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

☐ No deviation occurred in this quarter.

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

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

DRAFT

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: J. P., Inc. d/b/a Jasper Plastics Solutions
Source Address: 501 West Railroad Ave., Syracuse, Indiana 46567
Part 70 Permit No.: T085-32217-00013

Months: to Year:

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".

☐ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

☐ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

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

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

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

Form Completed by:_____

Title / Position: _____

Date:_____

Phone: _____

Indiana Department of Environmental Management
Office of Air Quality

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

Source Description and Location

Source Name:	J. P., Inc. d/b/a Jasper Plastics Solutions
Source Location:	501 West Railroad Ave., Syracuse, Indiana 46567
County:	Kosciusko
SIC Code:	3089 (Plastics Products, Not Elsewhere Classified)
Operation Permit No.:	T085-32217-00013
Operation Permit Issuance Date:	February 1, 2013
Significant Source Modification No.:	085-36655-00013
Significant Permit Modification No.:	085-36657-00013
Permit Reviewer:	APT

Existing Approvals

The source was issued Part 70 Operating Permit Renewal No. T085-32217-00013 on February 1, 2013. The source has since received the following approvals:

Permit Type	Permit Number	Issuance Date
Significant Permit Modification	085-33674-00013	January 28, 2014
Significant Source Modification	085-35092-00013	February 24, 2015
Second Significant Permit Modification	085-35096-00013	March 12, 2015
Minor Source Modification	085-35787-00013	June 5, 2015
Third Significant Permit Modification	085-35814-00013	July 29, 2015

County Attainment Status

The source is located in Kosciusko County.

Pollutant	Designation
SO_2	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O_3	Unclassifiable or attainment effective July 20, 2012, for the 2008 8-hour ozone standard.[1]
$PM_{2.5}$	Unclassifiable or attainment effective April 5, 2005, for the annual $PM_{2.5}$ standard.
$PM_{2.5}$	Unclassifiable or attainment effective December 13, 2009, for the 24-hour $PM_{2.5}$ standard.
PM_{10}	Unclassifiable effective November 15, 1990.
NO_2	Cannot be classified or better than national standards.
Pb	Unclassifiable or attainment effective December 31, 2011.

[1]Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005.

(a) Ozone Standards

Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to ozone. Kosciusko County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

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

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

Fugitive Emissions

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

Source Status - Existing Source

The table below summarizes the potential to emit of the entire source, prior to the proposed modification, after consideration of all enforceable limits established in the effective permits. These emissions are based upon Minor Source Modification No.:085-35787-00013 issued on June 5, 2015 and Significant Permit Modification No.:085-35814-00013 issued on July 29, 2015.

Process/ Emission Unit	Potential To Emit of the Entire Source before Issuance of Modification (tons/year)								
	PM	PM_{10}*	$PM_{2.5}$*	SO_2	NO_x	VOC	CO	Total HAPs	Worst Single HAP
Surface Coating Booths (SB1 - SB18)	16.78	16.78	16.78	-	-	245 (1)	-	14.27	8.92 - Toluene
Surface Coating Booths (SB30)	4.42	4.42	4.42	-	-		-	-	0
Reciprocator and Portable FIT Gel Coat Application (RGR1, RGR2, RGR3, and PGG1)	-	-	-	-	-		-	102.52	102.52 - Styrene
Reciprocator and Portable FIT Gel Coat Application (RGR1, RGR2, RGR3, and PGG1 solvent)	-	-	-	-	-		-	-	0
Portable FIT Gel Coat Application (PCG1 and PGG2)	-	-	-	-	-		-	6.70	6.7 - Styrene
Portable FIT Gel Coat Application (PCG1 and PGG2 solvent)	-	-	-	-	-		-	-	0
Resin Transfer Molding (RTM1)	-	-	-	-	-		-	3.99	3.73 Styrene
FIT Gel Coating Application Booth (RTMGC)	1.14	1.14	1.14	-	-		-	3.76	3.76 - Styrene
Mold Preparation Operation (RTMMP Solvent)	-	-	-	-	-		-	-	0
portable chop gun (PCG2)	-	-	-	-	-		-	2.23	2.23- Styrene
portable chop gun (PGG3)	-	-	-	-	-		-	3.91	3.91- Styrene
Urethane Machining (UM)	45.05	45.05	45.05	-	-	-	-	-	-
Woodworking (WW)	0.23	0.23	0.23	-	-	-	-	-	0
hand grinders (HGR1 through HGR10)	18.77	18.77	18.77	-	-	-	-	-	0

Process/ Emission Unit	Potential To Emit of the Entire Source before Issuance of Modification (tons/year)								
	PM	**PM_{10}***	**$PM_{2.5}$***	**SO_2**	**NO_x**	**VOC**	**CO**	**Total HAPs**	**Worst Single HAP**
Polyurethane molding (P1 - P6)	-	-	-	-	-	0.19	-	0.0971	0.097 - MDI
R&D Polyurethane molding (P7)	-	-	-	-	-	0.004	-	0.002	0
Storage Tanks (PT1-PT3, IT1, IT2)	-	-	-	-	-	0.0007	-	0.00001	0.00001 - MDI
Emergency generator	0.000001	0.0001	0.0001	0.000007	0.05	0.0015	0.004	0.0009	0.0007 - Formaldehyde
plastic part flow coating operation (AO)	-	-	-	-	-	1.37	-	1.37	1.29 - MDI
Bulk Tank BT2	-	-	-	-	-	0.02	-	0.02	0.02- Styrene
space heaters (OH1 and AM1-AM8)	0.05	0.20	0.20	0.02	2.68	0.15	2.25	0.05	0.05 - Hexane
drying ovens (DO1-DO4)	0.03	0.11	0.11	0.01	1.49	0.08	1.25	0.03	0.03- Hexane
Water Jet Cutter (WJ1)	-	-	-	-	-	-	-	-	-
Total PTE of Entire Source	**86.47**	**86.71**	**86.71**	**0.03**	**4.22**	**246.82**	**3.51**	**137.49**	**>10 (styrene)**
Title V Major Source Thresholds	NA	100	100	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	NA	NA

*$PM_{2.5}$ listed is direct $PM_{2.5}$.
MDI = methylene diphenyl diisocyanate

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

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

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

(b) This existing source is a major source of HAPs, as defined in 40 CFR 63.2, because HAP emissions are greater than ten (10) tons per year for a single HAP and greater than twenty-five (25) tons per year for a combination of HAPs. Therefore, this source is a major source under Section 112 of the Clean Air Act (CAA).

Description of Proposed Modification

The Office of Air Quality (OAQ) has reviewed a modification application, submitted by J. P., Inc. d/b/a Jasper Plastics Solutions on December 28, 2015, relating to addition of new emission units at the source. The following is a list of the proposed emission units and pollution control device(s):

(a) One (1) flat panel brush cleaner, Identified as FLPB1, approved in 2016 for construction, used to remove debris from flat panels before coating, using one (1) 1400 acfm baghouse (DC6) with an outlet grain loading of 0.001 gr/acfm for particulate control, and exhausting inside of the building.

(b) One (1) flat panel coating line, identified as FL1, consisting of three (3) robotic spray reciprocators (BCM1, GCM1, and TCM1) and three (3) drying ovens (BCDO, GCDO, and TCDO), approved in 2016 for construction, with a maximum capacity of 310 parts per hour (flat garage door panels), using dry filters for particulate control, and exhausting to stacks BCM1S, GCM1S, TCM1S, BCDOS, GCDOS, and TCDOS.

(c) One (1) coating touch-up booth, identified as TB1, approved in 2016 for construction, with a maximum capacity of 31 parts per hour, using 6 HVLP spray guns, using dry filters for particulate control, and exhausting to stack TB1S.

(d) One (1) natural gas-fired, direct-fired, flat line air makeup unit for space heating, identified as FLAM1, approved in 2016 for construction, with a maximum heat input capacity of 2.7 MMBtu/hour.

Enforcement Issues

There are no pending enforcement actions related to this modification.

Emission Calculations

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

Permit Level Determination – Part 70 Modification to an Existing Source

Pursuant to 326 IAC 2-1.1-1(12), 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 Modification (New Units)

Process	Unit ID	PM	PM10	PM2.5	SO2	NOx	VOC	CO	Total HAPs	Worst single HAP	
Flat Line Panel Brush	FLPB1	5.26	5.26	5.26	-	-	-	-	-	-	-
Flat Panel Coating Line	FL1	87.05	87.05	87.05	-	-	36.03	-	-	-	-
Coating Touchup Booth	TB1	3.18	3.18	3.18	-	-	1.45	-	-	-	-
Flat Line Air Makeup Unit	FLAM1	0.02	0.09	0.09	0.01	1.16	0.06	0.97	0.02	0.02	Hexane
Total		**95.51**	**95.57**	**95.57**	**0.01**	**1.16**	**37.54**	**0.97**	**0.02**	**0.02**	**Hexane**

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

This source modification is subject to 326 IAC 2-7-10.5(g)(4) because the potential emissions of PM, PM10, PM2.5, and VOC are each greater than 25 tons per year. Additionally, the modification will be incorporated into the Part 70 Operating Permit through a significant permit

modification issued pursuant to 326 IAC 2-7-12(d) because the modification requires significant changes in existing Part 70 monitoring 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 source modification and permit modification, and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of Modification (tons/year)								
	PM	PM_{10}*	$PM_{2.5}$*	SO_2	NO_x	VOC	CO	Total HAPs	Worst Single HAP
Surface Coating Booths (SB1 - SB18)	16.78	16.78	16.78	-	-	245 (1)	-	14.27	8.92 - Toluene
Surface Coating Booths (SB30)	4.42	4.42	4.42	-	-		-	-	0
Reciprocator and Portable FIT Gel Coat Application (RGR1, RGR2, RGR3, and PGG1)	-	-	-	-	-		-	102.52	102.52 - Styrene
Reciprocator and Portable FIT Gel Coat Application (RGR1, RGR2, RGR3, and PGG1 solvent)	-	-	-	-	-		-	-	0
Portable FIT Gel Coat Application (PCG1 and PGG2)	-	-	-	-	-		-	6.70	6.7 - Styrene
Portable FIT Gel Coat Application (PCG1 and PGG2 solvent)	-	-	-	-	-		-	-	0
Resin Transfer Molding (RTM1)	-	-	-	-	-		-	3.99	3.73 Styrene
FIT Gel Coating Application Booth (RTMGC)	1.14	1.14	1.14	-	-		-	3.76	3.76 - Styrene
Mold Preparation Operation (RTMMP Solvent)	-	-	-	-	-		-	-	0
portable chop gun (PCG2)	-	-	-	-	-		-	2.23	2.23
portable chop gun (PGG3)	-	-	-	-	-		-	2.88	2.88
Coating Touchup Booth, TB1	0.16	0.16	0.16	-	-		-	-	-
Flat Panel Coating Line, FL1	4.35	4.35	4.35	-	-		-	-	-
Flat Line Panel Brush, FLPB1	0.16	0.16	0.16	-	-	-	-	-	-
Flat Line Air Makeup Unit, FLAM1	0.02	0.09	0.09	0.01	1.16	0.06	0.97	0.02	0.02 Hexane
Urethane Machining (UM)	45.05	45.05	45.05	-	-	-	-	-	-
Woodworking (WW) (2)	0.23	0.23	0.23	-	-	-	-	-	0
hand grinders (HGR1 through HGR10)	18.77	18.77	18.77	-	-	-	-	-	0
Polyurethane molding (P1 - P6)	-	-	-	-	-	0.19	-	0.0971	0.097 - MDI
R&D Polyurethane molding (P7)	-	-	-	-	-	0.004	-	0.002	0
Storage Tanks (PT1-PT3, IT1, IT2)	-	-	-	-	-	0.0007	-	0.00001	0.00001 - MDI
Emergency generator	0.000001	0.0001	0.0001	0.000007	0.05	0.0015	0.004	0.0009	0.0007 - Formaldehyde
plastic part flow coating operation (AO)	-	-	-	-	-	1.37	-	1.37	1.29 - MDI
Bulk Tank BT2	-	-	-	-	-	0.02	-	0.02	0.02
space heaters (OH1 and AM1-AM8)	0.05	0.20	0.20	0.02	2.68	0.15	2.25	0.05	0.05
drying ovens (DO1-DO4)	0.03	0.11	0.11	0.01	1.49	0.08	1.25	0.03	0.03
Water Jet Cutter (WJ1)	-	-	-	-	-	-	-	-	-

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of Modification (tons/year)								
	PM	**PM_{10}***	**$PM_{2.5}$***	**SO_2**	**NO_x**	**VOC**	**CO**	**Total HAPs**	**Worst Single HAP**
Total PTE of Entire Source	**96.26**	**96.57**	**96.57**	**0.03**	**5.38**	**246.89**	**4.48**	**138.98**	**>10 (styrene)**
Title V Major Source Thresholds	NA	100	100	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	NA	NA

*$PM_{2.5}$ listed is direct $PM_{2.5}$.
MDI = methylene diphenyl diisocyanate

Notes:
(1) Flat Panel Coating Line (FL1) and Coating Touchup Booth (TB1) are also limited below 25 tpy for 326 IAC 8-1-6 BACT avoidance.
(2) Based on this ruling (Cause Nos. 92-A-J-730 and 92-A-J-833), potential emissions for particulate matter from woodworking operations were calculated after consideration of the controls for determining operating permit level purposes and PSD applicability.

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

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

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 is based on the existing source-wide VOC PSD Minor Limit with the inclusion of the Flat Panel Coating Line (FL1) and the Coating Touchup Booth (TB1) as follows:

In order to render 326 IAC 2-2(Prevention of Significant Deterioration (PSD)) not applicable, the total sum of VOC usage (from coatings, mold release agents, resins, gelcoats, catalysts coatings, dilution solvents, and cleaning solvents) at the following:

(a) surface coating booths (SB1- SB18 and SB30),
(b) gel coat application operations (RTMGC, RGR1, RGR2, RGR3, PCG1 and PGG2),
(c) Resin Transfer Molding Unit (RTM1),
(d) Mold Preparation Operation (RTMMP)
(e) portable chop guns (PCG2 and PGG3)
(f) Flat Panel Coating Line (FL1), and
(g) Coating Touchup Booth (TB1)

shall be limited such that the VOC emissions shall not exceed 245.0 tons per twelve (12) consecutive months period with compliance determined at the end of each month.

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

Federal Rule Applicability Determination

The following federal rules are being evaluated for this source due to this modification:

New Source Performance Standards (NSPS):

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

National Emission Standards for Hazardous Air Pollutants (NESHAP):

Subpart PPPP

The one (1) flat panel coating line, identified as FL1, consisting of three (3) spray machines (BCM1, GCM1, and TCM1) and three (3) drying ovens (BCDO, GCDO, and TCDO), and the one (1) coating touch-up booth, identified as TB1 are subject to the provisions of the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products, Subpart PPPP (which is incorporated by reference as 326 IAC 20-81), because these facilities are considered plastic coating operations under this NESHAP and these facilities will be located at the major source of HAPs.

