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 the Renewal of a
Part 70 Operating Permit

for Patrick Industries, Inc. d/b/a Better Way Products in Elkhart County

Part 70 Operating Permit Renewal No.: T039-37292-00141

The Indiana Department of Environmental Management (IDEM) has received an application from Patrick Industries, Inc. d/b/a Better Way Products located at 70891 and 71103 County Road 23, New Paris, Indiana for a renewal of its Part 70 Operating Permit issued on March 22, 2012. If approved by IDEM's Office of Air Quality (OAQ), this proposed renewal would allow Patrick Industries, Inc. d/b/a Better Way Products to continue to operate its existing source.

This draft Part 70 Operating Permit does not contain any new equipment that would emit air pollutants; however, 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). This notice fulfills the public notice procedures to which those conditions are subject. IDEM has reviewed this application and has developed preliminary findings, consisting of a draft permit and several supporting documents, which would allow for these changes.

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

Goshen Public Library
601 S. 5th Street
Goshen, IN 46526

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 T039-37292-00141 in all correspondence.

Comments should be sent to:

Jean Fix
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for extension 4-8531
Or dial directly: (317) 234-8531
Fax: (317) 232-6749 attn: Jean Fix
E-mail: jfix@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 Jean Fix of my staff at the above address.

Iryn Calilung, Section Chief
Permits Branch
Office of Air Quality

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DRAFT

Part 70 Operating Permit Renewal
OFFICE OF AIR QUALITY

Patrick Industries, Inc. d/b/a Better Way Products
70891 and 71103 County Road 23
New Paris, Indiana 46553

(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.: T039-37292-00141	
Issued by: Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: Expiration Date:

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SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary fiberglass reinforced plastic parts manufacturing source.

Source Address:	70891 and 71103 County Road 23, New Paris, Indiana 46553
General Source Phone Number:	574-831-3340
SIC Code:	3089 (Plastics Products, Not Elswhere Classified)
County Location:	Elkhart
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Operating Permit Program Minor Source, under PSD and Emission Offset Rules Major Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

This stationary fiberglass reinforced plastic parts manufacturing operation consists of four (4) plants:

(a) Plant 1 is located at 70891 County Road 23, New Paris, Indiana 46553;

(b) Plant 2 is located at 70891 County Road 23, New Paris, Indiana 46553;

(c) Plant 3 is located at 70891 County Road 23, New Paris, Indiana 46553; and

(d) Plant 5 is located at 71103 County Road 23, New Paris, Indiana 46553.

IDEM, OAQ has determined that the four plants are one (1) major source, as defined by 326 IAC 2-7-1(22), because these plants are under common ownership and common control, have the same two-digit SIC Code and are located on contiguous properties.

(i) Plants 1 and 3 were initially determined as one source in SPM 039-17829-00141, issued on October 9, 2003.

(ii) Plant 5 was determined as one source in MSM 039-35362-00141, issued on January 28, 2015 and SPM 039-35134-00141, issued on March 31, 2015.

(iii) Plant 2 was determined as one source in the MSM 039-35667-00141, issued on April 29, 2015 and SPM 039-35692-00141, issued on June 26, 2015.

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

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

Plant 1:

(a) One (1) gel coat booth, identified as P1-G1, constructed in 1998, with a maximum capacity of 7.5 fiberglass parts per hour and 2.69 gallons of gel coat per part, equipped with a mechanical air-assisted airless spray applicator and dry filters for overspray control, exhausting to Stack S11.

Under NESHAP 40 CFR 63, Subpart WWWW, this facility is considered an existing open molding process and is part of an existing affected reinforced plastic composites production source.

(b) One (1) gel coat booth, identified as P1-G2, constructed in 2003, with a maximum capacity of 7.5 fiberglass parts per hour and 2.69 gallons of gel coat per part, equipped with a mechanical air-assisted airless spray applicator and dry filters for overspray control, exhausting to Stack S12.

Under NESHAP 40 CFR 63, Subpart WWWW, this facility is considered an existing open molding process and is part of an existing affected reinforced plastic composites production source.

(c) One (1) resin booth, identified as P1-R, constructed in 1998, with a maximum capacity of 7.5 fiberglass parts per hour and 7.96 gallons of resin per part, equipped with a mechanical fluid impingement applicator and dry filters for overspray control, exhausting to Stack S13.

Under NESHAP 40 CFR 63, Subpart WWWW, this facility is considered an existing open molding process and is part of an existing affected reinforced plastic composites production source.

(d) One (1) gel coat booth, identified as P1-G3, constructed in 2005, with a maximum capacity of 20 small fiberglass parts per hour and 0.05 gallons of gel coat per part , equipped with a mechanical air-assisted airless spray applicator and dry filters for overspray control, exhausting to Stack S16.

Under NESHAP 40 CFR 63, Subpart WWWW, this facility is considered an existing open molding process and is part of an existing affected reinforced plastic composites production source.

(e) One (1) resin booth, identified as P1-R2, constructed in 2005, with a maximum capacity of 20 small fiberglass parts per hour and 0.40 gallons of resin per part, equipped with a mechanical fluid impingement applicator and dry filters for overspray control, exhausting to Stack S15.

Under NESHAP 40 CFR 63, Subpart WWWW, this facility is considered an existing open molding process and is part of an existing affected reinforced plastic composites production source.

(f) One (1) resin transfer molding (RTM) area, constructed in 2003, utilizing an injection, closed molding process and 30,000 pounds of styrene resins per year, with a maximum capacity of one (1) fiberglass part per hour and 0.35 gallons of resin per part, uncontrolled, exhausting indoors.

Under NESHAP 40 CFR 63, Subpart WWWW, this facility is considered an existing closed molding process and is part of an existing affected reinforced plastic composites production source.

(g) One (1) final finish area, identified as P1-FF, constructed in 1998, uncontrolled, exhausting indoors, consisting of the following:

(1) Gel coat and resin application with catalyst utilizing manual application methods (hand and hand wiping), with a maximum capacity of 7.5 fiberglass parts per hour, using 0.016 gallons of gel coat per part, and 0.025 gallons of resin per part.

Under NESHAP 40 CFR 63, Subpart WWWW, this facility is considered an existing open molding process and is part of an existing affected reinforced plastic composites production source.

(2) Adhesive and sealant application, utilizing aerosol cans for repairing assembled parts, with a maximum capacity of 7.5 fiberglass parts per hour and 0.00029 gallons of adhesive per part.

The adhesive and sealant application is not subject to 40 CFR 63, Subpart WWWW.

(h) One (1) assembly operation, identified as P1-AO, constructed in 1998, with a maximum capacity of 7.5 fiberglass parts per hour and 0.003 gallons of adhesive, caulk, and cleaner per part, utilizing manual application methods (hand wiping) and equipped with a HVLP spray applicator, uncontrolled, exhausting indoors.

Under NESHAP 40 CFR 63, Subpart WWWW, this facility is considered an existing open molding process and is part of an existing affected reinforced plastic composites production source.

(i) One (1) grinding booth, identified as P1-GRIND, with one (1) hand grinder, constructed in 1998, with a maximum capacity of 7.5 fiberglass parts or 612 pounds of fiberglass parts per hour, using dry filters for particulate control, exhausting to Stacks S9, S10, and S14.

(j) One (1) grinding booth, identified as P1-SPGRIND, with one (1) hand grinder, constructed in 2007, with a capacity of 160 small fiberglass parts per hour or 108 pounds of fiberglass parts per hour, using dry filters for particulate control, exhausting inside the building.

(k) One (1) resin application booth, identified as P1-R4, constructed in 2015, with a maximum capacity of 7.5 fiberglass parts per hour and 7.96 gallons of resin per part, equipped with two (2) mechanical fluid impingement applicators and dry filters for overspray control, exhausting to Stacks P1-R4S1 and P1-R4S2.

Under NESHAP 40 CFR 63, Subpart WWWW, this facility is considered an existing open molding process and is part of an existing affected reinforced plastic composites production source.

Plant 2:

(a) One (1) gel coat booth, identified as P2-MSGG1, constructed in 2015, with a maximum capacity of 0.25 molds per hour and 1.22 gallons of gel coat per mold, equipped with HVLP gel coat application, using dry filter bank for particulate control, exhausting to Stack MS1-S.

Under NESHAP 40 CFR 63, Subpart WWWW, this facility is considered an existing open molding process and is part of an existing affected reinforced plastic composites production source.

(b) One (1) FIT chop booth, identified as P2-MSCG1, constructed in 2015, with a maximum capacity of 0.25 molds per hour and 9.6 gallons of resin per mold, using dry filter bank for particulate control, exhausting to Stack MS2-S.

Under NESHAP 40 CFR 63, Subpart WWWW, this facility is considered an existing open molding process and is part of an existing affected reinforced plastic composites production source.