Nonapplicable portions of the NESHAP will not be included in the permit. The Permittee has chosen to comply with the requirements by using the emission rate without add-on control devices, therefore, testing requirements under this NESHAP have not been included in the permit for these emission units. These units are subject to the following portions of Subpart PPPP:

(1) 40 CFR 63.4480
(2) 40 CFR 63.4481(a)(1),(a)(2),(b),(c),(d),(e)
(3) 40 CFR 63.4482
(4) 40 CFR 63.4483(a),(c)(1),(d)
(5) 40 CFR 63.4490(a)(1),(c)(1)
(6) 40 CFR 63.4491(a),(b)
(7) 40 CFR 63.4492(a)
(8) 40 CFR 63.4493(a)
(9) 40 CFR 63.4500(a)(1),(b)
(10) 40 CFR 63.4501
(11) 40 CFR 63.4510(a),(b),(c)(1)-(7),(c)(8)(i)-(ii)
(12) 40 CFR 63.4520(a)(1)-(6)
(13) 40 CFR 63.4530(a),(b),(c)(1)-(3),(d),(e),(f),(g),(h)
(14) 40 CFR 63.4531
(15) 40 CFR 63.4540
(16) 40 CFR 63.4541
(17) 40 CFR 63.4542
(18) 40 CFR 63.4550
(19) 40 CFR 63.4551
(20) 40 CFR 63.4552
(21) 40 CFR 63.4580
(22) 40 CFR 63.4581
(23) 40 CFR 63, Subpart PPPP, Tables 2,3, and 4
(24) 40 CFR 63, Subpart PPPP, Appendix A

The provisions of 40 CFR 63 Subpart A – General Provisions, which are incorporated as 326 IAC 20-1-1, apply to these emission units except when otherwise specified in 40 CFR 63 Subpart PPPP.

Note: This source is already subject to this NESHAP even prior to this modification.

40 CFR Part 63, Subpart DDDDD

This subpart establishes national emission limitations and work practice standards for hazardous air pollutants (HAP) emitted from industrial, commercial, and institutional boilers and process heaters located at major sources of HAP. The one (1) new natural gas-fired flat line air makeup unit, identified as FLAM1, is direct fired and used for space heating. Therefore, this unit does not meet the definition of a process heater as defined in 40 CFR Part 63.7575 (process heaters do not include units used for comfort heat or space heat), and does not meet the applicability criteria of this rule.

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.

Compliance Assurance Monitoring (CAM):

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	**Pollutant**	**Control Device Used? (Y/N)**	**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)
Coating Touchup Booth, TB1	PM10	Y	N	<100	<100	100	N	NA
	PM2.5	Y	N	<100	<100	100	N	NA
	VOC	N	Y	<100	<100	100	N	NA
	single HAP	CAM is not applicable because it is subject to the requirements of NESHAP, Subpart PPPP						
	combined HAPs							
Flat Panel Coating Line, FL1	PM10	Y	N	<100	<100	100	N	NA
	PM2.5	Y	N	<100	<100	100	N	NA
	VOC	N	Y	<100	<100	100	N	NA
	single HAP	CAM is not applicable because it is subject to the requirements of NESHAP, Subpart PPPP						
	combined HAPs							
Flat Line Panel Brush, FLPB1	PM10	Y	N	<100	<100	100	N	NA
	PM2.5	Y	N	<100	<100	100	N	NA
	VOC	N	N	<100	<100	100	N	NA
Flat Line Air Makeup Unit, FLAM1	CAM not applicable because this emission unit is not equipped with an add-on control							

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 being evaluated for this source due to the modification:

326 IAC 2-2 (PSD)

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

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

The operation of the new units (FLPB1, FL1, TB1, and FLAM1) will emit less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year for a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply to this modification.

326 IAC 2-6 (Emission Reporting)

Since this source is required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program, this source is subject to 326 IAC 2-6 (Emission Reporting). In accordance with the compliance schedule in 326 IAC 2-6-3, an emission statement must be submitted triennially. The first report is due no later than July 1, 2016, and subsequent reports are due every three (3) years thereafter. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

326 IAC 2-7-6(5) (Annual Compliance Certification)

The U.S. EPA Federal Register 79 FR 54978 notice does not exempt Title V Permittees from the requirements of 40 CFR 70.6(c)(5)(iv) or 326 IAC 2-7-6(5)(D), but the submittal of the Title V annual compliance certification to IDEM satisfies the requirement to submit the Title V annual compliance certifications to EPA. IDEM does not intend to revise any permits since the requirements of 40 CFR 70.6(c)(5)(iv) or 326 IAC 2-7-6(5)(D) still apply, but Permittees can note on their Title V annual compliance certification that submission to IDEM has satisfied reporting to EPA per Federal Register 79 FR 54978. This only applies to Title V Permittees and Title V compliance certifications.

State Rule Applicability Determination - Individual Units

Flat Line Panel Brush (FLPB1)

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

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the Flat Line Panel Brush Cleaner (FLPB1) shall not exceed 1.58 pounds per hour when operating at a process weight rate of 0.24 tons per hour. The pound per hour limitation was calculated with the following equation:

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

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

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

The uncontrolled PM emission rate from this process is estimated at 1.20 lb/hour which is less than the allowable PM emission rate of 1.58 pounds per hour. Therefore, this process is able to comply with this requirement.

Flat Line Air Makeup Unit (FLAM1)

Pursuant to 326 IAC 6-3-1(b)(14), the one Flat Line Air Makeup Unit (FLAM1) is exempt from the requirements of this rule because it is a manufacturing process with potential emissions less than five hundred fifty-one thousandths (0.551) pound per hour.

Flat Panel Coating Line (FL1) and Coating Touchup Booth (TB1)

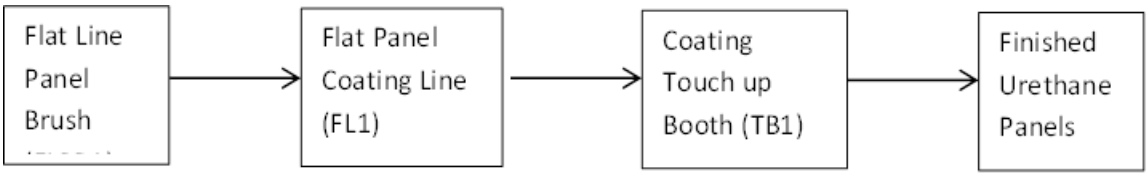
326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

Pursuant to 326 IAC 6-3-2(d), particulate from the surface coating booths identified as FL1 and TB1 shall be controlled by a dry particulate filter, waterwash, or an equivalent control device and the Permittee shall operate the control device in accordance with manufacturer's specifications.

326 IAC 8-1-6 (New Facilities; General Reduction Requirements)

The provisions of this rule apply to new facilities (as of January 1, 1980) that have potential emissions of twenty-two and seven-tenths (22.7) megagrams (twenty-five (25) tons) or more per year of VOC, are located anywhere in the state; and are not otherwise regulated by other provisions of article 8.

The one (1) Coating Touchup Booth is used solely for touch up of units coated in Flat Panel Coating Line (FL1). Therefore, even though the potential emissions from this booth are below 25 tons per year, it is considered part of the FL1 line (see diagram below). For the purposes of 326 IAC 8-1-6, these units have been determined to be a single facility.



The one (1) Flat Panel Coating Line and Coating Touch up Booth (TB1) have a combined potential to emit VOC greater than 25 tons per year. Therefore, VOC emissions from the Flat Panel Coating Line (FL1) and Coating Touch up Booth (TB1) shall be limited as follows:

(a) The amount of VOC delivered to the Flat Panel Coating Line (FL1) and the Coating Touchup Booth (TB1) shall collectively not exceed twenty-four and nine tenths (24.9) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with this limit shall limit total potential to emit of VOC to less than twenty-five (25) tons per twelve (12) consecutive month period from TB1 and FL1 and shall render the requirements of 326 IAC 8-1-6 (New Facilities ; General Reduction Requirements) not applicable to TB1 and FL1.

326 IAC 8-2 Surface Coating Emission Limitations

These booths coat urethane garage door panels and do not perform any of the following processes:

326 IAC 8-2-2 Automobile and light duty truck coating operations
326 IAC 8-2-3 Can coating operations
326 IAC 8-2-4 Coil coating operations
326 IAC 8-2-5 Paper coating operations
326 IAC 8-2-6 Metal furniture coating operations
326 IAC 8-2-7 Large appliance coating operations
326 IAC 8-2-8 Magnet wire coating operations
326 IAC 8-2-9 Miscellaneous metal coating operations
326 IAC 8-2-10 Flat wood panels; manufacturing operations
326 IAC 8-2-11 Fabric and vinyl coating
326 IAC 8-2-12 Wood furniture and cabinet coating
326 IAC 8-2-13 Marine vessel surface coating (Repealed)

Other 326 IAC 8 rules
These booths do not meet the applicability criteria in the following rules:

Rule 8-3	Organic Solvent Degreasing Operations
Rule 8-4	Petroleum Sources
Rule 8-5	Miscellaneous Operations
Rule 8-6	Organic Solvent Emission Limitations
Rule 8-7	Specific VOC Reduction Requirements for Lake/Porter/Clark/Floyd Counties
Rule 8-8	Municipal Solid Waste Landfills Located in Clark/Floyd/Lake/Porter Counties
Rule 8-9	Volatile Organic Liquid Storage Vessels
Rule 8-10	Automobile Refinishing
Rule 8-11	Wood Furniture Coatings

No other Article 8 rules apply to this modification

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.

Changes to the compliance determination and monitoring requirements are detailed in the Proposed Changes section of this document.

Compliance determination and monitoring requirements specific to this modification are as follows:

Compliance Determination Requirements

Compliance with the VOC usage limitation in Condition D.1.2 (326 IAC 8-1-6) for TB1 and FL1 shall be determined based upon the following criteria:

(a) Pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a), the Permittee shall prepare or obtain from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets or Material Safety Data Sheets (MSDS) for each coating, mold release agent, resin, gel coat, catalyst, and solvent used in the following:
(1) One (1) coating touch-up booth, identified as TB1, and
(2) One (1) flat panel coating line, identified as FL1,

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

Particulate (PM) Monitoring for the new surface coating operations (TB1 and FL1) are as follows:

(a) Daily inspections shall be performed to verify the placement, integrity, and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the one (1) coating touch-up booth (TB1) stack

(TB1S) and the one (1) flat panel coating line (FL1) stacks (BCM1S, GCM1S, TCM1S, BCDOS, GCDOS, and TCDOS) while the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps.

(b) Monthly inspections shall be performed of the coating emissions from the stacks TB1S, BCM1S, GCM1S, TCM1S, BCDOS, GCDOS, and TCDOS and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in particulate matter emissions, or when evidence of particulate matter emission is observed, the Permittee shall take reasonable response steps.

Proposed Changes

The changes listed below have been made to Part 70 Operating Permit Renewal No.: T085-32217-00013. Deleted language appears as ~~strikethroughs~~ and new language appears in **bold**:

Modification No. 1 The new emission units have been added to the emission unit description sections of the permit (A.2, A.3, D.1, D.2, and E.2) as follows:

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

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

* * *

(m) One (1) coating touch-up booth, identified as TB1, approved in 2016 for construction, with a maximum capacity of 31 parts per hour, using 6 HVLP spray guns, using dry filters for particulate control, and exhausting to stack TB1S.

Under 40 CFR 63, Subpart PPPP, this is considered an affected facility.

(n) One (1) flat panel coating line, identified as FL1, consisting of three (3) robotic spray reciprocators (BCM1, GCM1, and TCM1) and three (3) drying ovens (BCDO, GCDO, and TCDO), approved in 2016 for construction, with a maximum capacity of 310 parts per hour (flat garage door panels), using dry filters for particulate control, and exhausting to stacks BCM1S, GCM1S, TCM1S, BCDOS, GCDOS, and TCDOS.

Under 40 CFR 63, Subpart PPPP, this is considered an affected facility.

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

This stationary source also includes the following insignificant activities:

* * *

(g) One (1) flat panel brush cleaner, Identified as FLPB1, approved in 2016 for construction, used to remove debris from flat panels before coating, using one (1) 1400 acfm baghouse (DC6) with an outlet grain loading of 0.001 gr/acfm for particulate control, and exhausting inside of the building.

(h) One (1) natural gas-fired, direct-fired, flat line air makeup unit for space heating, identified as FLAM1, approved for construction in 2016, with a maximum heat input capacity of 2.7 MMBtu/hour.

SECTION D.1~~FACILITY CONDITIONS~~ EMISSIONS UNIT OPERATION CONDITIONS

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

* * *

(m) One (1) coating touch-up booth, identified as TB1, approved in 2016 for construction, with a maximum capacity of 31 parts per hour, using 6 HVLP spray guns, using dry filters for particulate control, and exhausting to stack TB1S.

Under 40 CFR 63, Subpart PPPP, this is considered an affected facility.

(n) One (1) flat panel coating line, identified as FL1, consisting of three (3) robotic spray reciprocators (BCM1, GCM1, and TCM1) and three (3) drying ovens (BCDO, GCDO, and TCDO), approved in 2016 for construction, with a maximum capacity of 310 parts per hour (flat garage door panels), using dry filters for particulate control, and exhausting to stacks BCM1S, GCM1S, TCM1S, BCDOS, GCDOS, and TCDOS.

Under 40 CFR 63, Subpart PPPP, this is considered an affected facility.

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

SECTION D.2~~FACILITY CONDITIONS~~ **EMISSIONS UNIT OPERATION CONDITIONS**

~~Facility Description [326 IAC 2-7-5(14)]:~~ **Emissions Unit Description:** Insignificant Activities

* * *

(g) One (1) flat panel brush cleaner, Identified as FLPB1, approved in 2016 for construction, used to remove debris from flat panels before coating, using one (1) 1400 acfm baghouse (DC6) with an outlet grain loading of 0.001 gr/acfm for particulate control, and exhausting inside of the building.

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

SECTION E.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

* * *

(m) One (1) coating touch-up booth, identified as TB1, approved in 2016 for construction, with a maximum capacity of 31 parts per hour, using 6 HVLP spray guns, using dry filters for particulate control, and exhausting to stack TB1S.

Under 40 CFR 63, Subpart PPPP, this is considered an affected facility.

(n) One (1) flat panel coating line, identified as FL1, consisting of three (3) robotic spray reciprocators (BCM1, GCM1, and TCM1) and three (3) drying ovens (BCDO, GCDO, and TCDO), approved in 2016 for construction, with a maximum capacity of 310 parts per hour (flat garage door panels), using dry filters for particulate control, and exhausting to stacks BCM1S, GCM1S, TCM1S, BCDOS, GCDOS, and TCDOS.

Under 40 CFR 63, Subpart PPPP, this is considered an affected facility.

Insignificant Activity

(e) Four (4) natural gas-fired surface coating drying ovens, with no control, approved in 2015 for construction and described as follows:

ID	heat input (MMBtu/hr)	stack
DO1	0.76	DO1S
DO2	0.76	DO2S
DO3	0.97	DO3S
DO4	0.76	DO4S

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

Modification No. 2 The condition changes associated with the new units have been added to the permit as follows:

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

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

In order to render 326 IAC 2-2(PSD) not applicable, the total sum of VOC usage (from coatings, mold release agents, resins, gelcoats, catalysts coatings, dilution solvents, and cleaning solvents) at the following:

(a) surface coating booths (SB1- SB18 and SB30),
(b) gel coat application operations (RTMGC, RGR1, RGR2, RGR3, PCG1 and PGG2),
(c) Resin Transfer Molding Unit (RTM1),
(d) Mold Preparation Operation (RTMMP), ~~and~~
(e) portable chop guns (PCG2 and PGG3),
(f) Flat Panel Coating Line (FL1), and
(g) Coating Touchup Booth (TB1)

* * *

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

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

The amount of VOC delivered to the Flat Panel Coating Line (FL1) and the Coating Touchup Booth (TB1) shall collectively not exceed twenty-four and nine tenths (24.9) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with this limit shall limit total potential to emit of VOC to less than twenty five (25) tons per twelve (12) consecutive month period from TB1 and FL1 and shall render the requirements of 326 IAC 8-1-6 (New Facilities; General Reduction Requirements) not applicable to TB1 and FL1.

D.1.~~2~~**3** Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

* * *

D.1.~~3~~**4** Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d):

* * *

(d) Particulate from the surface coating booths identified as FL1 and TB1 shall be controlled by a dry particulate filter, waterwash, or an equivalent control device.

The Permittee shall operate the control devices in accordance with manufacturer's specifications.

D.1.~~4~~**5** Reinforced Plastic Composites Manufacturing [326 IAC 20-56-2]

* * *

D.1.~~5~~**6** Preventive Maintenance Plan [326 IAC 2-7-5(12)]

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

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

D.1.~~6~~**7** Volatile Organic Compounds (VOCs)

Compliance with the VOC usage limitation in Condition**s** D.1.1 **and D.1.2** shall be determined based upon the following criteria:

(a) Pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a), the Permittee shall prepare or obtain from the manufacturer the copies of the “as supplied” and “as applied” VOC data sheets or Material Safety Data Sheets (MSDS) for each coating, mold release agent, resin, gel coat, catalyst, and solvent used in the following:
(1) surface coating booths (SB1- SB18 and SB30);
(2) gel coat application operations (RTMGC, RGR1, RGR2, RGR3, PCG1 and PGG2);
(3) Resin Transfer Molding Unit (RTM1),
(4) Mold Preparation Operation (RTMMP), ~~and~~
(5) portable chop guns (PCG2 and PGG3),
(6) One (1) coating touch-up booth, identified as TB1, and
(7) One (1) flat panel coating line, identified as FL1,

* * *

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

D.1.~~7~~**8** Monitoring

(a) Daily inspections shall be performed to verify that the water level of the water pans meet the manufacturer's recommended level. To monitor the performance of the water pans, the water level of the pans shall be maintained weekly at a level where surface agitation indicates impact of the air flow. Water shall be kept free of solids and floating material that reduces the capture efficiency of the water pan. In addition, weekly observations shall be made of the overspray from the surface coating booths stacks (SBS1 through SBS18) while one or more of the booths are in operation. If a condition exists which should result in a response, the Permittee shall take a reasonable response. ~~Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response required by this condition. Failure to take a reasonable response shall be considered a deviation from this permit.~~

(b) Daily inspections shall be performed to verify the placement, integrity, and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stack (SBS30)**,** ~~and~~ FIT gel coat application booth (RTMGC-S), **and the one (1) coating touch-up booth (TB1)**

stack (TB1S) and the one (1) flat panel coating line (FL1) stacks (BCM1S, GCM1S, TCM1S, BCDOS, GCDOS, and TCDOS) while the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps. ~~Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.~~

(c) Monthly inspections shall be performed of the coating emissions from the stacks SBS30**,** ~~and~~ RTMGC-S**, TB1S, BCM1S, GCM1S, TCM1S, BCDOS, GCDOS, and TCDOS** and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in particulate matter emissions, or when evidence of particulate matter emission is observed, the Permittee shall take reasonable response steps. ~~Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.~~

Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response required by this condition. Failure to take a reasonable response shall be considered a deviation from this permit.

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

D.1.~~8~~**9** Record Keeping Requirement

(a) To document the compliance status with Condition**s** D.1.1 **and D.1.2**, the Permittee shall maintain the following records in accordance with (1) and (4) below. Records necessary to demonstrate compliance shall be available not later than thirty (30) days after the end of each compliance period.

* * *

(b) To document the compliance status with Condition D.1.~~4~~**5**, the Permittee shall maintain the following training records:

* * *

(c) To document the compliance status with Condition D.1.~~7~~**8**, the Permittee shall maintain a log of weekly overspray observations, weekly monitoring of the water level in the pans, daily and monthly inspections. The Permittee shall include in its daily record when a daily inspection is not performed and the reason for the lack of an inspection (e.g. the process did not operate that day).

* * *

D.1.~~9~~**10** Reporting Requirements

A quarterly summary of the information to document the compliance status with Condition**s** D.1.1 **and D.1.2** shall be submitted ~~to the address listed in Section C - General Reporting Requirements, of this permit,~~ using the reporting forms located at the end of this permit, or their equivalent, not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting Requirements contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(3~~4~~**5**).

* * *

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

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

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

(a) the ~~allowable~~ particulate **matter (PM)** emission**s** ~~rate~~ from the Urethane Machining (UM) facility shall not exceed 3.31 pounds per hour, when operating at a process weight rate of 1,452 pounds per hour.

(b) the ~~allowable~~ particulate **matter (PM)** emission**s** ~~rate~~ from the Woodworking Operations (WW) facility shall not exceed 1.62 pounds per hour, when operating at a process weight rate of 500 pounds per hour.

(c) the particulate matter (PM) emissions from the Flat Line Panel Brush Cleaner (FLPB1) shall not exceed 1.58 pounds per hour when operating at a process weight rate of 0.24 tons per hour.

The pounds per hour limitation**s** ~~was~~ **were** calculated with the following equation:

* * *

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

D.2.3 Particulate Control

(a) In order to **assure compliance** ~~comply~~ with Condition D.2.1, the five (5) baghouses (DC1, DC2, DC3, DC4, and DC5) for particulate control shall be in operation and control emissions from the Urethane Machining (UM)**,** and Woodworking Operations (WW) facilit~~y~~**ies** at all times the**se** facilit~~y~~**ies** ~~is~~ **are** in operation.

* * *

Modification No. 3 The following reporting form associated with new limitations has been added to the permit as follows:

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

Part 70 Quarterly Report

Source Name:	**J.P. Inc., d/b/a Jasper Plastic Solution**
Source Address:	**501 West Railroad Ave., Syracuse, Indiana 46567**
Part 70 Permit No.:	**T085-32217-00013**
Facility:	**Flat Panel Coating Line (FL1) and the Coating Touchup Booth (TB1)**
Parameter:	**VOC Emissions**
Limit:	**The total sum of VOC input (from coatings, catalysts coatings, dilution solvents, and cleaning solvents) at the surface coating Flat Panel Coating Line (FL1) and the Coating Touchup Booth (TB1) shall not exceed 24.9 tons per twelve (12) consecutive months period, with compliance determined at the end of each month.**

QUARTER: **YEAR:**

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

☐ **No deviation occurred in this quarter.**

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

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

Additional Changes

IDEM, OAQ made additional amendments 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.

OAQ Change No.: 1 IDEM added the rule citation 326 IAC 2-7-5(1) to the National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements subsection title in Sections E.1 to E.5 and revised these sections for clarity .

* * *Section E.1 ~~EMISSIONS UNIT OPERATION CONDITIONS~~**NESHAP**
* * *
National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements [~~40 CFR Part 63~~]**[326 IAC 2-7-5(1)]**
*** * ***

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

The Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart WWWW (included as Attachment A of ~~this~~ **the operating** permit), which are incorporated by reference as 326 IAC 20-56, for the facilities listed in Section E.1:

* * *

Section E.2 ~~EMISSIONS UNIT OPERATION CONDITIONS~~**NESHAP**

* * *

National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements ~~[40 CFR Part 63]~~**[326 IAC 2-7-5(1)]**

* * *

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

The Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart PPPP (included as Attachment B of ~~this~~ **the operating** permit), which are incorporated by reference as 326 IAC 20-81, for the facilities listed in Section E.2:

* * *

Section E.3 ~~EMISSIONS UNIT OPERATION CONDITIONS~~**NESHAP**

* * *

National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements ~~[40 CFR Part 63]~~**[326 IAC 2-7-5(1)]**

* * *

E.3.2 NESHAP for Wood Furniture Manufacturing Operations [40 CFR Part 63, Subpart JJ]

The Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart JJ (included as Attachment C of ~~this~~ **the operating** permit), for the facilities listed in Section E.3:

* * *

Section E.4 ~~EMISSIONS UNIT OPERATION CONDITIONS~~**NESHAP**

* * *

National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements ~~[40 CFR Part 63]~~**[326 IAC 2-7-5(1)]**

* * *

E.4.2 NESHAP for Stationary Reciprocating Internal Combustion Engines [326 IAC 20-82][40 CFR Part 63, Subpart ZZZZ]

The Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart ZZZZ (included as Attachment D of ~~this~~ **the operating** permit), which are incorporated by reference as 326 IAC 20-82, for the facilities listed in Section E.4:

* * *

Section E.5 ~~EMISSIONS UNIT OPERATION CONDITIONS~~**NESHAP**

* * *

National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements ~~[40 CFR Part 63]~~**[326 IAC 2-7-5(1)]**

* * *

E.5.2 NESHAP for Industrial, Commercial, and Institutional Boilers and Process Heaters [326 IAC 20-56][40 CFR Part 63, Subpart DDDDD]

The Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart DDDDD (included as Attachment E of ~~this~~ **the operating** permit), which are incorporated by reference as 326 IAC 20-95, for the facilities listed in Section E.5:

* * *

OAQ Change No.: 2 IDEM, OAQ has clarified the timeframe for notification on the Part 70 Operating Permit Emergency Occurrence Report as follows

PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT

* * *

□ This is an emergency as defined in 326 IAC 2-7-1(12)

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

* * *

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. 085-36655-00013 and Significant Permit Modification No.: 085-36657-00013. The staff recommend to the Commissioner that this Part 70 Significant Source and Significant Permit Modification be approved.

IDEM Contact

(a) Questions regarding this proposed permit can be directed to Angela Taylor 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) 234-5329 or toll free at 1-800-451-6027 extension 4-5329.

(b) A copy of the findings is available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/

(c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Permit Guide on the Internet at: http://www.in.gov/idem/5881.htm; and the Citizens' Guide to IDEM on the Internet at: http://www.in.gov/idem/6900.htm.

Appendix A: Emissions Calculations
Modification Summary
Company Name: J.P., Inc. d/b/a Jasper Plastics Solutions
Address City IN Zip: 501 West Railroad Ave., Syracuse, Indiana 46567
Part 70 Operating Permit T085-32217-00013
Significant Permit Modification: 085-36657-00013
Significant Source Modification: 085-36655-00013
Permit Reviewer: APT

Uncontrolled Potential to Emit Of the Modification (tons/yr)

Process	Unit ID	PM	PM_{10}	$PM_{2.5}$	SO_2	NO_x	VOC	CO	Total HAPs	Worst single HAP	
Flat Line Panel Brush	FLPB1	5.26	5.26	5.26	-	-	-	-	-	-	-
Flat Panel Coating Line	FL1	87.05	87.05	87.05	-	-	36.03	-	-	-	-
Coating Touchup Booth	TB1	3.18	3.18	3.18	-	-	1.45	-	-	-	-
Flat Line Air Makeup Unit	FLAM1	0.02	0.09	0.09	0.01	1.16	0.06	0.97	0.02	0.02	Hexane
Total		**95.51**	**95.57**	**95.57**	**0.01**	**1.16**	**37.54**	**0.97**	**0.02**	**0.02**	**Hexane**

Controlled / Limited Potential to Emit of the Modification (tons/yr)

Process	Unit ID	PM	PM_{10}	$PM_{2.5}$	SO_2	NO_x	VOC[1]	CO	Total HAPs	Worst single HAP	
Flat Line Panel Brush	FLPB1[2]	0.05	0.05	0.05	-	-	-	-	-	-	-
Flat Panel Coating Line	FL1[3]	4.35	4.35	4.35	-	-	24.90	-	-	-	-
Coating Touchup Booth	TB1[3]	0.16	0.16	0.16	-	-		-	-	-	-
Flat Line Air Makeup Unit	FLAM1	0.02	0.09	0.09	0.01	1.16	0.06	0.97	0.02	0.02	Hexane
Total		**4.59**	**4.65**	**4.65**	**0.01**	**1.16**	**24.96**	**0.97**	**0.02**	**0.02**	**Hexane**

1 Enforceable Limit for Surface Coating Operations
2 Cartridge Filter System
3 Low Temperature Dry Fabric Filters

Appendix A: Emissions Calculations
Panel Brush for Flat Line Coating System (FLPB1)

Company Name: J.P., Inc. d/b/a Jasper Plastics Solutions
Address City IN Zip: 501 West Railroad Ave., Syracuse, Indiana 46567
Part 70 Operating Permit T085-32217-00013
Significant Permit Modification: 085-36657-00013
Significant Source Modification: 085-36655-00013
Permit Reviewer: APT

Process	Baghouse	Airflow (acfm)	Outlet grain loading rate (gr/acfm)	Airflow-to-cloth ratio (acfm/ft²)	Total filter area (ft²)	Control efficiency	Controlled PTE of PM (lb/hr)	Controlled PTE of PM (tons/yr)	Uncontrolled PTE of PM (lb/hr)	Uncontrolled PTE of PM (tons/yr)
FLPB1	DC6	1,400	0.001	2.5	570.00	99.0%	0.01	0.05	1.20	5.26
									Total:	**5.26**

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

Methodology:
Airflow to cloth ratio (acfm/ft^2) = Airflow (acfm) / Total filter area (ft^2)
Controlled PTE of PM (lb/hr) = Outlet grain loading rate (gr/acfm) * 1 lb/7000 acfm * Airflow-to-cloth ratio (acfm/ft^2) * Total filter area (ft^2) * 60 min/hr
Uncontrolled PTE of PM (lb/hr) = Controlled PTE of PM (lb/hr) * (1/(1 - Control efficiency))
PTE of PM (ton/yr) = PTE of PM (lb/hr) * 8760 hrs/yr * 1 ton/2000 lbs

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Baghouses	Maximum throughput (lb/hr)	Process weight rate (ton/hr)	Allowable emissions (lb/hr)
DC6	480	0.24	1.58

Methodology:
Process weight rate (ton/hr) = Maximum throughput (lb/hr) * 1 ton/2000 lbs
Allowable emission (lb/hr) = 4.10 * Process weight rate (ton/hr)$^{0.67}$, pursuant to 326 IAC 6-3-2(e)

Appendix A: Emissions Calculations
Surface Coating Operations - Flat Panel Coating Line (FL1)

Company Name: J.P., Inc. d/b/a Jasper Plastics Solutions
Address City IN Zip: 501 West Railroad Ave., Syracuse, Indiana 46567
Part 70 Operating Permit T085-32217-00013
Significant Permit Modification: 085-36657-00013
Significant Source Modification: 085-36655-00013
Permit Reviewer: APT

Material	Density (lb/gal)	Weight % Volatile (Water & Organics)	Weight % Water & Exempt VOC	Weight % VOC	Volume % Water	Volume % Solids	Usage rate (gal/unit)	Maximum throughput (unit/hr)	Maximum usage (gal/day)	VOC content (lb/gal coating)	VOC content (lb/gal coating less water)	VOC content (lb/gal coating solids)	PTE of VOC (lb/hr)	PTE of VOC (lb/day)	PTE of VOC (ton/yr)	PTE of PM (ton/yr)	Transfer Efficiency
Basecoat Coating Machine (BCM1)																	
M64BPN20139-4311 Basecoat	8.95	64.00%	60.10%	3.90%	64.60%	30.80%	0.028600	310.00	212.78	0.35	0.99	1.13	3.10	74.28	13.56	31.29	75%
n-Butyl Acetate (Cleanup)	7.31	100.00%	0.00%	100.00%	0.00%	0.00%	0.000029	310.00	0.22	7.31	7.31	N/A	0.07	1.58	0.29	0.00	100%
												Subtotal:	**3.17**	**75.86**	**13.85**	**31.29**	
Glaze Coating Machine (GCM1)																	
S66WXN20040-4311-1402 Glaze	8.56	76.90%	75.10%	1.80%	77.30%	20.90%	0.035800	310.00	266.35	0.15	0.68	0.74	1.71	41.04	7.49	24.03	75%
n-Butyl Acetate (Cleanup)	7.31	100.00%	0.00%	100.00%	0.00%	0.00%	0.000036	310.00	0.27	7.31	7.31	N/A	0.09	1.96	0.36	0.00	100%
												Subtotal:	**1.80**	**43.00**	**7.85**	**24.03**	
Topcoat Coating Machine (TCM1)																	
F63TL505 Topcoat	8.86	63.00%	59.40%	3.60%	64.70%	31.20%	0.023800	310.00	177.07	0.32	0.90	1.02	2.36	56.48	10.31	26.49	75%
V66VL6 Catalyst	9.10	15.20%	0.00%	15.20%	0.00%	80.60%	0.002000	310.00	14.88	1.38	1.38	1.72	0.86	20.59	3.76	5.24	75%
n-Butyl Acetate (Cleanup)	7.31	100.00%	0.00%	100.00%	0.00%	0.00%	0.000026	310.00	0.19	7.31	7.31	N/A	0.06	1.42	0.26	0.00	100%
												Subtotal:	**3.28**	**78.49**	**14.33**	**31.73**	
												Total PTE for All Coatings (Before Controls):	**8.25**	**197.35**	**36.03**	**87.05**	
												Control Efficiency:	**0.00%**	**0.00%**	**0.00%**	**95.00%**	
												Total PTE for All Coatings (After Controls):	**8.25**	**197.35**	**36.03**	**4.35**	

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

Transfer Efficiency = conservatively set at 75% for Robotic Spray Machines (controlled spray reciprocator coating flat panels - garage doors) and 100% for Manual Cleanup Operations.