(c) One (1) mold shop miscellaneous coating operation, identified as P2-MSMISC, constructed in 2015, with a maximum capacity of 0.25 molds per hour and 0.10 gallons of coating per mold, uncontrolled and exhausting inside the building.

(d) One (1) grinding booth, identified as P2-MSGRIND1, constructed in 2015, with a maximum capacity of 500 pounds of molds per hour, using dry filters for particulate control, exhausting inside the building

Plant 3:

(a) One (1) resin transfer closed molding unit, identified as RTM1, installed in 2010, with a throughput capacity of five (5) parts per hour and 0.60 gallons of resin per part, utilizing mechanical non-atomized resin application method, uncontrolled, exhausting indoors.

Under NESHAP 40 CFR 63, Subpart WWWW, this facility is considered an existing closed molding process and is part of an existing affected reinforced plastic composites production source.

Plant 5:

(a) One (1) gel coat booth, identified as P5-G, constructed in 1996, with a maximum capacity of 7.5 fiberglass parts per hour and 1.79 gallons of gel coat per part, equipped with a mechanical air-assisted airless spray applicator and dry filters for overspray control, exhausting to Stack S4.

Under NESHAP 40 CFR 63, Subpart WWWW, this facility is considered an existing open molding process and is part of an existing affected reinforced plastic composites production source.

(b) One (1) resin chop area, identified as P5-R, constructed in 1996, with a maximum capacity of 7.5 fiberglass parts per hour and 4.44 gallons of resin per part, equipped with a mechanical fluid impingement applicator and dry filters for overspray control, exhausting to Stacks S7 and S8.

Under NESHAP 40 CFR 63, Subpart WWWW, this facility is considered an existing open molding process and is part of an existing affected reinforced plastic composites production source.

(c) One (1) gel coat/resin chop application area, identified as P5-LTGR, constructed in 2003, with a maximum capacity of 7.5 fiberglass parts per hour, using 0.061 gallons of gel coat per part and 1.05 gallons of resin per part, equipped with a mechanical non-atomized applicator and dry filters for overspray control, exhausting to Stacks S2 and S3.

Under NESHAP 40 CFR 63, Subpart WWWW, this facility is considered an existing open molding process and is part of an existing affected reinforced plastic composites production source.

(d) One (1) final finish area, identified as P5-FF, constructed in 1996, uncontrolled, exhausting indoors, consisting of the following:

(1) Gel coat and resin application with catalyst utilizing manual application methods (hand and hand wiping), with a maximum capacity of 7.5 fiberglass parts per hour, using 0.02 gallons of gel coat per part, and 0.3 gallons of resin per part.

Under NESHAP 40 CFR 63, Subpart WWWW, this facility is considered an existing open molding process and is part of an existing affected reinforced plastic composites production source.

(2) Adhesive and sealant application, utilizing aerosol cans for repairing assembled parts, with a maximum capacity of 7.5 fiberglass parts per hour and 0.0003 gallons adhesive per part.

The adhesive and sealant application is not subject to 40 CFR 63, Subpart WWWW.

(e) One (1) assembly operation, identified as P5-AO, constructed in 1996, with a maximum capacity of 7.5 fiberglass parts per hour and 0.003 gallons of adhesive, caulk, and cleaner per part, utilizing manual application methods (hand wiping) and equipped with a HVLP spray applicator, uncontrolled, exhausting indoors.

Under NESHAP 40 CFR 63, Subpart WWWW, this facility is considered an existing open molding process and is part of an existing affected reinforced plastic composites production source.

(f) One (1) grinding booth with a maximum of four (4) grinders, identified as P5-GRIND#1, constructed in 2007, with a maximum capacity of 504 pounds of fiberglass parts per hour, equipped with dry filters for particulate control, exhausting to Stack S5.

(g) One (1) grinding booth with a maximum of four (4) grinders, identified as P5-GRIND#2, constructed in 1996, with a maximum capacity of 216 pounds of fiberglass parts per hour, using dry filters for particulate control, exhausting to Stack S6.

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

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

(a) Natural gas-fired combustion sources consisting of:

Plant 1:

(1) One (1) air makeup unit, identified as P1-A1, constructed in 1998, rated at 4.80 million British thermal units per hour, venting indoors.

(2) Eight (8) radiant heaters, identified as P1-R1 through P1-R8, constructed in 1998, each rated at 0.150 million British thermal units per hour, all exhausting to a stack that vents to the atmosphere.

(3) One (1) radiant heater, identified as P1-R9, constructed in 1998, rated at 0.100 million British thermal units per hour, exhausting to a stack that vents to the atmosphere.

(4) Two (2) office heaters, identified as P1-H1 and P1-H2, constructed in 1998, each rated at 0.100 million British thermal units per hour, all exhausting to a stack that vents to the atmosphere.

Plant 2:

(1) One (1) air makeup unit, identified as P2-MSAM1, constructed in 2015, with a maximum heat input rated at 4.80 million British thermal units per hour, venting indoors.

(2) Five (5) radiant heaters, identified as MSRH1- MSRH5, constructed in 2015, each with a maximum heat input rated at 0.150 million British thermal units per hour, all exhausting to a stack that vents to the atmosphere.

Plant 3:

(1) Two (2) radiant heaters, identified as P3-R1 and P3-R2, constructed in 2000, each rated at 0.150 million British thermal units per hour, all exhausting to a stack that vents to the atmosphere.

(2) One (1) radiant heater, identified as P3-R3, constructed in 2000, rated at 0.100 million British thermal units per hour, exhausting to a stack that vents to the atmosphere.

Plant 5:

(1) One (1) Air Makeup unit, identified as P5-A1, constructed in 2015, rated at 4.8 million British thermal units per hour, venting indoors.

(2) Six (6) Radiant heaters, identified as P5-R1 to R6, constructed in 2015, each rated at 0.15 million British thermal units per hour, all exhausting to a stack that vents to the atmosphere.

(b) Combustion source flame safety purging on startup.

(c) Application of oils, greases lubricants or other nonvolatile materials applied as temporary protective coatings.

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

(e) One (1) solvent recycling unit to recover acetone, identified as P1-AR, constructed on May 9, 2005, with a batch capacity of fifty-five (55) gallons. P1-AR is considered to be an insignificant activity pursuant to 326 IAC 2-7-1(21)(K)(viii).

(f) One (1) robotically controlled water jet cutting unit, identified as P5-WJ, constructed on May 9, 2005, located in Plant 5. P5-WJ is considered to be a trivial activity pursuant to 326 IAC 2-7-1(41)(D)(xi).

(g) Plant 1:

(1) One (1) 5,581.45 gallon above ground vertical fixed roof resin storage tank, identified as P1-RT1, constructed on 3/5/1998, and one (1) enclosed, in-line sheer mixing tank, identified as P1-R2SM, constructed on 5/9/2005.

Under NESHAP 40 CFR 63, Subpart WWWW, this facility is considered an existing HAP storage/mixing tank and is part of an existing affected reinforced plastic composites production source.

(h) Plant 2:

(1) Miscellaneous particulate matter operations, identified as P2-MPM, consisting of plywood cutting for mold construction, with a maximum capacity of 32 pounds of plywood per hour, uncontrolled, exhausting indoors.

(i) Plant 3:

(1) One (1) tooling gel coat and resin operation, consisting of one (1) booth, identified as P3-R/G, constructed in 1996 and 1997, with a total maximum capacity of 0.10 fiberglass parts per hour, using 1.22 gallons of gel coat per part and 13.7 gallons of resin per part, equipped with a high efficiency air-atomized applicator for the gel coat operation and equipped with an airless spray applicator and manual application for resins, using dry filters for control, exhausting to Stack S1.

Under NESHAP 40 CFR 63, Subpart WWWW, this facility is considered an existing open molding process and is part of an existing affected reinforced plastic composites production source.

(j) Plant 5:

(1) One (1) 5,581.45 gallon above ground vertical fixed roof resin storage tank, identified as P5-RT1, constructed in 2015, and two (2) enclosed, in-line sheer mixing tanks, identified as P5-RSM1 and P5-RSM2, constructed in 2015.

Under NESHAP 40 CFR 63, Subpart WWWW, this facility is considered an existing HAP storage/mixing tank and is part of an existing affected reinforced plastic composites production source.

(2) One (1) waste acetone recycling unit, identified as P5-AR, permitted in 2015, with a maximum throughput capacity of 2.29 gallons per hour of waste acetone, which contains methanol, uncontrolled, and exhausting inside the building.

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

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

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

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

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

SECTION B GENERAL CONDITIONS

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

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

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

(a) This permit, T039-37292-00141, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than April 15 of each year to:

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

and

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

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

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

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

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

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

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

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

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

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

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

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

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

The Permittee shall implement the PMPs.