Methodology:
Weight % VOC = Weight % Volatile (Water & Organics) - Weight % Water & Exempt VOC
Maximum usage (gal/day) = Usage rate (gal/unit) * Maximum throughput (unit/hr) * 24 hrs/day
VOC content (lb/gal coating) = Density (lb/gal) * Weight % VOC
VOC content (lb/gal coating less coating) = Density (lb/gal) * Weight % VOC / (1-Volume % Water)
VOC content (lb/gal coating solids) = Density (lb/gal) * Weight % VOC / Volume % Solids
PTE of VOC (lb/hr) = VOC content (lb/gal coating) * Usage rate (gal/unit) * Maximum throughput (unit/hr)
PTE of VOC (lb/day) = VOC content (lb/gal coating) * Usage rate (gal/unit) * Maximum throughput (unit/hr) * 24 hrs/day
PTE of VOC (ton/yr) = VOC content (lb/gal coating) * Usage rate (gal/unit) * Maximum throughput (unit/hr) * 8760 hrs/yr * 1 ton/2000 lbs
PTE of PM (ton/yr) = Usage rate (gal/unit) * Maximum throughput (unit/hr) * Density (lb/gal)* (1-Weight % volatile) * (1-Transfer efficiency) * 8760 hrs/yr * 1 ton/2000 lbs
Materials used do not contain hazardous air pollutants (HAP)

Appendix A: Emissions Calculations
Surface Coating Operations - Coating Touchup Booth (TB1)

Company Name: J.P., Inc. d/b/a Jasper Plastics Solutions
Address City IN Zip: 501 West Railroad Ave., Syracuse, Indiana 46567
Part 70 Operating Permit T085-32217-00013
Significant Permit Modification: 085-36657-00013
Significant Source Modification: 085-36655-00013
Permit Reviewer: APT

Material	Density (lb/gal)	Weight % Volatile (Water & Organics)	Weight % Water & Exempt VOC	Weight % VOC	Volume % Water	Volume % Solids	Usage rate (gal/unit)	Maximum throughput (unit/hr)	Maximum usage (gal/day)	VOC content (lb/gal coating)	VOC content (lb/gal coating less water)	VOC content (lb/gal coating solids)	PTE of VOC (lb/hr)	PTE of VOC (lb/day)	PTE of VOC (ton/yr)	PTE of PM (ton/yr)	Transfer Efficiency
Basecoat Application																	
M64BPN20139-4311 Basecoat	8.95	64.00%	60.10%	3.90%	64.60%	30.80%	0.028600	31.00	21.28	0.35	0.99	1.13	0.31	7.43	1.36	3.13	75%
n-Butyl Acetate (Cleanup)	7.31	100.00%	0.00%	100.00%	0.00%	0.00%	0.000029	31.00	0.02	7.31	7.31	N/A	0.01	0.16	0.03	0.00	100%
												Subtotal:	**0.32**	**7.59**	**1.39**	**3.13**	
Glaze Application																	
S66WXN20040-4311-1402 Glaze	8.56	76.90%	75.10%	1.80%	77.30%	20.90%	0.035800	31.00	26.64	0.15	0.68	0.74	0.18	4.11	0.75	2.41	75%
n-Butyl Acetate (Cleanup)	7.31	100.00%	0.00%	100.00%	0.00%	0.00%	0.000036	31.00	0.03	7.31	7.31	N/A	0.01	0.20	0.04	0.00	100%
												Subtotal:	**0.19**	**4.31**	**0.79**	**2.41**	
Topcoat Application																	
F63TL505 Topcoat	8.86	63.00%	59.40%	3.60%	64.70%	31.20%	0.023800	31.00	17.71	0.32	0.90	1.02	0.24	5.65	1.04	2.65	75%
V66VL6 Catalyst	9.10	15.20%	0.00%	15.20%	0.00%	80.60%	0.002000	31.00	1.49	1.38	1.38	1.72	0.09	2.06	0.38	0.53	75%
n-Butyl Acetate (Cleanup)	7.31	100.00%	0.00%	100.00%	0.00%	0.00%	0.000026	31.00	0.02	7.31	7.31	N/A	0.01	0.15	0.03	0.00	100%
												Subtotal:	**0.34**	**7.86**	**1.45**	**3.18**	
												Total Worst Case Coating (Before Controls):	**0.34**	**7.86**	**1.45**	**3.18**	
												Control Efficiency:	**0.00%**	**0.00%**	**0.00%**	**95.00%**	
												Total Worst Case Coating (After Controls):	**0.34**	**7.86**	**1.45**	**0.16**	

Notes:
$PM = PM_{10} = PM_{2.5}$
Transfer Efficiency = 75% for High Volume Low Pressure (HVLP) and 100% for Manual Cleanup Operations
Coatings are Mutually Exclusive

Methodology:
Weight % VOC = Weight % Volatile (Water & Organics) - Weight % Water & Exempt VOC
Maximum usage (gal/day) = Usage rate (gal/unit) * Maximum throughput (unit/hr) * 24 hrs/day
VOC content (lb/gal coating) = Density (lb/gal) * Weight % VOC
VOC content (lb/gal coating less coating) = Density (lb/gal) * Weight % VOC / (1-Volume % Water)
VOC content (lb/gal coating solids) = Density (lb/gal) * Weight % VOC / Volume % Solids
PTE of VOC (lb/hr) = VOC content (lb/gal coating) * Usage rate (gal/unit) * Maximum throughput (unit/hr)
PTE of VOC (lb/day) = VOC content (lb/gal coating) * Usage rate (gal/unit) * Maximum throughput (unit/hr) * 24 hrs/day
PTE of VOC (ton/yr) = VOC content (lb/gal coating) * Usage rate (gal/unit) * Maximum throughput (unit/hr) * 8760 hrs/yr * 1 ton/2000 lbs
PTE of PM (ton/yr) = Usage rate (gal/unit) * Maximum throughput (unit/hr) * Density (lb/gal)* (1-Weight % volatile) * (1-Transfer efficiency) * 8760 hrs/yr * 1 ton/2000 lbs
Materials used do not contain hazardous air pollutants (HAP)

Appendix A: Emission Calculations
Air Makeup Unit for Flat Line (FLAM1)

Company Name: J.P., Inc. d/b/a Jasper Plastics Solutions
Address City IN Zip: 501 West Railroad Ave., Syracuse, Indiana 46567
Part 70 Operating Permit T085-32217-00013
Significant Permit Modification: 085-36657-00013
Significant Source Modification: 085-36655-00013
Permit Reviewer: APT

Heat Input Capacity MMBtu/hr	mmBtu / mmscf	Potential Throughput MMCF/yr
2.70	1,020.00	23.19

	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.90	7.60	7.60	0.60	100.00 **see below	5.50	84.00
Potential Emission in tons/yr	0.02	0.09	0.09	0.01	1.16	0.06	0.97

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
PM2.5 emission factor is filterable and condensable PM2.5 combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology
All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03
Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

HAPS Calculations

	HAPs - Organics					
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	**Total - Organics**
Emission Factor in lb/MMcf	2.10E-03	1.20E-03	0.08	1.80	3.40E-03	
Potential Emission in tons/yr	2.43E-05	1.39E-05	8.70E-04	2.09E-02	3.94E-05	0.02

	HAPs - Metals					
	Lead	Cadmium	Chromium	Manganese	Nickel	**Total - Metals**
Emission Factor in lb/MMcf	5.00E-04	1.10E-03	1.40E-03	3.80E-04	2.10E-03	
Potential Emission in tons/yr	5.80E-06	1.28E-05	1.62E-05	4.41E-06	2.43E-05	6.35E-05

Total HAPs	**0.02**
Worst HAP	**0.02**

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

Methodology
Emission Factors are from AP 42, Table 1.4-2 SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03.
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Appendix A: Emissions Calculations
New Source-wide PTE Summary

Company Name: J.P., Inc. d/b/a Jasper Plastics Solutions
Address City IN Zip: 501 West Railroad Ave., Syracuse, Indiana 46567
Part 70 Operating Permit T085-32217-00013
Significant Permit Modification: 085-36657-00013
Significant Source Modification: 085-36655-00013
Permit Reviewer: APT

Unlimited potential to emit (tons/yr)

Process	Unit ID	PM	PM_{10}	$PM_{2.5}$	SO_2	NO_x	VOC	CO	Total HAPs	Worst single HAP	
Surface Coating Booths	SB1 through SB18	16.78	16.78	16.78	-	-	164.78	-	14.27	8.92	Toluene
Surface Coating Booth	SB30	4.42	4.42	4.42	-	-	0.53	-	-	-	-
Urethane Machining	UM	45.05	45.05	45.05	-	-	-	-	-	-	-
Woodworking	WW	0.23	0.23	0.23	-	-	-	-	-	-	-
Polyurethane Machining	P1 through P6	-	-	-	-	-	0.19	-	0.097	0.097	MDI
R&D Polyurethane Machining	P7	-	-	-	-	-	0.004	-	0.002	0.002	MDI
Storage Tanks	PT1, PT2, PT3, IT1, IT2	-	-	-	-	-	0.0007	-	0.00001	0.00001	MDI
Emergency Generator	Natural Gas Em Generator	0.000001	0.000127	0.000127	0.000007	0.052020	0.001505	0.004042	0.0009	0.0007	Formaldehyde
Resin Transfer Molding	RTM1	0.00	0.00	0.00	-	-	4.89	-	3.99	3.73	Styrene
FIT Gel Coating Application Booth	RTMGC	1.14	1.14	1.14	-	-	4.78	-	3.76	3.76	Styrene
Mold Preparation Operation	RTMMP Solvent	-	-	PTE	-	-	3.96	-	-	-	-
Recipocator and Portable FIT Gel Coat Application	RGR1, RGR2, RGR3, and PGG1	0.00	0.00	0.00	-	-	102.52	-	102.52	102.52	Styrene
Reciprocator and Portable FIT Gel Coat Application	RGR1, RGR2, RGR3, and PGG1 solvent	-	-	-	-	-	24.53	-	-	-	-
Portable FIT Gel Coat Application	PCG1 and PGG2	0.00	0.00	0.00	-	-	6.70	-	6.70	6.70	Styrene
Portable FIT Gel Coat Application	PCG1 and PGG2 solvent	-	-	-	-	-	11.44	-	-	-	-
Hand Grinding	Grinders HGR1-10	18.77	18.77	18.77	-	-	-	-	-	-	-
portable chop gun	PCG2	-	-	-	-	-	10.12	-	2.23	2.23	Styrene
portable chop gun	PGG3	-	-	-	-	-	7.46	-	3.91	3.91	Styrene
plastic part flow coating operation	AO	-	-	-	-	-	1.37	-	1.37	1.29	MDI
Bulk Tank	BT2	-	-	-	-	-	0.02	-	0.02	0.02	Styrene
Space Heaters	OH1, AM1-AM8	0.05	0.20	0.20	0.02	2.68	0.15	2.25	0.05	0.05	Hexane
ovens	DO1-DO4	0.03	0.11	0.11	0.01	1.49	0.08	1.25	0.03	0.03	Hexane
Water Jet Cutter *	WJ1	negl.	negl.	negl.	negl.	negl.	negl.	negl.	negl.	negl.	-
Flat Line Panel Brush	FLPB1	5.26	5.26	5.26	-	-	-	-	-	-	-
Flat Panel Coating Line	FL1	87.05	87.05	87.05	-	-	36.03	-	-	-	-
Coating Touchup Booth	TB1	3.18	3.18	3.18	-	-	1.45	-	-	-	-
Flat Line Air Makeup Unit	FLAM1	0.02	0.09	0.09	0.01	1.16	0.06	0.97	0.02	0.02	Hexane
Total		**181.98**	**182.28**	**182.28**	**0.03**	**5.38**	**381.08**	**4.48**	**138.98**	**122.88**	**Styrene**

negl. = negligible

* Water material is used for the jet cutter, therefore, emissions are assumed to be negligible.

Appendix A: Emissions Calculations
PTE after Issuance - Summary

Company Name: J.P., Inc. d/b/a Jasper Plastics Solutions
Address City IN Zip: 501 West Railroad Ave., Syracuse, Indiana 46567
Part 70 Operating Permit T085-32217-00013
Significant Permit Modification: 085-36657-00013
Significant Source Modification: 085-36655-00013
Permit Reviewer: APT

Limited potential to emit (tons/yr)

Process	Unit ID	PM	PM_{10}	$PM_{2.5}$	SO_2	NO_x	VOC	CO	Total HAPs	Worst single HAP	
Surface Coating Booths	SB1 through SB18	16.78	16.78	16.78	-	-		-	14.27	8.92	Toluene
Surface Coating Booth	SB30	4.42	4.42	4.42	-	-		-	-	-	-
Recipocator and Portable FIT Gel Coat Application	RGR1, RGR2, RGR3, and PGG1	0.00	0.00	0.00	-	-		-	102.52	102.52	Styrene
Reciprocator and Portable FIT Gel Coat Application	RGR1, RGR2, RGR3, and PGG1 solvent	-	-	-	-	-		-	-	-	-
Portable FIT Gel Coat Application	PCG1 and PGG2	0.00	0.00	0.00	-	-		-	6.70	6.70	Styrene
Portable FIT Gel Coat Application	PCG1 and PGG2 solvent	-	-	-	-	-		-	-	-	-
Resin Transfer Molding	RTM1	0.00	0.00	0.00	-	-	245.00	-	3.99	3.73	Styrene
FIT Gel Coating Application Booth	RTMGC	1.14	1.14	1.14	-	-		-	3.76	3.76	Styrene
Mold Preparation Operation	RTMMP Solvent	-	-	-	-	-		-	-	-	-
portable chop gun	PCG2	-	-	-	-	-		-	2.23	2.23	Styrene
portable chop gun	PGG3	-	-	-	-	-		-	3.91	3.91	Styrene
**Flat Panel Coating Line	FL1	4.35	4.35	4.35	-	-		-	-	-	-
**Coating Touchup Booth	TB1	0.16	0.16	0.16	-	-		-	-	-	-
Urethane Machining	UM	45.05	45.05	45.05	-	-	-	-	-	-	-
Woodworking	WW	0.23	0.23	0.23	-	-	-	-	-	-	-
Hand Grinding	Grinders HGR1-10	18.77	18.77	18.77	-	-	-	-	-	-	-
Polyurethane Machining	P1 through P6	-	-	-	-	-	0.194	-	0.097	0.097	MDI
R&D Polyurethane Machining	P7	-	-	-	-	-	0.004	-	0.002	0.002	MDI
Storage Tanks	PT1, PT2, PT3, IT1, IT2	-	-	-	-	-	0.0007	-	0.00001	0.00001	MDI
Emergency Generator	Natural Gas Em Generator	0.000001	0.000127	0.000127	0.000007	0.052020	0.001505	0.004042	0.000911	0.000673	Formaldehyde
plastic part flow coating operation	AO	-	-	-	-	-	1.37	-	1.37	1.29	MDI
Bulk Tank	BT2	-	-	-	-	-	0.02	-	0.02	0.02	Styrene
Space Heaters	OH1, AM1-AM8	0.05	0.20	0.20	0.02	2.68	0.15	2.25	0.05	0.05	Hexane
ovens	DO1-DO4	0.03	0.11	0.11	0.01	1.49	0.08	1.25	0.03	0.03	Hexane
Water Jet Cutter *	WJ1	negl.	negl.	negl.	negl.	negl.	negl.	negl.	negl.	-	negl.
Flat Line Panel Brush	FLPB1	5.26	5.26	5.26	-	-	-	-	-	-	-
Flat Line Air Makeup Unit	FLAM1	0.02	0.09	0.09	0.01	1.16	0.06	0.97	0.02	0.02	Hexane
Total		**96.26**	**96.57**	**96.57**	**0.03**	**5.38**	**246.89**	**4.48**	**138.98**	**133.29**	**Styrene**