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

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

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

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

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

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

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

The Permittee shall implement the PMPs.

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

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

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

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

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

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

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

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

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ or Northern Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

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

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

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

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

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

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

(C) Corrective actions taken.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

(a) All terms and conditions of permits established prior to T039-37292-00141 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) and (c)(1). The Permittee shall make such records available, upon reasonable request, for public review.

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

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

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

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

(3) Any change in emissions; and

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

C.2 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

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

C.6 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 by using ambient air quality modeling pursuant to 326 IAC 1-7-4. 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)][40 CFR 64][326 IAC 3-8]

(a) For new units:
Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units shall be implemented on and after the date of initial start-up.

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

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

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

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

(c) For monitoring required by CAM, at all times, the Permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

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

C.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(11)][40 CFR 68]

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

C.14 Response to Excursions or Exceedances [40 CFR 64][326 IAC 3-8][326 IAC 2-7-5][326 IAC 2-7-6]

(I) Upon detecting an excursion where a response step is required by the D Section, or an exceedance of a limitation, not subject to CAM, in this permit:

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

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

(1) initial inspection and evaluation;

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

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

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

(1) monitoring results;

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

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

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

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

(II)

(a) CAM *Response to excursions or exceedances.*

(1) Upon detecting an excursion or exceedance, subject to CAM, the Permittee shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized

distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

(2) Determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.

(b) If the Permittee identifies a failure to achieve compliance with an emission limitation, subject to CAM, or standard, subject to CAM, for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the Permittee shall promptly notify the IDEM, OAQ and, if necessary, submit a proposed significant permit modification to this permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

(c) Based on the results of a determination made under paragraph (II)(a)(2) of this condition, the EPA or IDEM, OAQ may require the Permittee to develop and implement a Quality Improvement Plan (QIP). The Permittee shall develop and implement a QIP if notified to in writing by the EPA or IDEM, OAQ.

(d) Elements of a QIP:
The Permittee shall maintain a written QIP, if required, and have it available for inspection. The plan shall conform to 40 CFR 64.8 b (2).

(e) If a QIP is required, the Permittee shall develop and implement a QIP as expeditiously as practicable and shall notify the IDEM, OAQ if the period for completing the improvements contained in the QIP exceeds 180 days from the date on which the need to implement the QIP was determined.

(f) Following implementation of a QIP, upon any subsequent determination pursuant to paragraph (II)(c) of this condition the EPA or the IDEM, OAQ may require that the Permittee make reasonable changes to the QIP if the QIP is found to have:

(1) Failed to address the cause of the control device performance problems; or

(2) Failed to provide adequate procedures for correcting control device performance problems as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.

(g) Implementation of a QIP shall not excuse the Permittee from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting or recordkeeping requirement that may apply under federal, state, or local law, or any other applicable requirements under the Act.

(h) *CAM recordkeeping requirements.*

(1) The Permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to paragraph (II)(c) of this condition

and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under this condition (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions). Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

(2) Instead of paper records, the owner or operator may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review, and does not conflict with other applicable recordkeeping requirements

C.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] [40 CFR 64][326 IAC 3-8]

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

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

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

(1) Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;

(2) Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and

(3) A description of the actions taken to implement a QIP during the reporting period as specified in Section C-Response to Excursions or Exceedances. Upon completion of a QIP, the owner or operator shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring.

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

(b) The address for report submittal is:

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

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

(d) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit “calendar year” means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

C.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:

Plant 1:

(a) One (1) gel coat booth, identified as P1-G1, constructed in 1998, with a maximum capacity of 7.5 fiberglass parts per hour and 2.69 gallons of gel coat per part, equipped with a mechanical air-assisted airless spray applicator and dry filters for overspray control, exhausting to Stack S11.

Under NESHAP 40 CFR 63, Subpart WWWW, this facility is considered an existing open molding process and is part of an existing affected reinforced plastic composites production source.

(b) One (1) gel coat booth, identified as P1-G2, constructed in 2003, with a maximum capacity of 7.5 fiberglass parts per hour and 2.69 gallons of gel coat per part, equipped with a mechanical air-assisted airless spray applicator and dry filters for overspray control, exhausting to Stack S12.

Under NESHAP 40 CFR 63, Subpart WWWW, this facility is considered an existing open molding process and is part of an existing affected reinforced plastic composites production source.

(c) One (1) resin booth, identified as P1-R, constructed in 1998, with a maximum capacity of 7.5 fiberglass parts per hour and 7.96 gallons of resin per part, equipped with a mechanical fluid impingement applicator and dry filters for overspray control, exhausting to Stack S13.

Under NESHAP 40 CFR 63, Subpart WWWW, this facility is considered an existing open molding process and is part of an existing affected reinforced plastic composites production source.

(d) One (1) gel coat booth, identified as P1-G3, constructed in 2005, with a maximum capacity of 20 small fiberglass parts per hour and 0.05 gallons of gel coat per part , equipped with a mechanical air-assisted airless spray applicator and dry filters for overspray control, exhausting to Stack S16.

Under NESHAP 40 CFR 63, Subpart WWWW, this facility is considered an existing open molding process and is part of an existing affected reinforced plastic composites production source.

(e) One (1) resin booth, identified as P1-R2, constructed in 2005, with a maximum capacity of 20 small fiberglass parts per hour and 0.40 gallons of resin per part, equipped with a mechanical fluid impingement applicator and dry filters for overspray control, exhausting to Stack S15.

Under NESHAP 40 CFR 63, Subpart WWWW, this facility is considered an existing open molding process and is part of an existing affected reinforced plastic composites production source.

(f) One (1) resin transfer molding (RTM) area, constructed in 2003, utilizing an injection, closed molding process and 30,000 pounds of styrene resins per year, with a maximum capacity of one (1) fiberglass part per hour and 0.35 gallons of resin per part, uncontrolled, exhausting indoors.

Under NESHAP 40 CFR 63, Subpart WWWW, this facility is considered an existing closed molding process and is part of an existing affected reinforced plastic composites production source.

(g) One (1) final finish area, identified as P1-FF, constructed in 1998, uncontrolled, exhausting indoors, consisting of the following:

(1) Gel coat and resin application with catalyst utilizing manual application methods (hand and hand wiping), with a maximum capacity of 7.5 fiberglass parts per hour, using 0.016 gallons of gel coat per part, and 0.025 gallons of resin per part.

Under NESHAP 40 CFR 63, Subpart WWWW, this facility is considered an existing open molding process and is part of an existing affected reinforced plastic composites production source.

(2) Adhesive and sealant application, utilizing aerosol cans for repairing assembled parts, with a maximum capacity of 7.5 fiberglass parts per hour and 0.00029 gallons of adhesive per part.

The adhesive and sealant application is not subject to 40 CFR 63, Subpart WWWW.

(h) One (1) assembly operation, identified as P1-AO, constructed in 1998, with a maximum capacity of 7.5 fiberglass parts per hour and 0.003 gallons of adhesive, caulk, and cleaner per part, utilizing manual application methods (hand wiping) and equipped with a HVLP spray applicator, uncontrolled, exhausting indoors.

Under NESHAP 40 CFR 63, Subpart WWWW, this facility is considered an existing open molding process and is part of an existing affected reinforced plastic composites production source.

(k) One (1) resin application booth, identified as P1-R4, constructed in 2015, with a maximum capacity of 7.5 fiberglass parts per hour and 7.96 gallons of resin per part, equipped with two (2) mechanical fluid impingement applicators and dry filters for overspray control, exhausting to Stacks P1-R4S1 and P1-R4S2.

Under NESHAP 40 CFR 63, Subpart WWWW, this facility is considered an existing open molding process and is part of an existing affected reinforced plastic composites production source.

Plant 2:

(a) One (1) gel coat booth, identified as P2-MSGG1, constructed in 2015, with a maximum capacity of 0.25 molds per hour and 1.22 gallons of gel coat per mold, equipped with HVLP gel coat application, using dry filter bank for particulate control, exhausting to Stack MS1-S.

Under NESHAP 40 CFR 63, Subpart WWWW, this facility is considered an existing open molding process and is part of an existing affected reinforced plastic composites production source.

(b) One (1) FIT chop booth, identified as P2-MSCG1, constructed in 2015, with a maximum capacity of 0.25 molds per hour and 9.6 gallons of resin per mold, using dry filter bank for particulate control, exhausting to Stack MS2-S.

Under NESHAP 40 CFR 63, Subpart WWWW, this facility is considered an existing open molding process and is part of an existing affected reinforced plastic composites production

source.

(c) One (1) mold shop miscellaneous coating operation, identified as P2-MSMISC, constructed in 2015, with a maximum capacity of 0.25 molds per hour and 0.10 gallons of coating per mold, uncontrolled and exhausting inside the building.