**These units are also limited below 25 tpy for 326 IAC 8-1-6 avoidence

Appendix A: Emissions Calculations
Reinforced Plastics and Composites
Open Molding Operations*
Resin and Gel Usage (PCG2 and PGG3)

Company Name: J.P., Inc. d/b/a Jasper Plastics Solutions
Address City IN Zip: 501 West Railroad Ave., Syracuse, Indiana 46567
Part 70 Operating Permit T085-32217-00013
Significant Permit Modification: 085-36657-00013
Significant Source Modification: 085-36655-00013
Permit Reviewer: APT

Emission Unit ID	Material (Resin or Gel Name)	Density (Lb/Gal)	Weight % Monomer	Gal of Mat. (gal/unit)	Maximum usage (unit/hour)	UEF (lbs monomer/ton resin or gel)	Potential VOC/HAP (pounds per day)	Potential VOC/HAP (tons per year)	Transfer Efficiency**	Potential PM (tons/ year)
PCG2	COR61-AA-270S - Styrene	9.51	28.00%	0.55	3.000	60	11.30	2.06	100%	0.00
	COR61-AA-270S - a-Methyl Styrene	9.51	2.00%	0.55	3.000	5	0.94	0.17	100%	0.00
PGG3	Oxford White Gelcoat - Styrene	11.08	30.00%	0.22	3.000	169.36	14.86	2.71	100%	0.00
	Oxford White Gelcoat - MMA	11.08	5.00%	0.22	3.000	75	6.58	1.20	NA	
				Total VOC/HAP and PM from Resin and Gel Use**				**6.15**		**0.00**

* Open Molding Operations include the following: manual application, mechanical application, gel coat application, and filament application.
** Transfer efficiency is 100% for non-atomized FIT applicator.

METHODOLOGY
Acetone as cleanup solvent
Assume all of the monomer is styrene.
Emission factors based on the type of application from "Unified Emission Factors for Open Molding of Composites," Composites Fabricators Association (October 2009) to
Potential VOC (lb/day) for resins or gels = Density (lb material /gal material) * Gal. of material (gal material/unit) * Maximum usage (unit/hr) * UEF (lb styrene/ton material) *
Potential VOC (ton/year) = Potential VOC (lb/day) * 365 days/year * (1 ton/2000 lb)
Potential PM (ton/year) = Density * (1 - Weight % monomer or VOC) * Gal. of Material * Maximum Usage * (1 - transfer efficiency) * 24 hrs/day * 365 days/year * (1

Process	Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of solvent less water	Pounds VOC per gallon of solvent	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year
PCG2	MEKP - Catalyst[1]	8.3	74.00%	2.0%	72.0%	2.0%	0.00%	0.10000	3.000	6.13	6.00	1.80	43.23	7.89
PGG3	MEKP - Catalyst[1]	8.3	74.00%	2.0%	72.0%	2.0%	0.00%	0.04500	3.000	6.13	6.00	0.81	19.46	3.55
	Potential Emissions			**Add worst case coating to all solvents**								**2.61**	**62.69**	**11.44**

[1)] MEKP catalyst solution Cadox L-50A: 2,2,4-Trimethyl-1,3-pentanediol diisobutyrate, 70% max; MEK, 2% max; water, 2% max.

METHODOLOGY
Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used

Appendix A: Emissions Calculations
Surface Coating - Assembly Operations (AO)

Company Name: J.P., Inc. d/b/a Jasper Plastics Solutions
Address City IN Zip: 501 West Railroad Ave., Syracuse, Indiana 46567
Part 70 Operating Permit T085-32217-00013
Significant Permit Modification: 085-36657-00013
Significant Source Modification: 085-36655-00013
Permit Reviewer: APT

Material	Density (lb/gal)	Weight % Volatile (Water & Organics)	Weight % Water & Exempt VOC	Weight % VOC	Volume % Water	Volume % Solids	Usage rate (gal/unit)	Maximum throughput (unit/hr)	Maximum usage (gal/day)	VOC content (lb/gal coating)	VOC content (lb/gal coating less water)	VOC content (lb/gal coating solids)	PTE of VOC (lb/hr)	PTE of VOC (lb/day)	PTE of VOC (ton/yr)	PTE of PM (ton/yr)	Transfer Efficiency
Plastic Surface Coating (Adhesive Application)																	
SG315A Adhesive	8.42	4.96%	0.00%	4.96%	0.00%	94.47%	0.25	3.00	18.00	0.42	0.42	N/A	0.31	7.52	1.37	0.00	100%
												Totals:	**0.31**	**7.52**	**1.37**	**0.00**	

Notes:
Transfer Efficiency = 100% for Flow Coating
PM = PM_{10} = $PM_{2.5}$

Methodology:
Weight % VOC = Weight % Volatile (Water & Organics) - Weight % Water & Exempt VOC
Maximum usage (gal/day) = Usage rate (gal/unit) * Maximum throughput (unit/hr) * 24 hrs/day
VOC content (lb/gal coating) = Density (lb/gal) * Weight % VOC
VOC content (lb/gal coating less coating) = Density (lb/gal) * Weight % VOC / (1-Volume % Water)
VOC content (lb/gal coating solids) = Density (lb/gal) * Weight % VOC / Volume % Solids
PTE of VOC (lb/hr) = VOC content (lb/gal coating) * Usage rate (gal/unit) * Maximum throughput (unit/hr)
PTE of VOC (lb/day) = VOC content (lb/gal coating) * Usage rate (gal/unit) * Maximum throughput (unit/hr) * 24 hrs/day
PTE of VOC (ton/yr) = VOC content (lb/gal coating) * Usage rate (gal/unit) * Maximum throughput (unit/hr) * 8760 hrs/yr * 1 ton/2000 lbs
PTE of PM (ton/yr) = Usage rate (gal/unit) * Maximum throughput (unit/hr) * Density (lb/gal)* (1-Weight % volatile) * (1-Transfer efficiency) * 8760 hrs/yr * 1 ton/2000 lbs

HAPs

Material	Methyl Methacrylate		Styrene		PTE of Total HAPs
	Weight %	PTE (tons/yr)	Weight %	PTE (tons/yr)	
Plastic Surface Coating (Adhesive Application)					
SG315A Adhesive	4.67%	1.29	0.29%	0.08	1.37
	Totals:	**1.29**		**0.08**	**1.37**

Note:
Material is a reactive adhesive with a VOC content of 50 grams per liter per the MSDS. The VOC content is comprised of styrene and methyl methacrylate (HAP).

Methodology:
Weight % HAP = MSDS Weight % VOC x [Weight % Component / Total Weight % VOC or HAP]
PTE of HAP (ton/yr) = Density (lb/gal) * Usage rate (gal/unit) * Maximum throughput (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Paint System Drying Ovens

Company Name: J.P., Inc. d/b/a Jasper Plastics Solutions
Address City IN Zip: 501 West Railroad Ave., Syracuse, Indiana 46567
Part 70 Operating Permit T085-32217-00013
Significant Permit Modification: 085-36657-00013
Significant Source Modification: 085-36655-00013
Permit Reviewer: APT

Unit Type	Number of Units	Heat Input Capacity (MMBtu/hr) per Unit	Total Capacity (MMBtu/hr)
Drying Oven (DO1, DO2)	2	0.76	1.52
Drying Oven (DO3, DO4)	2	0.97	1.94
		Total	**3.46**

Heat Input Capacity	HHV	Potential Throughput
MMBtu/hr	mmBtu / mmscf	MMCF/yr
3.46	1020	29.7

	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	0.03	0.11	0.11	0.01	1.49	0.08	1.25

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
PM2.5 emission factor is filterable and condensable PM2.5 combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 B
MMCF = 1,000,000 Cubic Feet of Gas
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03
Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

HAPS Calculations

	HAPs - Organics					
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	**Total - Organics**
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	
Potential Emission in tons/yr	3.1E-05	1.8E-05	1.1E-03	0.03	5.1E-05	**0.03**

	HAPs - Metals					
	Lead	Cadmium	Chromium	Manganese	Nickel	**Total - Metals**
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/yr	7.4E-06	1.6E-05	2.1E-05	5.6E-06	3.1E-05	**8.1E-05**
					Total HAPs	**0.03**
Methodology is the same as above.					**Worst HAP**	**0.03**

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

Greenhouse Gas Calculations

	Greenhouse Gas		
	CO2	CH4	N2O
Emission Factor in lb/MMcf	120,000	2.3	2.2
Potential Emission in tons/yr	1,783	0.0	0.0
Summed Potential Emissions in tons/yr	1,783		
CO2e Total in tons/yr	1,794		

Methodology
The N2O Emission Factor for uncontrolled is 2.2. The N2O Emission Factor for low Nox burner is 0.64.
Emission Factors are from AP 42, Table 1.4-2 SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03.
Global Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (21) + N2O Potential

Appendix A: Emission Calculations
PM/PM10 Emissions
Hand grinders HGR1 - HGR10

Company Name: J.P., Inc. d/b/a Jasper Plastics Solutions
Address City IN Zip: 501 West Railroad Ave., Syracuse, Indiana 46567
Part 70 Operating Permit T085-32217-00013
Significant Permit Modification: 085-36657-00013
Significant Source Modification: 085-36655-00013
Permit Reviewer: APT

1. Process Description:

Max. Process Rate:	136.78	lbs/hr
PM Control Equipment:	Enclosure with Dry Filters Exhausting Inside Building	
Grain Loading:	0.0015	grains/acf
Air Flow Rate:	5000	acf/m
Control Efficiency:	98.5%	

1. Potential to Emit After Control:

Hourly PM/PM10 Emissions	=(outlet grain loading gr/dscf)*(air flow dscf/cfm)*(60 min/hr)/(7000 gr/lb)	**0.064**	**lbs/hr**
Annual PM/PM10 emissions	=(hourly PM emissions lb/hr)*(8760 hr/yr)*(1 ton/2000 lbs)	**0.282**	**tons/yr**

2. Potential Uncontrolled Emissions:

Hourly PM/PM10 emissions	=(controlled emission rate lb/hr)/(1-control efficiency)	**4.29**	**lbs/hr**
Annual PM/PM10 emissions	=(controlled hourly emissions lb/hr)*(8760 hr/yr)*(1 ton/2000 lbs)	**18.77**	**tons/yr**

Appendix A: Emission Calculations
PM/PM10 Emissions
One (1) Robotic Water Jet Cutter (WJ1)

Company Name: J.P., Inc. d/b/a Jasper Plastics Solutions
Address City IN Zip: 501 West Railroad Ave., Syracuse, Indiana 46567
Part 70 Operating Permit T085-32217-00013
Significant Permit Modification: 085-36657-00013
Significant Source Modification: 085-36655-00013
Permit Reviewer: APT

1. Process Description:

Max. Process Rate:	1390.79	lbs/hr	
PM Control Equipment:	Water Jet Cutting, Particulate Matter Entrained in Cutting Stream and Integral to the Equipment Operation		
Grain Loading:	0	grains/acf	
Air Flow Rate:	5000	acf/m	Enclosure with Dry Filters Exhausting Inside Building
Control Efficiency:	98.5%		

1. Potential to Emit After Control:

Hourly PM/PM10 Emissions	=(outlet grain loading gr/dscf)*(air flow dscf/cfm)*(60 min/hr)/(7000 gr/lb)	**0.0 lbs/hr**
Annual PM/PM10 emissions	=(hourly PM emissions lb/hr)*(8760 hr/yr)*(1 ton/2000 lbs)	**0.0 tons/yr**

2. Potential Uncontrolled Emissions:

Hourly PM/PM10 emissions	=(controlled emission rate lb/hr)/(1-control efficiency)	**0.0 lbs/hr**
Annual PM/PM10 emissions	=(controlled hourly emissions lb/hr)*(8760 hr/yr)*(1 ton/2000 lbs)	**0.0 tons/yr**

Bulk Tank BT2

Emission Unit ID	Material (Resin or Gel Name)	Potential VOC (tons/year)	Potential HAP - Styrene (tons/year)
BT2	Polyester Resin w/Styrene	0.02	0.02
Potential to Emit		**0.02**	**0.02**

METHODOLOGY
Tanks 4.0.9d Report Attached

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

Company Name: J.P., Inc. d/b/a Jasper Plastics Solutions
Address City IN Zip: 501 West Railroad Ave., Syracuse, Indiana 46567
Part 70 Operating Permit T085-32217-00013
Significant Permit Modification: 085-36657-00013
Significant Source Modification: 085-36655-00013
Permit Reviewer: APT

Unit Type	Number of Units	Heat Input Capacity (MMBtu/hr) per Unit	Total Capacity (MMBtu/hr)
Furnace	1	0.25	0.25
Air Make Up Units	8	0.75	6.00
		Total	**6.25**

Heat Input Capacity MMBtu/hr	HHV mmBtu / mmscf	Potential Throughput MMCF/yr
6.25	1020	53.7

	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	0.05	0.20	0.20	0.02	2.68	0.15	2.25

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
PM2.5 emission factor is filterable and condensable PM2.5 combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 B
MMCF = 1,000,000 Cubic Feet of Gas
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03
Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

HAPS Calculations

	HAPs - Organics					
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	**Total - Organics**
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	
Potential Emission in tons/yr	5.6E-05	3.2E-05	2.0E-03	0.05	9.1E-05	**0.05**

	HAPs - Metals					
	Lead	Cadmium	Chromium	Manganese	Nickel	**Total - Metals**
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/yr	1.3E-05	3.0E-05	3.8E-05	1.0E-05	5.6E-05	**1.5E-04**
					Total HAPs	**0.05**
Methodology is the same as above.					**Worst HAP**	**0.05**

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

Greenhouse Gas Calculations

	Greenhouse Gas		
	CO2	CH4	N2O
Emission Factor in lb/MMcf	120,000	2.3	2.2
Potential Emission in tons/yr	3,221	0.1	0.1
Summed Potential Emissions in tons/yr	3,221		
CO2e Total in tons/yr	3,240		

Methodology
The N2O Emission Factor for uncontrolled is 2.2. The N2O Emission Factor for low Nox burner is 0.64.
Emission Factors are from AP 42, Table 1.4-2 SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03.
Global Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (21) + N2O Potential

Appendix A: Emissions Calculations
Surface Coating Operations (SB1 to SB18)

Company Name: J.P., Inc. d/b/a Jasper Plastics Solutions
Address City IN Zip: 501 West Railroad Ave., Syracuse, Indiana 46567
Part 70 Operating Permit T085-32217-00013
Significant Permit Modification: 085-36657-00013
Significant Source Modification: 085-36655-00013
Permit Reviewer: APT