Plant 3:

(a) One (1) resin transfer closed molding unit, identified as RTM1, installed in 2010, with a throughput capacity of five (5) parts per hour and 0.60 gallons of resin per part, utilizing mechanical non-atomized resin application method, uncontrolled, exhausting indoors.

Under NESHAP 40 CFR 63, Subpart WWWW, this facility is considered an existing closed molding process and is part of an existing affected reinforced plastic composites production source.

Plant 5:

(a) One (1) gel coat booth, identified as P5-G, constructed in 1996, with a maximum capacity of 7.5 fiberglass parts per hour and 1.79 gallons of gel coat per part, equipped with a mechanical air-assisted airless spray applicator and dry filters for overspray control, exhausting to Stack S4.

Under NESHAP 40 CFR 63, Subpart WWWW, this facility is considered an existing open molding process and is part of an existing affected reinforced plastic composites production source.

(b) One (1) resin chop area, identified as P5-R, constructed in 1996, with a maximum capacity of 7.5 fiberglass parts per hour and 4.44 gallons of resin per part, equipped with a mechanical fluid impingement applicator and dry filters for overspray control, exhausting to Stacks S7 and S8.

Under NESHAP 40 CFR 63, Subpart WWWW, this facility is considered an existing open molding process and is part of an existing affected reinforced plastic composites production source.

(c) One (1) gel coat/resin chop application area, identified as P5-LTGR, constructed in 2003, with a maximum capacity of 7.5 fiberglass parts per hour, using 0.061 gallons of gel coat per part and 1.05 gallons of resin per part, equipped with a mechanical non-atomized applicator and dry filters for overspray control, exhausting to Stacks S2 and S3.

Under NESHAP 40 CFR 63, Subpart WWWW, this facility is considered an existing open molding process and is part of an existing affected reinforced plastic composites production source.

(d) One (1) final finish area, identified as P5-FF, constructed in 1996, uncontrolled, exhausting indoors, consisting of the following:

(1) Gel coat and resin application with catalyst utilizing manual application methods (hand and hand wiping), with a maximum capacity of 7.5 fiberglass parts per hour, using 0.02 gallons of gel coat per part, and 0.3 gallons of resin per part.

Under NESHAP 40 CFR 63, Subpart WWWW, this facility is considered an existing open molding process and is part of an existing affected reinforced plastic composites production source.

(2) Adhesive and sealant application, utilizing aerosol cans for repairing assembled parts,

with a maximum capacity of 7.5 fiberglass parts per hour and 0.0003 gallons adhesive per part.

(The adhesive and sealant application is not subject to 40 CFR 63, Subpart WWWW.)

(e) One (1) assembly operation, identified as P5-AO, constructed in 1996, with a maximum capacity of 7.5 fiberglass parts per hour and 0.003 gallons of adhesive, caulk, and cleaner per part, utilizing manual application methods (hand wiping) and equipped with a HVLP spray applicator, uncontrolled, exhausting indoors.

Under NESHAP 40 CFR 63, Subpart WWWW, this facility is considered an existing open molding process and is part of an existing affected reinforced plastic composites production source.

Specifically Regulated Insignificant Activities:

(g) Plant 1:

(1) One (1) 5,581.45 gallon above ground vertical fixed roof resin storage tank, identified as P1-RT1, constructed on 3/5/1998, and one (1) enclosed, in-line sheer mixing tank, identified as P1-R2SM, constructed on 5/9/2005.

Under NESHAP 40 CFR 63, Subpart WWWW, this facility is considered an existing HAP storage/mixing tank and is part of an existing affected reinforced plastic composites production source.

(i) Plant 3:

(1) One (1) tooling gel coat and resin operation, consisting of one (1) booth, identified as P3-R/G, constructed in 1996 and 1997, with a total maximum capacity of 0.10 fiberglass parts per hour, using 1.22 gallons of gel coat per part and 13.7 gallons of resin per part, equipped with a high efficiency air-atomized applicator for the gel coat operation and equipped with an airless spray applicator and manual application for resins, using dry filters for control, exhausting to Stack S1.

Under NESHAP 40 CFR 63, Subpart WWWW, this facility is considered an existing open molding process and is part of an existing affected reinforced plastic composites production source.

(j) Plant 5:

(1) One (1) 5,581.45 gallon above ground vertical fixed roof resin storage tank, identified as P5-RT1, constructed in 2015, and two (2) enclosed, in-line sheer mixing tanks, identified as P5-RSM1 and P5-RSM2, constructed in 2015.

Under NESHAP 40 CFR 63, Subpart WWWW, this facility is considered an existing HAP storage/mixing tank and is part of an existing affected reinforced plastic composites production source.

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

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

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

In order to render 326 IAC 2-2 (PSD) not applicable, the total VOC emissions from the following shall be limited to less than two hundred forty four and five tenths (244.5) tons per twelve (12) consecutive month period with compliance determined at the end of each month:

Plant 1
(i) gel coat booths (P1-G1 and P1-G2)
(ii) resin booth (P1-R)
(iii) gel coat booth (P1-G3)
(iv) resin booth (P1-R2)
(v) resin transfer molding (RTM) area
(vi) final finish area (P1-FF)
(vii) assembly operation (P1-AO)
(viii) resin application booth (P1-R4)

Plant 2:
(i) gel coat booth (P2-MSGG1)
(ii) FIT chop booth (P2-MSCG1)

Plant 3
(i) resin transfer closed molding unit (RTM1)
(ii) tooling gel coat and resin operation (P3-R/G)

Plant 5
(i) gel coat booth (P5-G)
(ii) resin chop area (P5-R)
(iii) gel coat/resin chop application area (P5-LTGR)
(iv) final finish area (P5-FF)
(v) assembly operation (P5-AO)

Compliance with the above limit in conjunction with the unlimited VOC emissions from all other emission units at the source will limit the source-wide VOC emissions less than 250 tons per year and render 326 IAC 2-2 (PSD) not applicable. Therefore, this is a minor source under 326 IAC 2-2 (PSD).

D.1.2 Volatile Organic Compound Limit [326 IAC 8-1-6]

(a) P1-G1 and P1-R:
Pursuant to the 326 IAC 8-1-6 BACT determination in CP039-8708-00141, issued on March 5, 1998 and SPM 039-17869-00141, issued on October 9, 2003, the Permittee shall comply with the following:

(1) The Permittee shall utilize an air-assisted airless spray applicator for gel coat and mechanical nonatomized application technology for resin. Air-assisted airless spray technology means a coating application system in which the coating fluid (including gel coat or resin) is supplied to the gun under fluid pressure; and air is combined at the spray cap of the gun.

(2) The combined potential to emit VOC from gelcoat booth, identified as P1-G1, and resin booth, identified as P1-R, shall be limited to less than a total of two hundred twenty eight (228) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

(3) The maximum styrene content of the resins used shall not exceed 60.0 percent by weight.

(b) P1-G2, P5-G, P5-R and P5-LTGR:
Pursuant to the 326 IAC 8-1-6 BACT determination in initial Title V Permit 039-7106-00141, issued December 30, 1999 and SPM 039-17869-00141, issued on October 9, 2003, the Permittee of the two (2) gel coat booths, identified as P1-G2 and P5-G, the resin booth, identified as P5-R, and the gelcoat/resin chop application, identified as P5-LTGR, shall comply with the following:

(1) The total HAP monomer content of the following materials shall be limited based on the application method used and the products produced as specified in the following table:

Fiber Reinforced Plastics Composites Products Except Watercraft	HAP Monomer Content, Weight Percent
Resin, manual or mechanical application	
Production - Specialty products	48
Production - Non-corrosion resistant unfilled	38
Production - Non-corrosion resistant filled	35
Production - Non-corrosion resistant, applied to thermoformed thermoplastic sheet	42
Production - Class I, Flame and Smoke	60
Shrinkage controlled	52
Tooling	43
Gel coat application	
Production - Pigmented	37
Clear production	44
Tooling	45
Production - pigmented, subject to ANSI standards	45
Production - clear, subject to ANSI standards	50

(2) The following categories of materials shall be applied using mechanical nonatomized application technology or manual application:

(A) Production noncorrosion resistant, unfilled resins from all sources.

(B) Production, specialty products resins from all sources.

(C) Tooling resins used in the manufacture of water craft.

(D) Production resin used for Class I flame and smoke products.

(3) Unless specified in subsection (2), gel coat application and mechanical application of resins shall be by any of the following spray technologies:

(A) Nonatomized application technology.

(B) Air-assisted airless.

(C) Airless.

(D) High volume, low pressure.

(E) Equivalent emission reduction technologies to subdivisions (B) through (D).

(4) The Permittee shall operate the two (2) gel coat booths, identified as P1-G2, and P5-G, the resin booth, identified as P5-R, and the gelcoat/resin chop application, identified as P5-LTGR, in accordance with the following work practices standards:

(A) Nonatomizing spray equipment shall not be operated at pressures that atomize the material during the application process.

(B) Except for mixing containers as described in subsection (g), HAP containing materials shall be in a closed container when not in use.

(C) Solvent sprayed during cleanup and resin changes shall be directed into solvent collection containers.

(D) Solvent collection conditions shall be kept closed when not in use.

(E) Clean-up rags with solvent shall be closed when not in use.

(F) Closed containers shall be used for the storage of the following:

(i) All production and tooling resins that contain HAPs.

(ii) All production and tooling gel coats that contain HAPs.

(iii) Waste resins and gel coats that contain HAPs.

(iv) Cleaning materials, including waste cleaning materials.

(v) Other materials that contain HAPs.

(G) All resin and gel coat mixing containers with a capacity equal to or greater than fifty-five (55) gallons must have a cover with no visible gaps in place at all times when material is being added to or removed from a container, or mixing or pumping equipment is being placed in or removed from a container.

(H) For routine flushing of resin and gel coat application equipment, such as spray guns, flowcoaters, brushes, rollers, and squeegees, owners or operators must use a cleaning solvent that contains no HAPs. However, recycled cleaning solvents that contain less than or equal to five percent (5%) HAP by weight are considered to contain no HAP for the purposes of this subdivision. For removing cured resin or gel coat from application equipment, no organic HAP limit applies.

(5) All new and existing personnel, including contract personnel, who are involved in resin and gel coat spraying and spray-like applications, identified as P1-G2, P5-G, P5-R and P5-LTGR (for example, those applications that could result in excess emissions if performed improperly) shall be trained according to the following schedule:

(A) All personnel hired after March 1, 2001 shall be trained within fifteen (15) days of hiring.

(B) All personnel hired before March 7, 2001 shall be trained or evaluated by a supervisor within thirty (30) days of the start of operation.

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

(D) Personnel who have been trained by another owner or operator subject to 326 IAC 20-25 are exempt from subdivision (A) if written documentation that the employee's training is current is provided to the new employer.

(E) If the result of an evaluation shows that training is needed, such training shall occur within fifteen (15) days of the evaluation.

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

(i) Appropriate application techniques.

(ii) Appropriate equipment cleaning procedures.

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

D.1.3 Single HAP Minor Source Modification Limit [326 IAC 2-7-10.5(d)(4)]

Pursuant to Minor Source Modification 039-21091-00141, issued on May 9, 2005, Minor Permit Modification 039-21115-00141, issued July 20, 2005, and 326 IAC 2-7-10.5(d)(4), the total potential to emit of single HAP from the resin booth, identified as P1-R2, and the gel coat booth, identified as P1-G3, shall be limited to less than ten (10) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with this limit renders 326 IAC 2-7-10.5(f) not applicable to the 2005 modification.

D.1.4 PSD Minor 326 IAC 2-2]

In order to render 326 IAC 2-2 not applicable, the PM, PM10 and PM2.5 emissions after control from the facilities listed in the table below shall not exceed specified limit:

Plant	Emission Unit	PM limit (lbs/hr)	PM10 limit (lbs/hr)	PM2.5 limit (lbs/hr)
Plant 1	gel coat booth (P1-G1)	3.44	3.44	3.44
	gel coat booth (P1-G2)	3.44	3.44	3.44
	gel coat booth (P1-G3)	0.17	0.17	0.17
	assembly operation (P1-AO)	0.01	0.01	0.01
	resin application booth (P1-R4)	1.82	1.82	1.82
Plant 5	gel coat booth (P5-G)	2.28	2.28	2.28
	gel coat/resin chop application area (P5-LTGR)	0.02	0.02	0.02
	assembly operation (P5-AO)	0.01	0.01	0.01
Plant 3	Tooling gel coat/resin operation (P3-R/G)	0.02	0.02	0.02

Compliance with the above limits in conjunction with Condition D.2.2 and unlimited particulate emissions from all other emission units at the source will limit the source-wide PM, PM10, and PM2.5 emissions, each, less than 250 tons per year and render 326 IAC 2-2 not applicable.

Therefore, this is a minor source under 326 IAC 2-2.

D.1.5 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from the following reinforced plastic composites production processes shall be controlled by a dry particulate filter and the Permittee shall operate the control device in accordance with manufacturer's specifications:

Plant 1
(i) gel coat booths (P1-G1 and P1-G2)
(ii) gel coat booth (P1-G3)
(iii) resin application booth (P1-R4)

Plant 2:
(i) gel coat booth (P2-MSGG1)

Plant 3
(i) tooling gel coat and resin operation (P3-R/G)

Plant 5
(i) gel coat booth (P5-G)
(ii) gel coat/resin chop application area (P5-LTGR)

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 obligations with regard to the Preventive Maintenance Plan required by this condition.

D.1.7 Operator Training for Reinforced Plastic Composites Fabrication [326 IAC 20-56-2][

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

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

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

(2) To ensure training goals listed in 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 paragraph (1) if written documentation that the employee's training is current is provided to the new employer.

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

(1) Appropriate application techniques.

(2) Appropriate equipment cleaning procedures.

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

(c) The owner or operator shall maintain the following training records on site and make

them available for inspection and review:

(1) A copy of the current training program.

(2) A list of the following:

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

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

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

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

D.1.8 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAP) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

Compliance with the VOC emission limitations contained in Conditions D.1.1 and D.1.2 and single HAP emission limitation contained in Conditions D.1.3 shall be determined as follows:

(a) Open Molding Operations:

The total VOC emissions from the open molding operations listed below shall be determined using the equation followed by these lists.

Plant 1
(i) gel coat booths (P1-G1 and P1-G2)
(ii) resin booth (P1-R)
(iii) gel coat booth (P1-G3)
(iv) resin booth (P1-R2)
(v) final finish area (P1-FF)
(vi) resin application booth (P1-R4)

Plant 2:
(i) gel coat booth (P2-MSGG1)
(ii) FIT chop booth (P2-MSCG1)

Plant 3
(i) tooling gel coat and resin operation (P3-R/G)

Plant 5
(i) gel coat booth (P5-G)
(ii) resin chop area (P5-R)
(iii) gel coat/resin chop application area (P5-LTGR)
(iv) final finish area (P5-FF)

Equation:

$$V = [\sum_{i=1}^{i=n} \left(\frac{A_i \times B_i}{2000} \right) \times \left(\frac{UEF_i}{2000} \right)] + C + D$$

where:
V = total VOC emissions from the open molding operations (tons/month)

n = number of resins or gel coats used at the open molding operations during the month
A_i = Density (lb/gal resin or gel)
B_i = Gallons of resin or gel used at the open molding operations during the month (gallons/month)
UEF_i = Unified Emission Factor for Open Molding of Composites (lb monomer/ton resin or gel)
i = type of resin or gel
2000 = conversion factor (lbs/ton)
C = VOC input at the open molding operations during the month due to catalyst usage (tons/month)
D = VOC input at the open molding operations during the month due to solvent usage (tons/month)

(b) Closed Molding Operations:

The total VOC emissions from the close molding emission operations listed below shall be determined using the equation followed by these lists.

Plant 1
(i) resin transfer molding (RTM) area

Plant 3
(i) resin transfer closed molding unit (RTM1)

Equation:

$$V = [\sum_{i=1}^{i=n} (A_i \times Bi \times C_i) \times \left(\frac{EF_i}{2000}\right)] + C + D$$

where:
V = total VOC emissions from the close molding operations (tons/month)
n = number of resins or gel coats used at the close molding operations during the month
A_i = Density (lb/gal resin or gel)
B_i = Weight % monomer
C_i = Gallons of resin or gel used at the open molding operations during the month (gallons/month)
EF_i = Emission Factor for Close Molding of Composites (3 lb monomer emitted/100 lb monomer used)
2000 = conversion factor (lbs/ton)
C = VOC input at the close molding operations during the month due to catalyst usage (tons/month)
D = VOC input at the close molding operations during the month due to solvent usage (tons/month)

(c) Resin booth (P1-R2) and Gel Coat booth (P1-G3)

The total single HAP emissions from the resin booth (P1-R2) and gel coat booth (P1-G3) shall be determined using the following equation:

$$SH = [\sum_{i=1}^{i=n} \left(\frac{A_i \times B_i}{2000}\right) \times \left(\frac{UEF_i}{2000}\right)] + C + D$$

where:
SH = total single HAP emissions (tons/month)
n = number of resins or gel coats used at P1-R2 and P1-G3 during the month
A_i = Density (lb/gal resin or gel)
B_i = Gallons of resin or gel used at P1-R2 and P1-G3 during the month (gallons/month)
UEF_i = Unified Emission Factor for Open Molding of Composites (lb monomer/ton resin or gel)
i = type of resin or gel
2000 = conversion factor (lbs/ton)
C = single HAP input at P1-R2 and P1-G3 due to catalyst usage (tons/month)
D = single HAP input at P1-R2 and P1-G3 due to solvent usage (tons/month)

(d) Monthly usage by weight, monomer content, method of application, and other emission reduction techniques for each solvent, gel coat, and resin shall be recorded. VOC and HAPs emissions shall be calculated by multiplying the usage of each gel coat and resin by the emission factor that is appropriate for the monomer content, method of application, and other emission reduction techniques for each gel coat and resin, and summing the emissions for all gel coats and resins. Emission factors shall be obtained from the reference approved by IDEM, OAQ.