Material	Density (lb/gal)	Weight % Volatile (Water & Organics)	Weight % Water & Exempt VOC	Weight % VOC	Volume % Water	Volume % Solids	Usage rate (gal/unit)	Maximum throughput (unit/hr)	Maximum usage (gal/day)	VOC content (lb/gal coating)	VOC content (lb/gal coating less water)	VOC content (lb/gal coating solids)	PTE of VOC (lb/hr)	PTE of VOC (lb/day)	PTE of VOC (ton/yr)	PTE of PM (ton/yr)	Transfer Efficiency
Plastic Surface Coating (Mold Release)																	
Mold Cleaner CX-500	7.01	100.00%	0.00%	100.00%	0.00%	0.00%	0.0028	8.06	0.54	7.01	7.01	N/A	0.16	3.79	0.69	0.00	100%
Mold Release Black	7.81	77.80%	0.90%	76.90%	1.10%	13.60%	0.0069	8.06	1.33	6.01	6.07	44.16	0.33	8.01	1.46	0.00	100%
												Total:	**0.49**	**11.81**	**2.15**	**0.00**	
Wood Surface Coating																	
American Oak	8.32	69.90%	1.00%	68.90%	1.20%	15.10%	0.0422	8.06	8.16	5.73	5.80	37.96	1.95	46.77	8.54	0.93	75%
Butyl Acetate (Cleanup)	7.31	100.00%	0.00%	100.00%	0.00%	0.00%	0.0024	8.06	0.46	7.31	7.31	N/A	0.14	3.39	0.62	0.00	100%
												Total:	**2.09**	**50.16**	**9.15**	**0.93**	
Plastic Surface Coating																	
Reducer R7K305	7.25	100.00%	0.00%	100.00%	0.00%	0.00%	0.0029	8.06	0.56	7.25	7.25	N/A	0.17	4.06	0.74	0.00	100%
Precat Lacquer 24252	7.83	77.70%	0.00%	77.70%	0.00%	13.87%	0.0058	8.06	1.12	6.08	6.08	43.86	0.28	6.82	1.25	0.09	75%
Urethane Catalyst 4970	8.87	25.00%	0.00%	25.00%	0.00%	69.48%	0.0042	8.06	0.81	2.22	2.22	3.19	0.08	1.80	0.33	0.25	75%
Butyl Acetate (Cleanup)	7.31	100.00%	0.00%	100.00%	0.00%	0.00%	0.0024	8.06	0.46	7.31	7.31	N/A	0.14	3.39	0.62	0.00	100%
												Totals:	**0.67**	**16.08**	**2.93**	**0.34**	
												Worst-case Coating:	**2.09**	**50.16**	**9.15**	**0.93**	
												Total for all 18 booth:	**37.62**	**902.90**	**164.78**	**16.78**	

Notes:
Although these calculations are the same as was previously calculated for 29 paint booths, the source states that these throughputs and usage rates actually represent the maximum potential of the 18 paints booths.
The spray booths use three different coatings, each of which is mutually exclusive. Therefore, the worst case of these coatings is used to calculate potential to emit.
Wood Surface Coating is the worst-case operation for VOC and PM
$PM = PM_{10} = PM_{2.5}$

Methodology:
Weight % VOC = Weight % Volatile (Water & Organics) - Weight % Water & Exempt VOC
Maximum throughput (unit/hr) = 145 total units/hr / 18 booths
Maximum usage (gal/day) = Usage rate (gal/unit) * Maximum throughput (unit/hr) * 24 hrs/day
VOC content (lb/gal coating) = Density (lb/gal) * Weight % VOC
VOC content (lb/gal coating less coating) = Density (lb/gal) * Weight % VOC / (1-Volume % Water)
VOC content (lb/gal coating solids) = Density (lb/gal) * Weight % VOC / Volume % Solids
PTE of VOC (lb/hr) = VOC content (lb/gal coating) * Usage rate (gal/unit) * Maximum throughput (unit/hr)
PTE of VOC (lb/day) = VOC content (lb/gal coating) * Usage rate (gal/unit) * Maximum throughput (unit/hr) * 24 hrs/day
PTE of VOC (ton/yr) = VOC content (lb/gal coating) * Usage rate (gal/unit) * Maximum throughput (unit/hr) * 8760 hrs/yr * 1 ton/2000 lbs
PTE of PM (ton/yr) = Usage rate (gal/unit) * Maximum throughput (unit/hr) * Density (lb/gal)* (1-Weight % volatile) * (1-Transfer efficiency) * 8760 hrs/yr * 1 ton/2000 lbs

HAPs

Material	Ethyl Benzene		Formaldehyde		MIBK		Toluene		Xylene		PTE of Total HAPs (ton/year)
	Weight %	PTE (tons/yr)	Weight %	PTE (tons/yr)	Weight %	PTE (tons/yr)	Weight %	PTE (tons/yr)	Weight %	PTE (tons/yr)	
Plastic Surface Coating (Mold Release)											
Mold Cleaner CX-500	-	-	-	-	-	-	30.00%	0.208	30.00%	0.208	
Mold Release Black	0.90%	0.017	-	-	-	-	6.00%	0.114	5.00%	0.095	
Totals:		**0.017**		**-**		**-**		**0.322**		**0.303**	**0.642**
Wood Surface Coating											
American Oak	0.40%	0.050	-	-	-	-	4.00%	0.496	2.00%	0.248	
Butyl Acetate (Cleanup)	-	-	-	-	-	-	-	-	-	-	
Totals:		**0.050**		**-**		**-**		**0.496**		**0.248**	**0.793**
Plastic Surface Coating											
Reducer R7K305	-	-	-	-	-	-	20.00%	0.148	-	-	
Precat Lacquer 24252	1.05%	0.017	0.12%	0.002	6.80%	0.109	5.71%	0.091	4.44%	0.071	
Urethane Catalyst 4970	2.38%	0.031	-	-	-	-	-	-	10.00%	0.131	
Butyl Acetate (Cleanup)	-	-	-	-	-	-	-	-	-	-	
Totals:		**0.048**		**0.002**		**0.109**		**0.240**		**0.203**	**0.601**
Worst-case Coating:		**0.050**		**0.002**		**0.109**		**0.496**		**0.303**	**0.793**
Total for all 18 booth:		**0.892**		**0.035**		**1.961**		**8.919**		**5.451**	**14.271**

Note:
Wood Surface Coating is the worst-case operation for HAPs.

Methodology:
PTE of HAP (ton/yr) = Density (lb/gal) * Usage rate (gal/unit) * Maximum throughput (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs
MIBK = Methyl isobutyl ketone

Appendix A: Emissions Calculations
Surface Coating Operations (SB30)

Company Name: J.P., Inc. d/b/a Jasper Plastics Solutions
Address City IN Zip: 501 West Railroad Ave., Syracuse, Indiana 46567
Part 70 Operating Permit T085-32217-00013
Significant Permit Modification: 085-36657-00013
Significant Source Modification: 085-36655-00013
Permit Reviewer: APT

Material	Density (lb/gal)	Weight % Volatile (Water & Organics)	Weight % Water & Exempt VOC	Weight % VOC	Volume % Water	Volume % Solids	Usage rate (gal/unit)	Maximum throughput (unit/hr)	Maximum usage (gal/day)	VOC content (lb/gal coating)	VOC content (lb/gal coating less water)	VOC content (lb/gal coating solids)	PTE of VOC (lb/hr)	PTE of VOC (lb/day)	PTE of VOC (ton/yr)	PTE of PM (ton/yr)	Transfer Efficiency
Pure White E60WJ0520	12.80	36.90%	35.00%	1.90%	53.72%	0.00%	0.0400	12.50	12.00	0.24	0.53	N/A	0.12	2.92	0.53	4.42	75%
Water	8.34	100.00%	100.00%	0.00%	0.00%	69.48%	0.0250	12.50	7.50	-	-	-	-	-	-	-	75%
												Total:	**0.12**	**2.92**	**0.53**	**4.42**	

Notes:
Although these calculations we not included in the First Title V Renewal (T085-32217-00013), this is not a new unit and was constructed in 2008 (Adminstrative Amendment #085-30738-00013)
This coating does not contain any HAPs
PM = PM_{10} = $PM_{2.5}$

Methodology:
Weight % VOC = Weight % Volatile (Water & Organics) - Weight % Water & Exempt VOC
Maximum usage (gal/day) = Usage rate (gal/unit) * Maximum throughput (unit/hr) * 24 hrs/day
VOC content (lb/gal coating) = Density (lb/gal) * Weight % VOC
VOC content (lb/gal coating less coating) = Density (lb/gal) * Weight % VOC / (1-Volume % Water)
PTE of VOC (lb/hr) = VOC content (lb/gal coating) * Usage rate (gal/unit) * Maximum throughput (unit/hr)
PTE of VOC (lb/day) = VOC content (lb/gal coating) * Usage rate (gal/unit) * Maximum throughput (unit/hr) * 24 hrs/day
PTE of VOC (ton/yr) = VOC content (lb/gal coating) * Usage rate (gal/unit) * Maximum throughput (unit/hr) * 8760 hrs/yr * 1 ton/2000 lbs
PTE of PM (ton/yr) = Usage rate (gal/unit) * Maximum throughput (unit/hr) * Density (lb/gal)* (1-Weight % volatile) * (1-Transfer efficiency) * 8760 hrs/yr * 1 ton/2000 lbs

Appendix A: Emissions Calculations
Urethane Machining Operation (UM)

Company Name: J.P., Inc. d/b/a Jasper Plastics Solutions
Address City IN Zip: 501 West Railroad Ave., Syracuse, Indiana 46567
Part 70 Operating Permit T085-32217-00013
Significant Permit Modification: 085-36657-00013
Significant Source Modification: 085-36655-00013
Permit Reviewer: APT

Process	Baghouse	Airflow (acfm)	Outlet grain loading rate (gr/acfm)	Airflow-to-cloth ratio (acfm/ft²)	Total filter area (ft²)	Control efficiency	Controlled PTE of PM (lb/hr)	Controlled PTE of PM (tons/yr)	Uncontrolled PTE of PM (lb/hr)	Uncontrolled PTE of PM (tons/yr)
Urethane Machining	DC1	4,000	0.001	10.1	398.00	99.0%	0.03	0.15	3.43	15.02
	DC2	4,000	0.001	10.1	398.00	99.0%	0.03	0.15	3.43	15.02
	DC3	4,000	0.001	10.1	398.00	99.0%	0.03	0.15	3.43	15.02
									Total:	**45.05**

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

Methodology:
Airflow to cloth ratio (acfm/ft^2) = Airflow (acfm) / Total filter area (ft^2)
Controlled PTE of PM (lb/hr) = Outlet grain loading rate (gr/acfm) * 1 lb/7000 acfm * Airflow-to-cloth ratio (acfm/ft^2) * Total filter area (ft^2) * 60 min/hr
Uncontrolled PTE of PM (lb/hr) = Controlled PTE of PM (lb/hr) * (1/(1 - Control efficiency))
PTE of PM (ton/yr) = PTE of PM (lb/hr) * 8760 hrs/yr * 1 ton/2000 lbs

326 IAC 6-3-2 Compliance

Baghouses	Maximum throughput (lb/hr)	Process weight rate (ton/hr)	Allowable emissions (lb/hr)
DC1, DC2, DC3	1,452	0.73	3.31

Methodology:
Process weight rate (ton/hr) = Maximum throughput (lb/hr) * 1 ton/2000 lbs
Allowable emission (lb/hr) = 4.10 * Process weight rate (ton/hr)$^{0.67}$, pursuant to 326 IAC 6-3-2(e)

Appendix A: Emissions Calculations
Woodworking Operation (WW)

Company Name: J.P., Inc. d/b/a Jasper Plastics Solutions
Address City IN Zip: 501 West Railroad Ave., Syracuse, Indiana 46567
Part 70 Operating Permit T085-32217-00013
Significant Permit Modification: 085-36657-00013
Significant Source Modification: 085-36655-00013
Permit Reviewer: APT

Process	Baghouse	Airflow (acfm)	Outlet grain loading rate (gr/acfm)	Airflow-to-cloth ratio (acfm/ft²)	Total filter area (ft²)	Control efficiency	Controlled PTE of PM (lb/hr)	Controlled PTE of PM (tons/yr)	Uncontrolled PTE of PM (lb/hr)	Uncontrolled PTE of PM (tons/yr)
Woodworking	DC4	3,000	0.001	1.5	2,032.00	99.0%	0.03	0.11	2.57	11.26
	DC5	3,000	0.001	1.5	2,032.00	99.0%	0.03	0.11	2.57	11.26
							Totals:	**0.23**		**22.53**

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

Methodology:
Airflow to cloth ratio (acfm/ft^2) = Airflow (acfm) / Total filter area (ft^2)
Controlled PTE of PM (lb/yr) = Outlet grain loading rate (gr/acfm) * 1 lb/7000 acfm * Airflow-to-cloth ratio (acfm/ft^2) * Total filter area (ft^2) * 60 min/hr
Uncontrolled PTE of PM (lb/hr) = Controlled PTE of PM (lb/hr) * (1/(1 - Control efficiency))
PTE of PM (ton/yr) = PTE of PM (lb/hr) * 8760 hrs/yr * 1 ton/2000 lbs

326 IAC 6-3-2 Compliance

Baghouse	Maximum throughput (lb/hr)	Process weight rate (ton/hr)	Allowable emissions (lb/hr)
DC4, DC5	500	0.25	1.62

Methodology:
Process weight rate (ton/hr) = Maximum throughput (lb/hr) * 1 ton/2000 lbs
Allowable emission (lb/hr) = 4.10 * Process weight rate (ton/hr)$^{0.67}$, pursuant to 326 IAC 6-3-2(e)

Appendix A: Emissions Calculations
Polyurethane Molding

Company Name: J.P., Inc. d/b/a Jasper Plastics Solutions
Address City IN Zip: 501 West Railroad Ave., Syracuse, Indiana 46567
Part 70 Operating Permit T085-32217-00013
Significant Permit Modification: 085-36657-00013
Significant Source Modification: 085-36655-00013
Permit Reviewer: APT

Units	Material	u (m/s)*	A_{spill} (ft^2)*	VP_{MDI} (mm Hg)	T_{spill} (K)*	MW	K_{MDI}	QR (lb/min)	PTE of VOC (lb/hr)	PTE of VOC (lb/day)	PTE of VOC (ton/yr)	PTE of HAPs (MDI) (tons/yr)
P1 through P6	CE 151 Isocyanate	0.508	73079.97	1.89E-05	303	250.26	1	0.000369	0.022	0.532	0.097	0.097
	Pluracol Polyol**	-	-	-	-	-	-	-	0.022	0.532	0.097	-
										Total:	**0.194**	**0.097**
P7	CE 151 Isocyanate	0.508	1545.3	1.89E-05	303	250.26	1	0.000008	0.0005	0.011	0.002	0.002
	Pluracol Polyol**	-	-	-	-	-	-	-	0.0005	0.011	0.002	-
										Total:	**0.004**	**0.002**

Notes:
*Information provided by source
Potential emissions based on MDI loss from spill of 100% MDI on a given day, with surface area equal to the daily surface area to be coated, and with the polyurethane reaction complete after 24 hours.
Source: American Chemistry Council - Center for the Polyurethane Industry. MDI Emissions Reporting Guidelines for the Polyurethane Industry. May 2012. Pgs. 4-14 to 4-15.
MDI = methylene diphenyl diisocyanate (a HAP and VOC)
Polyurethanes result from the reaction between alcohols with two or more reactive hydroxyl groups per molecule (diols or polyols) and isocyanates that have more than one reactive isocyanate group per molecule (a diisocyanate or polyisocyanate).
Reference: G. Woods, The ICI polyurethanes book, 2nd edition, Chichester - New York, ICI Polyurethanes and John Wiley & Sons, 1990, 362 pp.
**The polyurethane molding operation at Jasper Plastics Solutions will involve reacting MDI (CE 151 Isocynate) with Pluracol Polyol (a proprietary polyol manufactured by BASF) at a 1:1 ratio by weight.
Given that the polyurethane reaction occurs on a 1:1 ratio, the amount of polyol emitted can be estimated as equal to the amount of MDI emitted.
The R&D molding machine (P7) uses Elasotopor Polyol instead of Pluracol Polyol.
Pluracol/Elastopor Polyol is mainly comprised of 1, 6-Hexanediol (a non-HAP VOC), with negligible amounts of other compounds used as vapor suppressors for stabilization.