(e) Until such time that new emissions information is available by U.S. EPA in its AP-42 document or other U.S. EPA-approved form, emission factors shall be taken from the following reference approved by IDEM, OAQ: "Unified Emission Factors for Open Molding of Composites", October 13, 2009, or its updates, with the exception of the emission factors for controlled spray application. For VOC and HAPs emitting operations not addressed by this reference, emission factors shall be taken from U.S. EPA's AP-42 document. For the purposes of these emission calculations, HAP monomer in resins and gel coats that is not styrene or methyl methacrylate shall be considered as styrene on an equivalent weight basis.

(f) The VOC and HAPs content in each resin, gel coat, catalyst, solvent and mold release agent shall be determined by any of the following:

(i) The manufacturer's certified product data sheet.

(ii) The manufacturer's material safety data sheet.

(iii) Sampling and analysis, using any of the following test methods, as applicable:

(1) 40 CFR 60, Method 24, Appendix A (July 1, 1998), shall be used to measure the total volatile HAP and volatile organic compound (VOC) content of resins and gel coats. Method 24 may be modified for measuring the volatile HAP content of resins or gel coats to require that the procedure be performed on uncatalyzed resin or gel coat samples.

(2) 40 CFR 63, Method 311, Appendix A (July 1, 1998), shall be used to measure HAP content in resins and gel coats by direct injection into a gas chromatograph.

(iv) An alternate method approved by IDEM, OAQ.

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

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

D.1.9 Monitoring

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

S1, S2, S3, S4, S11, S12, S16, P1-R4S1, P1-R4S2, and MS1-S

while one or more of the associated booth to these stacks is in operation. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

(b) Monthly inspections shall be performed of the emissions from the following Stacks:

S1, S2, S3, S4, S11, S12, S16, P1-R4S1, P1-R4S2, and MS1-S

and the presence of overspray on the rooftops and the nearby ground. 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.

The above mentioned monitoring for the following Stacks: S4, S11, and S12, are also required under 40 CFR 64 (CAM).

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

D.1.10 Record Keeping Requirements

(a) To document the compliance status with Conditions D.1.1, D.1.2 and D.1.3, the Permittee shall maintain records in accordance with (1) through (8) below. Records maintained for (1) through (7) shall be taken monthly and shall be complete and sufficient to establish compliance with VOC and HAP monomer usage limits and/or the VOC and HAP monomer emission limits established in Conditions D.1.1, D.1.2 and D.1.3. Records necessary to demonstrate compliance shall be available within thirty (30) days of the end of each compliance period.

(1) The usage by weight and monomer content of each resin and gel coat used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used and calculations necessary to verify the type, amount used, and HAP content of each resin or gel coat. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the dates of use;

(3) The non-acetone cleanup solvent usage for each month;

(4) The total VOC usage for each month; and

(5) The weight of VOCs emitted for each compliance period.

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

(7) Monthly calculations demonstrating compliance based on a weighted average method for the organic HAP content if non-compliant resins or gel coats are used during that month.

(8) Monthly calculations of HAPs emitted.

(b) To document the compliance status with Condition D.1.2(b)(5) and D.1.7 the Permittee shall maintain the following training records:

(1) A copy of the current training program.

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

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

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

D.1.11 Reporting Requirements

A quarterly summary of the information to document the compliance status with Conditions D.1.1, D.1.2 and D.1.3 shall be submitted 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(34).

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Plant 1:

(i) One (1) grinding booth, identified as P1-GRIND, with one (1) hand grinder, constructed in 1998, with a maximum capacity of 7.5 fiberglass parts or 612 pounds of fiberglass parts per hour, using dry filters for particulate control, exhausting to Stacks S9, S10, and S14.

Plant 2:

(d) One (1) grinding booth, identified as P2-MSGRIND1, constructed in 2015, with a maximum capacity of 500 pounds of molds per hour, using dry filters for particulate control, exhausting inside the building.

Plant 5:

(f) One (1) grinding booth with a maximum of four (4) grinders, identified as P5-GRIND#1, constructed in 2007, with a maximum capacity of 504 pounds of fiberglass parts per hour, equipped with dry filters for particulate control, exhausting to Stack S5.

(g) One (1) grinding booth with a maximum of four (4) grinders, identified as P5-GRIND#2, constructed in 1996, with a maximum capacity of 216 pounds of fiberglass parts per hour, using dry filters for particulate control, exhausting to Stack S6.

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

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

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

Pursuant to 326 IAC 6-3-2(e), the particulate from grinding operations shall be limited by the following:

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

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

The process weight rates and corresponding emissions limits are as follows:

Emission Unit	Process Weight Rate (tons/hour)	Maximum Allowable Emission Rate (lbs/hour)
P1-GRIND	0.306	1.85
P5-GRIND#1	0.252	1.63
P5-GRIND#2	0.108	0.923
P2-MSGRIND1	0.25	1.62

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

In order to render 326 IAC 2-2 not applicable, the PM, PM10 and PM2.5 emissions after control

from the facilities listed in the table below shall not exceed specified limit:

Emission Unit	PM limit (lbs/hr)	PM10 limit (lbs/hr)	PM2.5 limit (lbs/hr)
Grinding Booth (P1-GRIND)	0.38	0.38	0.38
Grinding Booth (P5-GRIND#1)	0.26	0.26	0.26
Grinding Booth (P5-GRIND#2)	0.11	0.11	0.11

Compliance with the above limits in conjunction with Condition D.1.4 and unlimited particulate emissions from all other emission units at the source will limit the source-wide PM, PM10, and PM2.5 emissions, each, less than 250 tons per year. Therefore, this is a minor source under 326 IAC 2-2.

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

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

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

D.2.4 Particulate Matter (PM)

(a) In order to comply with Conditions D.2.1 and D.2.2, the dry filters for PM, PM10, PM2.5 control shall be in operation at all times when the grinding booth, identified as P1-GRIND, is in operation.

(b) In order to comply with Conditions D.2.1and D.2.2, the dry filters for PM, PM10, PM2.5 control shall be in operation at all times when the grinding booth, identified as P5-GRIND#1, and/or the grinding booth, identified as P5-GRIND#2, is in operation.

(c) In order to comply with Conditions D.2.1, the dry filters for PM, PM10, PM2.5 control shall be in operation at all times when the grinding booth, identified as P2-MSGRIND1 is in operation.

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

D.2.5 Visible Emissions Notations

(a) Visible emission notations of the following:

(1) P1-GRIND stack exhausts S9, S10 and S14,
(2) P5-GRIND#1 stack exhaust S5 and
(3) P5-GRIND#2 stack exhaust S6

shall be performed once per day during normal daylight operations.

A trained employee shall record whether emissions are normal or abnormal.

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

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

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

for that specific process.

(e) If abnormal emissions are observed, the Permittee shall take reasonable response steps. Section C – Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

The above mentioned monitoring for the P1-GRIND Stacks S9, S10 and S14, are also required under 40 CFR 64 (CAM).

D.2.6 Particulate Filter Inspections

An inspection shall be performed each calendar quarter of all filters controlling the grinding booth P2-MSGRIND1 while in operation. All defective filters shall be replaced.

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

D.2.7 Record Keeping Requirements

(a) To document the compliance status with Condition D.2.5, the Permittee shall maintain records of visible emission notations of the following:

(1) P1-GRIND stack exhausts S9, S10 and S14,
(2) P5-GRIND#1 stack exhaust S5 and
(3) P5-GRIND#2 stack exhaust S6.

The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation, (i.e. the process did not operate that day).

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

SECTION E.1 NESHAP

Emissions Unit Description:

Plant 1:

(a) One (1) gel coat booth, identified as P1-G1, constructed in 1998, with a maximum capacity of 7.5 fiberglass parts per hour and 2.69 gallons of gel coat per part, equipped with a mechanical air-assisted airless spray applicator and dry filters for overspray control, exhausting to Stack S11.

Under NESHAP 40 CFR 63, Subpart WWWW, this facility is considered an existing open molding process and is part of an existing affected reinforced plastic composites production source.

(b) One (1) gel coat booth, identified as P1-G2, constructed in 2003, with a maximum capacity of 7.5 fiberglass parts per hour and 2.69 gallons of gel coat per part, equipped with a mechanical air-assisted airless spray applicator and dry filters for overspray control, exhausting to Stack S12.

Under NESHAP 40 CFR 63, Subpart WWWW, this facility is considered an existing open molding process and is part of an existing affected reinforced plastic composites production source.

(c) One (1) resin booth, identified as P1-R, constructed in 1998, with a maximum capacity of 7.5 fiberglass parts per hour and 7.96 gallons of resin per part, equipped with a mechanical fluid impingement applicator and dry filters for overspray control, exhausting to Stack S13.

Under NESHAP 40 CFR 63, Subpart WWWW, this facility is considered an existing open molding process and is part of an existing affected reinforced plastic composites production source.

(d) One (1) gel coat booth, identified as P1-G3, constructed in 2005, with a maximum capacity of 20 small fiberglass parts per hour and 0.05 gallons of gel coat per part , equipped with a mechanical air-assisted airless spray applicator and dry filters for overspray control, exhausting to Stack S16.

Under NESHAP 40 CFR 63, Subpart WWWW, this facility is considered an existing open molding process and is part of an existing affected reinforced plastic composites production source.

(e) One (1) resin booth, identified as P1-R2, constructed in 2005, with a maximum capacity of 20 small fiberglass parts per hour and 0.40 gallons of resin per part, equipped with a mechanical fluid impingement applicator and dry filters for overspray control, exhausting to Stack S15.

Under NESHAP 40 CFR 63, Subpart WWWW, this facility is considered an existing open molding process and is part of an existing affected reinforced plastic composites production source.

(f) One (1) resin transfer molding (RTM) area, constructed in 2003, utilizing an injection, closed molding process and 30,000 pounds of styrene resins per year, with a maximum capacity of one (1) fiberglass part per hour and 0.35 gallons of resin per part, uncontrolled, exhausting indoors.

Under NESHAP 40 CFR 63, Subpart WWWW, this facility is considered an existing closed molding process and is part of an existing affected reinforced plastic composites production source.

(g) One (1) final finish area, identified as P1-FF, constructed in 1998, uncontrolled, exhausting indoors, consisting of the following:

(1) Gel coat and resin application with catalyst utilizing manual application methods (hand and hand wiping), with a maximum capacity of 7.5 fiberglass parts per hour, using 0.016 gallons of gel coat per part, and 0.025 gallons of resin per part.

Under NESHAP 40 CFR 63, Subpart WWWW, this facility is considered an existing open molding process and is part of an existing affected reinforced plastic composites production source.

(h) One (1) assembly operation, identified as P1-AO, constructed in 1998, with a maximum capacity of 7.5 fiberglass parts per hour and 0.003 gallons of adhesive, caulk, and cleaner per part, utilizing manual application methods (hand wiping) and equipped with a HVLP spray applicator, uncontrolled, exhausting indoors.

Under NESHAP 40 CFR 63, Subpart WWWW, this facility is considered an existing open molding process and is part of an existing affected reinforced plastic composites production source.

(k) One (1) resin application booth, identified as P1-R4, constructed in 2015, with a maximum capacity of 7.5 fiberglass parts per hour and 7.96 gallons of resin per part, equipped with two (2) mechanical fluid impingement applicators and dry filters for overspray control, exhausting to Stacks P1-R4S1 and P1-R4S2.

Under NESHAP 40 CFR 63, Subpart WWWW, this facility is considered an existing open molding process and is part of an existing affected reinforced plastic composites production source.

Plant 2:

(a) One (1) gel coat booth, identified as P2-MSGG1, constructed in 2015, with a maximum capacity of 0.25 molds per hour and 1.22 gallons of gel coat per mold, equipped with HVLP gel coat application, using dry filter bank for particulate control, exhausting to Stack MS1-S.

Under NESHAP 40 CFR 63, Subpart WWWW, this facility is considered an existing open molding process and is part of an existing affected reinforced plastic composites production source.

(b) One (1) FIT chop booth, identified as P2-MSCG1, constructed in 2015, with a maximum capacity of 0.25 molds per hour and 9.6 gallons of resin per mold, using dry filter bank for particulate control, exhausting to Stack MS2-S.

Under NESHAP 40 CFR 63, Subpart WWWW, this facility is considered an existing open molding process and is part of an existing affected reinforced plastic composites production source.

Plant 3:

(a) One (1) resin transfer closed molding unit, identified as RTM1, installed in 2010, with a throughput capacity of five (5) parts per hour and 0.60 gallons of resin per part, utilizing mechanical non-atomized resin application method, uncontrolled, exhausting indoors.

Under NESHAP 40 CFR 63, Subpart WWWW, this facility is considered an existing closed molding process and is part of an existing affected reinforced plastic composites production source.

Plant 5:

(a) One (1) gel coat booth, identified as P5-G, constructed in 1996, with a maximum capacity of 7.5 fiberglass parts per hour and 1.79 gallons of gel coat per part, equipped with a mechanical air-

assisted airless spray applicator and dry filters for overspray control, exhausting to Stack S4.

Under NESHAP 40 CFR 63, Subpart WWWW, this facility is considered an existing open molding process and is part of an existing affected reinforced plastic composites production source.

(b) One (1) resin chop area, identified as P5-R, constructed in 1996, with a maximum capacity of 7.5 fiberglass parts per hour and 4.44 gallons of resin per part, equipped with a mechanical fluid impingement applicator and dry filters for overspray control, exhausting to Stacks S7 and S8.

Under NESHAP 40 CFR 63, Subpart WWWW, this facility is considered an existing open molding process and is part of an existing affected reinforced plastic composites production source.

(c) One (1) gel coat/resin chop application area, identified as P5-LTGR, constructed in 2003, with a maximum capacity of 7.5 fiberglass parts per hour, using 0.061 gallons of gel coat per part and 1.05 gallons of resin per part, equipped with a mechanical non-atomized applicator and dry filters for overspray control, exhausting to Stacks S2 and S3.

Under NESHAP 40 CFR 63, Subpart WWWW, this facility is considered an existing open molding process and is part of an existing affected reinforced plastic composites production source.

(d) One (1) final finish area, identified as P5-FF, constructed in 1996, uncontrolled, exhausting indoors, consisting of the following:

(1) Gel coat and resin application with catalyst utilizing manual application methods (hand and hand wiping), with a maximum capacity of 7.5 fiberglass parts per hour, using 0.02 gallons of gel coat per part, and 0.3 gallons of resin per part.

Under NESHAP 40 CFR 63, Subpart WWWW, this facility is considered an existing open molding process and is part of an existing affected reinforced plastic composites production source.

(e) One (1) assembly operation, identified as P5-AO, constructed in 1996, with a maximum capacity of 7.5 fiberglass parts per hour and 0.003 gallons of adhesive, caulk, and cleaner per part, utilizing manual application methods (hand wiping) and equipped with a HVLP spray applicator, uncontrolled, exhausting indoors.

Under NESHAP 40 CFR 63, Subpart WWWW, this facility is considered an existing open molding process and is part of an existing affected reinforced plastic composites production source.

Specifically Regulated Insignificant Activities:

(g) Plant 1:

(1) One (1) 5,581.45 gallon above ground vertical fixed roof resin storage tank, identified as P1-RT1, constructed on 3/5/1998, and one (1) enclosed, in-line sheer mixing tank, identified as P1-R2SM, constructed on 5/9/2005.

Under NESHAP 40 CFR 63, Subpart WWWW, this facility is considered an existing HAP storage/mixing tank and is part of an existing affected reinforced plastic composites production source.

(i) Plant 3:

(1) One (1) tooling gel coat and resin operation, consisting of one (1) booth, identified as P3-R/G, constructed in 1996 and 1997, with a total maximum capacity of 0.10 fiberglass parts per hour, using 1.22 gallons of gel coat per part and 13.7 gallons of resin per part, equipped with a high efficiency air-atomized applicator for the gel coat operation and equipped with an airless spray applicator and manual application for resins, using dry filters for control, exhausting to Stack S1.

Under NESHAP 40 CFR 63, Subpart WWWW, this facility is considered an existing open molding process and is part of an existing affected reinforced plastic composites production source.

(j) Plant 5:

(1) One (1) 5,581.45 gallon above ground vertical fixed roof resin storage tank, identified as P5-RT1, constructed in 2015, and two (2) enclosed, in-line sheer mixing tanks, identified as P5-RSM1 and P5-RSM2, constructed in 2015.