Methodology:
Q_R (lb/min) = (0.284/82.05) * $u^{0.78}$ * A_{spill} * (VP_{MDI}/T_{spill}) * $(MW)^{2/3}$ * K_{MDI}
Where:
Q_R = Evaporation rate (lb/min)
u = Air flow speed in the vicinity of the process (m/s)
A_{spill} = Area of spilled material (ft^2) (Units P1 though P6)
VP_{MDI} = MDI Vapor Pressure at spill temperature (mm Hg)
T_{spill} = Average evaporation temperature (K)
MW = The molecular weight of MDI
K_{MDI} = Vapor pressure adjustment (default is 1 for 100% MDI)
PTE of VOC (lb/hr) = QR (lb/min) * 60 min/hr
PTE of VOC (lb/day) = PTE of VOC (lb/hr) * 24 hrs/day
PTE of VOC (ton/yr) = PTE of VOC (lb/hr) * 8760 hrs/yr * 1 ton/2000 lbs

Appendix A: Emissions Calculations
Storage Tanks

Company Name: J.P., Inc. d/b/a Jasper Plastics Solutions
Address City IN Zip: 501 West Railroad Ave., Syracuse, Indiana 46567
Part 70 Operating Permit T085-32217-00013
Significant Permit Modification: 085-36657-00013
Significant Source Modification: 085-36655-00013
Permit Reviewer: APT

Tanks	Total annual product throughput (gal/yr)	Number of tanks	Annual product throughput per tank (gal/yr/tank)	Diameter (ft) (D)	Vapor space outage (ft) (H_{VO})	Tank volume (gal)	Turnovers per year (N)	Daily average liquid temperature (°R) (T_{LA})	Daily vapor temperature range(°R) (ΔT_V)
PT1, PT2, PT3	705,667	3	235,222	10	8.5	5000	47.04	545.4	18
IT1, IT2	614,217	2	307,108	10	8.5	5000	61.42	545.4	18

Standing storage (breathing) loss per tank (AP-42 Section 7.1.3.1.1)

Tanks	V_V	W_V	K_E	K_S	L_S	PTE of VOC per tank (ton/yr)
PT1, PT2, PT3	667.6	1.41E-05	0.0324	1.00	0.112	5.58E-05
IT1, IT2	667.6	3.79E-07	0.0324	1.00	0.003	1.50E-06

Working loss per tank (AP-42 Section 7.1.3.1.2)

Tanks	M_V	P_{VA}	Q	K_N	K_P	L_W	PTE of VOC per tank (ton/yr)
PT1, PT2, PT3	118.17	0.0007	5,600.6	0.80	1	0.37	1.86E-04
IT1, IT2	250.00	0.0000089	7,312.2	0.66	1	0.01	5.31E-06

Total losses

Tank	Total PTE of VOC (ton/yr)	Total PTE of MDI (ton/yr)
PT1	2.42E-04	-
PT2	2.42E-04	-
PT3	2.42E-04	-
IT1	6.81E-06	6.81E-06
IT2	6.81E-06	6.81E-06
Total:	**7.40E-04**	**1.36E-05**

Notes:
These calculations are based on data from Appendix A to the TSD for Part 70 Permit Renewal (T085-32217-00013).
Equations are from AP-42, Fifth Edition Chapter 7.1 (Liquid Storage Tanks) for Fixed Roof Tanks (Section 7.1.3.1)
Tanks PT1, PT2, and PT3 stores Polyol and IT1 and IT2 store Isocyanate
VOC emissions from IT1 and IT2 are MDI (HAPs)

Methodology:
Annual product throughput per tank (gal/yr/tank) = Total annual product throughput (gal/yr) / Number of tanks
Turnovers per year = Annual product throughput per tank (gal/yr/tank) / Tank volume (gal)
Daily average liquid temperature (°R) = Average evaporation temperature (K) (previous page) * 9/5

$L_S = 365 * V_V * W_V * K_E * K_S$

Where:

L_S = Standing storage (breathing) loss (lb/yr/tank)
V_V = Vapor space volume (ft^3) = $((\pi/4) * D^2) * H_{VO}$
W_V = Stock vapor density (lb/ft^3) = $(M_V * P_{VA}) / (10.731 * T_{LA})$
K_E = Vapor space expansion factor = $0.0018 * \Delta T_V$
K_S = Vented vapor saturation factor = $1 / (1+(0.053 * P_{VA} * H_{VO}))$

$L_W = 0.0010 * M_V * P_{VA} * Q * K_N * K_P$

Where:

L_w = Working Losses (lb/yr/tank)
M_V = Vapor molecular weight (Mv)
P_{VA} = Vapor pressure at daily average liquid surface temperature (psia)
Q = Annual net throughput (bbl/yr/tank) = Annual throughput (gal/yr/tank) * 0.02381 bbl/gal
K_N = Working loss turnover (saturation) factor = (180+N) / 6 * N, when N>36
K_P = Working loss product factor = 1, for organic liquids other than crude oil

PTE of VOC per tank (ton/yr) = Standing storage loss (L_s) or working loss (L_w) (lb/year/yr) * 1 ton/2000 lbs
Total PTE of VOC/MDI (ton/yr) = Standing storage loss PTE + Working loss PTE

Appendix A: Emission Calculations
Natural Gas Emergency Generator

Company Name: J.P., Inc. d/b/a Jasper Plastics Solutions
Address City IN Zip: 501 West Railroad Ave., Syracuse, Indiana 46567
Part 70 Operating Permit T085-32217-00013
Significant Permit Modification: 085-36657-00013
Significant Source Modification: 085-36655-00013
Permit Reviewer: APT

Maximum Heat Input Capacity (MMBtu/hr)	0.05
Maximum Hours Operated per Year (hr/yr)	500
Potential Fuel Usage (MMBtu/yr)	25.5
High Heat Value (MMBtu/MMscf)	1020
Potential Fuel Usage (MMcf/yr)	0.03

	Pollutant						
Criteria Pollutants	PM*	PM_{10}*	$PM_{2.5}$*	SO_2	NO_x	VOC	CO
Emission Factor (lb/MMBtu)	7.71E-05	9.99E-03	9.99E-03	5.88E-04	4.08E+00	1.18E-01	3.17E-01
Potential Emissions (tons/yr)	9.83E-07	1.27E-04	1.27E-04	7.50E-06	5.20E-02	1.50E-03	4.04E-03

*PM emission factor is filterable PM only. PM_{10} emission factor is filterable and condensable PM_{10} combined. $PM_{2.5}$ emission factor is filterable and condensable $PM_{2.5}$ combined.

	HAPs - Organics					
Hazardous Air Pollutants (HAPs)	Acetaldehyde	Acrolein	Benzene	Biphenyl	1,3-Butadiene	Formaldehyde
Emission Factor (lb/MMBtu)	8.36E-03	5.14E-03	4.40E-04	2.12E-04	2.67E-04	5.28E-02
Potential Emissions (tons/yr)	1.07E-04	6.55E-05	5.61E-06	2.70E-06	3.40E-06	6.73E-04

	HAPs - Organics				
	Methanol	Hexane	Toluene	2,2,4-Trimethylpentane	Xylene
Emission Factor (lb/MMBtu)	2.50E-03	1.10E-03	4.08E-04	2.50E-04	1.84E-04
Potential Emissions (tons/yr)	3.19E-05	1.40E-05	5.20E-06	3.19E-06	2.35E-06
				Total HAPs:	**9.113E-04**

**PAH = Polyaromatic Hydrocarbon (PAHs are considered HAPs, since they are considered Polycyclic Organic Matter)

Notes:
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas
Emission Factors are from AP-42 (Supplement F, July 2000), Table 3.2-2
HAP pollutants consist of the nine highest HAPs included in AP-42 Table 3.2-2.

Methodology
Potential Fuel Usage (MMBtu/yr) = Maximum Output Horsepower Rating (hp) * Brake Specific Fuel Consumption (Btu/hp-hr) * Maximum Hours Operated per Year (hr/yr) / 1000000 Btu/MMBtu
Potential Fuel Usage (MMCF/yr) = Potential Fuel Usage (MMBtu/yr) / High Heat Value (MMBtu/MMCF)
Potential Emissions (tons/yr) = Potential Fuel Usage (MMBtu/yr) * Emission Factor (lb/MMBtu) / 2000 lb/ton

Appendix A: Emission Calculations
VOC and PM/PM_{10} Emission Calculations
One (1) Resin Transfer Molding (Closed Molding) Operation (RTM1)

Company Name: J.P., Inc. d/b/a Jasper Plastics Solutions
Address City IN Zip: 501 West Railroad Ave., Syracuse, Indiana 46567
Part 70 Operating Permit T085-32217-00013
Significant Permit Modification: 085-36657-00013
Significant Source Modification: 085-36655-00013
Permit Reviewer: APT

Unit	Application Method	Material	Density (lbs/gal)	Weight % VOC	Max. Production Rate (unit/hr)	Max coating Usage (gal/unit)	Max Usage (lbs/hr)	VOC Emission Factor (lbs/ton)[2]	PTE of VOC (lbs/hour)	PTE of VOC (lbs/day)	PTE of VOC before Controls (ton/yr)	PTE of PM/PM10 before Controls (lbs/hr)[3]	PTE of PM/PM10 before Controls (tons/yr)[3]	Transfer Efficiency[4]
RTM1	Resin Transfer Molding	Production Resin	8.60	54.92%	2.50	3.00	64.50	32.95	1.06	25.50	4.65	0.00	0.00	100.00%
RTM1	Resin Transfer Molding	MEKP[1]	8.34	72.00%	2.50	0.12	2.50	43.20	0.05	1.30	0.24	0.00	0.00	100.00%
Total									**1.12**	**26.80**	**4.89**		**0.00**	

[1)] MEKP catalyst solution Cadox L-50A: 2,2,4-Trimethyl-1,3-pentanediol diisobutyrate, 70% max; MEK, 2% max; water, 2% max.
[2)] The emission factors for resin are the sum of the weight percentages for styrene, MMA, divinyl benzene, epoxidized 2-ethylhexyl tallate, dimethyl methanephosphonate, and dimethylaniline (DMA) multiplied by 2,000 (lbs/ton) and by the emission factor for closed molding operations (3%) from AP-42 Section 4.4, 5th Edition (January 1995).
Emission factor for MEKP = 2,000 *Wt% VOC in MEKP.
[3)] Assume all the PM emissions equal PM10 emissions.
[4)] The transfer efficiency is based upon resin transfer injection molding.
Emission Factors for Marble Casting and Closed Molding are 3% for NVS and 2% for VS.
NVS = nonvapor-suppressed
VS = vapor-suppressed

METHODOLOGY

Max. usage (lbs/hr = Max. Production Rate (unit/hr) *Max. Coating Usage (gal/unit) * Density (lbs/gal)
PTE of VOC (lbs/hr) = Max. Usage (lbs/hr) * 1 ton/2000 lbs * emission Factor (lbs/ton)
PTE of VOC (lbs/day) = Max. Usage (lbs/hr) * 1 ton/2000 lbs * emission Factor (lbs/ton) * 24 hr/day
PTE of VOC before controls (tons/yr) = Max. Usage (lbs/hr) * 1 ton/2000 lbs * emission Factor (lbs/ton) * 8760 hr/yr * 1 ton/ 2000 lbs
PTE of PM/PM10 before Controls (lbs/hr) = Max Usage (lbs/hr) * (1-Weight % VOC) * (1-Transfer Efficiency)
PTE of PM/PM10 before Controls (tons/yr) = Max Usage (lbs/hr) * (1-Weight % VOC) * (1-Transfer Efficiency) * 8760 hrs/yr * (1ton/2000lbs)

Unit	Application Method	Material	Density (lbs/gal)	Max Production Rate (unit/hr)	Max. Coating Usage (gal/unit)	Maximum Usage (lbs/hr)
RTM1	Resin Transfer Molding	Production Resin	8.60	2.50	3.00	64.50

Weight % Styrene	Emission Styrene (lbs/ton)[1]	PTE Styrene (tons/yr)	Weight % MMA	Emission MMA (lbs/ton)[1]	PTE MMA (tons/yr)	Weight % DMA	Emission DMA (lbs/ton)[1]	PTE DMA (tons/yr)	Total HAPs (tons/yr)
44.01%	26.41	3.73	2.51%	1.51	0.21	0.50%	0.30	0.04	3.99
Total PTE (tons/yr)		**3.73**			**0.21**			**0.04**	**3.99**

[1] The emission factors for resin are the weight percentages for styrene, MMA, and DMA multiplied by 2,000 and by the AP-42 Emission Factor of 3% for Closed Molding Operations. Emission Factors from AP-42 Section 4.4, 5th Edition (January 1995).

METHODOLOGY

Potential to Emit HAPs (tons/yr) = Max. Usage (lbs/hr) 8760 hr/yr * 1 ton/2000 lbs * Emission Factor (lb/ton) * 1 ton/2000 lb

Appendix A: Emissions Calculations
Reinforced Plastics and Composites
Open Molding Operations[1]
Gel Coat Application
One (1) Gel Coat Application Booth Using Fluid Impingement Technology (FIT) Application (RTMGC)

Company Name: J.P., Inc. d/b/a Jasper Plastics Solutions
Address City IN Zip: 501 West Railroad Ave., Syracuse, Indiana 46567
Part 70 Operating Permit T085-32217-00013
Significant Permit Modification: 085-36657-00013
Significant Source Modification: 085-36655-00013
Permit Reviewer: APT

Emission Unit ID	Material (Resin or Gel Name)	Density (lb/gal)	Weight % Monomer/ VOC	Gal of Mat. (gal/unit)	Maximum usage (unit/hour)	UEF Emission Factor (lb/ton)	Maximum Usage (lb/hr)	Potential VOC/HAP (lb/hr)	Potential VOC/HAP (lb/day)	Potential VOC/HAP (tons/year)	Transfer Efficiency	Potential PM (tons/ year)
RTMGC	Sandable Gray 5779E90254	10.71	35.00%	0.30	2.50	214	8.03	0.86	20.63	3.76	95%	1.14
RTMGC	MEKP-catalyst[2]	8.34	74.00%	0.015	2.50	1480	0.31	0.23	5.55	1.01	100%	NA
							Total VOC and PM from Gel Coat Use Before Control	**1.09**	**26.18**	**4.78**		**1.14**
							Total VOC and PM from Gel Coat Use After Control	**1.09**	**26.18**	**4.78**		**0.06**
							Dry Filter Contol Efficiency 95.00%					
							HAP Emissions as Styrene	**0.86**	**20.63**	**3.76**		

[1] Open Molding Operations include the following: manual application, mechanical application, gel coat application, and filament application.

[2] MEKP catalyst solution Cadox L-50A: 2,2,4-Trimethyl-1,3-pentanediol diisobutyrate, 70% max; MEK, 2% max; water, 2% max.

METHODOLOGY
Acetone as cleanup solvent
VOC Emission factor for MEKP = 2,000 *Wt% VOC in MEKP.
PM/PM10 Emissions for MEKP = Zero
HAP Emissions = VOC Emissions from the application of gel coat excluding MEKP
Transfer Efficiency = 95% for fluid impingement technology application of gel coat
Dry Filter Control Efficiency = Standard industry average
Emission factors based on the type of application from "Unified Emission Factors for Open Molding of Composites," Composites Fabricators Association (October 2009) to calculate resin and gelcoat emissions.

Max. Usage (lbs/hr) = Max. Production Rate (unit/hr) *Max. Coating Usage (gal/unit) * Density (lbs/gal)
PTE of VOC (lbs/hr) = Max. Usage (lbs/hr) * 1 ton/2000 lbs * emission Factor (lbs/ton)
Potential VOC (lb/day) = Potential VOC (lb/hr) * 24 (hr/day)
Potential VOC (ton/year) = Potential VOC (lb/day) * 365 days/year * (1 ton/2000 lb)
Potential PM (ton/year)= Density * (1-Weight % monomer or VOC)*Gal. of Material * Maximum Usage*(1-transfer efficiency) * 24 hrs/day * 365 days/year * (1 ton/2000 lb)

Appendix A: Emissions Calculations
VOC and Particulate Emissions
from Surface Coating Operations - RTM Mold Preparation and Cleanup Operations (RTMMP)

Company Name: J.P., Inc. d/b/a Jasper Plastics Solutions
Address City IN Zip: 501 West Railroad Ave., Syracuse, Indiana 46567
Part 70 Operating Permit T085-32217-00013
Significant Permit Modification: 085-36657-00013
Significant Source Modification: 085-36655-00013
Permit Reviewer: APT

Material	Unit	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency*
TR-900 Mold Release	RTMMP	7.30	99.00%	0.00%	99.00%	0.00%	1.50%	0.05	2.50	7.23	7.23	0.90	21.68	3.96	0.00	481.80	100.00%
Potential Emissions												**0.90**	**21.68**	**3.96**	**0.00**		

METHODOLOGY

*Transfer Efficiency is 100% for Hand Applied Materials.
Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
This portion of the process does not use hazardous air pollutants. Acetone is used for clean-up.

Appendix A: Emissions Calculations
Reinforced Plastics and Composites
Open Molding Operations*
Resin and Gel Usage (RGR1, RGR2, RGR3, and PGG1)

Company Name: J.P., Inc. d/b/a Jasper Plastics Solutions
Address City IN Zip: 501 West Railroad Ave., Syracuse, Indiana 46567
Part 70 Operating Permit T085-32217-00013
Significant Permit Modification: 085-36657-00013
Significant Source Modification: 085-36655-00013
Permit Reviewer: APT

Emission Unit ID	Material (Resin or Gel Name)	Density (Lb/Gal)	Weight % Monomer	Gal of Mat. (gal/unit)	Maximum usage (unit/hour)	UEF (lbs monomer/ton resin or gel)	Potential VOC/HAP (pounds/day)	Potential VOC/HAP (tons/year)	Transfer Efficiency	Potential PM (tons/ year)
RGR1**	AOC C979-GCD-20 - Styrene	9.2	35.00%	11.00	1.000	77	93.31	17.03	100%	0.00
	Oxford White Gelcoat - Styrene	11.7	30.00%	4.32	1.000	169.36	102.98	18.79	100%	0.00
	Oxford White Gelcoat - MMA	11.7	5.00%	4.32	1.000	75	45.61	8.32	NA	
RGR2**	AOC C979-GCD-20 - Styrene	9.2	35.00%	11.00	1.000	77	93.31	17.03	100%	0.00
	Oxford White Gelcoat - Styrene	11.7	30.00%	4.32	1.000	169.36	102.98	18.79	100%	0.00
	Oxford White Gelcoat - MMA	11.7	5.00%	4.32	1.000	75	45.61	8.32	NA	
RGR3**	AOC C979-GCD-20 - Styrene	9.2	35.00%	11.00	1.000	77	93.31	17.03	100%	0.00
	Oxford White Gelcoat - Styrene	11.7	30.00%	4.32	1.000	169.36	102.98	18.79	100%	0.00
	Oxford White Gelcoat - MMA	11.7	5.00%	4.32	1.000	75	45.61	8.32	NA	
PGG1	Oxford White Gelcoat - Styrene	11.7	30.00%	0.22	3.000	169.36	15.73	2.87	100%	0.00
	Oxford White Gelcoat - MMA	11.7	5.00%	0.22	3.000	75	6.97	1.27	NA	
					Total VOC/HAP and PM from Resin and Gel Use**			**102.52**		**0.00**

* Open Molding Operations include the following: manual application, mechanical application, gel coat application, and filament application.
**Emission units RGR1, RGR2, and RGR3 can only apply the gel coat or the resin at one time. Therefore, the worst-case material/operation is counted toward total PTE.

METHODOLOGY

Acetone as cleanup solvent.
Assume all of the monomer is styrene.
Transfer Efficiency = 100% for Robotic and non-atomized (FIT) application equipment.
Emission factors based on the type of application from "Unified Emission Factors for Open Molding of Composites," Composites Fabricators Association
Potential VOC (lb/day) for resins or gels = Density (lb material /gal material) * Gal. of material (gal material/unit) * Maximum usage (unit/hr) * UEF (lb
Potential VOC (ton/year) = Potential VOC (lb/day) * 365 days/year * (1 ton/2000 lb)
Potential PM (ton/year) = Density * (1 - Weight % monomer or VOC) * Gal. of Material * Maximum Usage * (1 - transfer efficiency) * 24 hrs/day * 365 days/yr * (1 ton/2000 lb)

Appendix A: Emissions Calculations
VOC Emissions from Solvent Use
Resin and Gel Coat Reciprocators (RGR1, RGR2, & RGR3) and PGG1 FIT Applicator

Company Name: J.P., Inc. d/b/a Jasper Plastics Solutions
Address City IN Zip: 501 West Railroad Ave., Syracuse, Indiana 46567
Part 70 Operating Permit T085-32217-00013
Significant Permit Modification: 085-36657-00013
Significant Source Modification: 085-36655-00013
Permit Reviewer: APT

Process	Material	Density (lb/gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of solvent less water	Pounds VOC per gallon of solvent	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC (tons/yr)
RGR1														
	Zyvax Fiberglass Shield	7.3	90.00%	0.0%	90.0%	0.0%	0.00%	0.20000	1.000	6.57	6.57	1.31	31.54	5.76
	MEKP - Catalyst[1]	8.3	74.00%	2.0%	72.0%	2.0%	0.00%	0.18000	1.000	6.13	6.00	1.08	25.94	4.73
RGR2														
	Zyvax Fiberglass Shield	7.3	90.00%	0.0%	90.0%	0.0%	0.00%	0.20000	1.000	6.57	6.57	1.31	31.54	5.76
	MEKP - Catalyst[1]	8.3	74.00%	2.0%	72.0%	2.0%	0.00%	0.18000	1.000	6.13	6.00	1.08	25.94	4.73
RGR3														
	Zyvax Fiberglass Shield	7.3	90.00%	0.0%	90.0%	0.0%	0.00%	0.20000	1.000	6.57	6.57	1.31	31.54	5.76
	MEKP - Catalyst[1]	8.3	74.00%	2.0%	72.0%	2.0%	0.00%	0.18000	1.000	6.13	6.00	1.08	25.94	4.73
PGG1														
	MEKP - Catalyst[1]	8.3	74.00%	2.0%	72.0%	2.0%	0.00%	0.04500	3.000	6.13	6.00	0.81	19.46	3.55
	Potential Emissions											**5.60**	**134.41**	**24.53**

[1)] MEKP catalyst solution Cadox L-50A: 2,2,4-Trimethyl-1,3-pentanediol diisobutyrate, 70% max; MEK, 2% max; water, 2% max.

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used

Appendix A: Emissions Calculations
Reinforced Plastics and Composites
Open Molding Operations*
Resin and Gel Usage (PCG1 and PGG2)

Company Name: J.P., Inc. d/b/a Jasper Plastics Solutions
Address City IN Zip: 501 West Railroad Ave., Syracuse, Indiana 46567
Part 70 Operating Permit T085-32217-00013
Significant Permit Modification: 085-36657-00013
Significant Source Modification: 085-36655-00013
Permit Reviewer: APT

Emission Unit ID	Material (Resin or Gel Name)	Density (Lb/Gal)	Weight % Monomer	Gal of Mat. (gal/unit)	Maximum usage (unit/hour)	UEF (lbs monomer/ton resin or gel)	Potential VOC/HAP (pounds per day)	Potential VOC/HAP (tons per year)	Transfer Efficiency**	Potential PM (tons/ year)
PCG1	AOC C979-GCD-20 - Styrene	9.2	35.00%	0.55	3.000	77	14.00	2.55	100%	0.00
PGG2	Oxford White Gelcoat - Styrene	11.7	30.00%	0.22	3.000	169.36	15.73	2.87	100%	0.00
	Oxford White Gelcoat - MMA	11.7	5.00%	0.22	3.000	75	6.97	1.27	NA	
						Total VOC/HAP and PM from Resin and Gel Use**		**6.70**		**0.00**

* Open Molding Operations include the following: manual application, mechanical application, gel coat application, and filament application.
** Transfer efficiency is 100% for non-atomized FIT applicator.

METHODOLOGY
Acetone as cleanup solvent
Assume all of the monomer is styrene.
Emission factors based on the type of application from "Unified Emission Factors for Open Molding of Composites," Composites Fabricators Association (October
Potential VOC (lb/day) for resins or gels = Density (lb material /gal material) * Gal. of material (gal material/unit) * Maximum usage (unit/hr) * UEF (lb styrene/ton
Potential VOC (ton/year) = Potential VOC (lb/day) * 365 days/year * (1 ton/2000 lb)
Potential PM (ton/year) = Density * (1 - Weight % monomer or VOC) * Gal. of Material * Maximum Usage * (1 - transfer efficiency) * 24 hrs/day * 365 days/year * (1

Appendix A: Emissions Calculations
VOC Emissions
from PCG1 and PGG2 Solvent Use

Company Name: J.P., Inc. d/b/a Jasper Plastics Solutions
Address City IN Zip: 501 West Railroad Ave., Syracuse, Indiana 46567
Part 70 Operating Permit T085-32217-00013
Significant Permit Modification: 085-36657-00013
Significant Source Modification: 085-36655-00013
Permit Reviewer: APT

Process	Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of solvent less water	Pounds VOC per gallon of solvent	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year
PCG1	MEKP - Catalyst[1]	8.3	74.00%	2.0%	72.0%	2.0%	0.00%	0.10000	3.000	6.13	6.00	1.80	43.23	7.89
PGG2	MEKP - Catalyst[1]	8.3	74.00%	2.0%	72.0%	2.0%	0.00%	0.04500	3.000	6.13	6.00	0.81	19.46	3.55
Potential Emissions				**Add worst case coating to all solvents**								**2.61**	**62.69**	**11.44**

[1)] MEKP catalyst solution Cadox L-50A: 2,2,4-Trimethyl-1,3-pentanediol diisobutyrate, 70% max; MEK, 2% max; water, 2% max.

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used

Indiana Department of Environmental Management
We Protect Hoosiers and Our Environment.
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(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Michael R. Pence
Governor

Carol S. Comer
Commissioner

March 17, 2016

Mr. Sam Korenstra
J.P., Inc. d/b/a Jasper Plastics Solutions
501 West Railroad Avenue
Syracuse, IN 46567

Re: Public Notice
J.P., Inc. d/b/a Jasper Plastics Solutions
Permit Level: Title V Significant Source Modification and Significant Permit Modification
Permit Number: 085-36655-00013 and 085-36657-00013

Dear Mr. Korenstra:

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

The Office of Air Quality (OAQ) has prepared two versions of the Public Notice Document. The abbreviated version will be published in the newspaper, and the more detailed version will be made available on the IDEM's website and provided to interested parties. Both versions are included for your reference. The OAQ has requested that the Times Union in Warsaw, Indiana publish the abbreviated version of the public notice no later than March 19, 2016. 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 Syracuse Public Library, 115 East Main Street in Syracuse, 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 Katrina Gilbank, 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 4-9526 or dial (317) 234-9526.

Sincerely,

Vivian Haun

Vivian Haun
Permits Branch
Office of Air Quality

Enclosures
PN Applicant Cover letter 2/17/2016

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Commissioner

ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING

March 16, 2016

Times Union
PO Box 1448
Warsaw, IN 46581-1448

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for J.P., Inc. d/b/a Jasper Plastics Solutions, Kosciusko 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 March 19, 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 Vivian Haun at 800-451-6027 and ask for extension 3-6878 or dial 317-233-6878.

Sincerely,

Vivian Haun

Vivian Haun
Permit Branch
Office of Air Quality

Permit Level: Title V Significant Source Modification and Significant Permit Modification
Permit Number: 085-36655-00013 and 085-36657-00013

Enclosure

PN Newspaper.dot 2/17/2016

Indiana Department of Environmental Management
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(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Michael R. Pence
Governor

Carol S. Comer
Commissioner

March 17, 2016

To: Syracuse Public Library

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

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

Applicant Name: J.P., Inc. d/b/a Jasper Plastics Solutions
Permit Number: 085-36655-00013 and 085-36657-00013

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 2/17/2016

Indiana Department of Environmental Management
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Michael R. Pence
Governor

Carol S. Comer
Commissioner

Notice of Public Comment

March 17, 2016
J.P., Inc. d/b/a Jasper Plastics Solutions
085-36655-00013 and 085-36657-00013

Dear Concerned Citizen(s):

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

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

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

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

Enclosure
PN AAA Cover.dot 2/17/2016

Indiana Department of Environmental Management
We Protect Hoosiers and Our Environment.
100 N. Senate Avenue • Indianapolis, IN 46204
(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Michael R. Pence
Governor

Carol S. Comer
Commissioner

AFFECTED STATE NOTIFICATION OF PUBLIC COMMENT PERIOD
DRAFT INDIANA AIR PERMIT

March 17, 2016

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

Permit Number: **085-36655-00013 and 085-36657-00013**
Applicant Name: **J.P., Inc. d/b/a Jasper Plastics Solutions**
Location: **Syracuse, Kosciusko County, Indiana**

The public notice, draft permit and technical support documents can be accessed via the **IDEM Air Permits Online** site at:
http://www.in.gov/ai/appfiles/idem-caats/

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

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

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

Mail Code 61-53

IDEM Staff	VHAUN 3/17/2016 J.P., Inc dba Jasper Plastics Solutions 085-36655 and 36657-00013 DRAFT		AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender	▶	Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail: **CERTIFICATE OF MAILING ONLY**

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee Remarks
1		Sam Korenstra J.P., Inc dba Jasper Plastics Solutions 501 W Railroad Ave Syracuse IN 46567 (Source CAATS)									
2		Syracuse Town Council and Town Manager 310 N. Huntington St. Syracuse IN 46567 *(Local Official)*									
3		Kosciusko County Board of Commissioners 100 W. Center St, Room 220 Warsaw IN 46580 *(Local Official)*									
4		Syracuse Public Library 115 East Main Street Syracuse IN 46567 *(Library)*									
5		Kosciusko County Health Department 100 W. Center Street, 3rd Floor Warsaw IN 46580-2877 *(Health Department)*									
6		Mr. Kevin Parks D & B Environmental Services, Inc.. 401 Lincoln Way West Oscecola IN 46561 *(Consultant)*									
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Total number of pieces Listed by Sender	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is $50,000 per piece subject to a limit of $50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is $500. The maximum indemnity payable is $25,000 for registered mail, sent with optional postal insurance. See ***Domestic Mail Manual*** **R900, S913**, and **S921** for limitations of coverage on inured and COD mail. See ***International Mail Manual*** for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
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