Under NESHAP 40 CFR 63, Subpart WWWW, this facility is considered an existing HAP storage/mixing tank and is part of an existing affected reinforced plastic composites production source.

(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 National Emission Standards for Hazardous Air Pollutants under 40 CFR Part 63 [326 IAC 20-1][40 CFR Part 63, Subpart A]

(a) Pursuant to 40 CFR 63.1 the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 20-1, for the emission units listed above, except as otherwise specified in 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 Reinforced Plastics Composites Production NESHAP [40 CFR Part 63, Subpart WWWW][326 IAC 20-56]

The Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart WWWW (included as Attachment A to the operating permit), which are incorporated by reference as 326 IAC 20-56, for the emission unit(s) listed above:

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

(5) 40 CFR 63.5796
(6) 40 CFR 63.5797
(7) 40 CFR 63.5798
(8) 40 CFR 63.5799(b)
(9) 40 CFR 63.5800
(10) 40 CFR 63.5805(b) and (g)
(11) 40 CFR 63.5810(a)-(d)
(12) 40 CFR 63.5835(a)
(13) 40 CFR 63.5835(c)
(14) 40 CFR 63.5840
(15) 40 CFR 63.5860(a)
(16) 40 CFR 63.5895(c) and (d)
(17) 40 CFR 63.5900(a)(2)-(4)
(18) 40 CFR 63.5900(b) and (c)
(19) 40 CFR 63.5905
(20) 40 CFR 63.5910(a), (b), (c)(1)-(3), (5)
(21) 40 CFR 63.5910(d), (g), (h), and (i)
(22) 40 CFR 63.5915(a)(1), (c), and (d)
(23) 40 CFR 63.5920
(24) 40 CFR 63.5925
(25) 40 CFR 63.5930
(26) 40 CFR 63.5935
(27) Tables 1, 3, 4, 7, 8, 9, 13, and 14 of Subpart WWWW (applicable portions)

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

Source Name: Patrick Industries, Inc. d/b/a Better Way Products
Source Address: 70891 and 71103 County Road 23, New Paris, Indiana 46553
Part 70 Permit No.: T039-37292-00141

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: Patrick Industries, Inc. d/b/a Better Way Products
Source Address: 70891 and 71103 County Road 23, New Paris, Indiana 46553
Part 70 Permit No.: T039-37292-00141

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:

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: Patrick Industries, Inc. d/b/a Better Way Products
Source Address: 70891 and 71103 County Road 23, New Paris, Indiana 46553
Part 70 Permit No.: T039-37292-00141
Facility: Emission units listed in Condition D.1.1.
Parameter: VOC emissions
Limit: Limited to less than a total of 244.5 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

QUARTER : _____ YEAR: _____

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

☐ 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: Patrick Industries, Inc. d/b/a Better Way Products
Source Address: 70891 and 71103 County Road 23, New Paris, Indiana 46553
Part 70 Permit No.: T039-37292-00141
Facility: Gelcoat booth P1-G1 and resin booth P1-R
Parameter: VOC emissions
Limit: Limited to less than a total of 228 tons per twelve (12) consecutive month period with compliance determined at the end of each month (Condition D.1.2 (a))

QUARTER : _____ YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	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: Patrick Industries, Inc. d/b/a Better Way Products
Source Address: 70891 and 71103 County Road 23, New Paris, Indiana 46553
Part 70 Permit No.: T039-37292-00141
Facility: Resin booth P1-R2 and gelcoat booth P1-G3
Parameter: Single HAP emissions
Limit: Limited to less than a total of ten (10) tons per twelve (12) consecutive month period, with compliance determined at the end of each month. (Condition D.1.3)

QUARTER : _____ YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	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 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Patrick Industries, Inc. d/b/a Better Way Products
Source Address: 70891 and 71103 County Road 23, New Paris, Indiana 46553
Part 70 Permit No.: T039-37292-00141

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:	

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: _____

Attachment A

Part 70 Operating Permit No: T039-37292-00141

[Downloaded from the eCFR on May 15, 2013]

Electronic Code of Federal Regulations

Title 40: Protection of Environment

PART 63—NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS FOR SOURCE CATEGORIES

Subpart WWWW—National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production

Source: 68 FR 19402, Apr. 21, 2003, unless otherwise noted.

What This Subpart Covers

§ 63.5780 What is the purpose of this subpart?

This subpart establishes national emissions standards for hazardous air pollutants (NESHAP) for reinforced plastic composites production. This subpart also establishes requirements to demonstrate initial and continuous compliance with the hazardous air pollutants (HAP) emissions standards.

§ 63.5785 Am I subject to this subpart?

(a) You are subject to this subpart if you own or operate a reinforced plastic composites production facility that is located at a major source of HAP emissions. Reinforced plastic composites production is limited to operations in which reinforced and/or nonreinforced plastic composites or plastic molding compounds are manufactured using thermoset resins and/or gel coats that contain styrene to produce plastic composites. The resins and gel coats may also contain materials designed to enhance the chemical, physical, and/or thermal properties of the product. Reinforced plastic composites production also includes cleaning, mixing, HAP-containing materials storage, and repair operations associated with the production of plastic composites.

(b) You are not subject to this subpart if your facility only repairs reinforced plastic composites. Repair includes the non-routine manufacture of individual components or parts intended to repair a larger item as defined in § 63.5935

(c) You are not subject to this subpart if your facility is a research and development facility as defined in section 112(c)(7) of the Clean Air Act (CAA).

(d) You are not subject to this subpart if your reinforced plastic composites operations use less than 1.2 tons per year (tpy) of thermoset resins and gel coats that contain styrene combined.

§ 63.5787 What if I also manufacture fiberglass boats or boat parts?

(a) If your source meets the applicability criteria in § 63.5785, and is not subject to the Boat Manufacturing NESHAP (40 CFR part 63, subpart VVVV), you are subject to this subpart regardless of the final use of the parts you manufacture.

(b) If your source is subject to 40 CFR part 63, subpart VVVV, and all the reinforced plastic composites you manufacture are used in manufacturing your boats, you are not subject to this subpart.

(c) If you are subject to 40 CFR part 63, subpart VVVV, and meet the applicability criteria in § 63.5785, and produce reinforced plastic composites that are not used in fiberglass boat manufacture at your facility, all operations

associated with the manufacture of the reinforced plastic composites parts that are not used in fiberglass boat manufacture at your facility are subject to this subpart, except as noted in paragraph (d) of this section.

(d) Facilities potentially subject to both this subpart and 40 CFR part 63, subpart VVVV may elect to have the operations in paragraph (c) of this section covered by 40 CFR part 63, subpart VVVV, in lieu of this subpart, if they can demonstrate that this will not result in any organic HAP emissions increase compared to complying with this subpart.

§ 63.5790 What parts of my plant does this subpart cover?

(a) This subpart applies to each new or existing affected source at reinforced plastic composites production facilities.

(b) The affected source consists of all parts of your facility engaged in the following operations: Open molding, closed molding, centrifugal casting, continuous lamination, continuous casting, polymer casting, pultrusion, sheet molding compound (SMC) manufacturing, bulk molding compound (BMC) manufacturing, mixing, cleaning of equipment used in reinforced plastic composites manufacture, HAP-containing materials storage, and repair operations on parts you also manufacture.

(c) The following operations are specifically excluded from any requirements in this subpart: application of mold sealing and release agents; mold stripping and cleaning; repair of parts that you did not manufacture, including non-routine manufacturing of parts; personal activities that are not part of the manufacturing operations (such as hobby shops on military bases); prepreg materials as defined in § 63.5935; non-gel coat surface coatings; application of putties, polyputties, and adhesives; repair or production materials that do not contain resin or gel coat; research and development operations as defined in section 112(c)(7) of the CAA; polymer casting; and closed molding operations (except for compression/injection molding). Note that the exclusion of certain operations from any requirements applies only to operations specifically listed in this paragraph. The requirements for any co-located operations still apply.

(d) Production resins that must meet military specifications are allowed to meet the organic HAP limit contained in that specification. In order for this exemption to be used, you must supply to the permitting authority the specifications certified as accurate by the military procurement officer, and those specifications must state a requirement for a specific resin, or a specific resin HAP content. Production resins for which this exemption is used must be applied with nonatomizing resin application equipment unless you can demonstrate this is infeasible. You must keep a record of the resins for which you are using this exemption.

[68 FR 19402, Apr. 21, 2003, as amended at 70 FR 50124, Aug. 25, 2005]

§ 63.5795 How do I know if my reinforced plastic composites production facility is a new affected source or an existing affected source?

(a) A reinforced plastic composites production facility is a new affected source if it meets all the criteria in paragraphs (a)(1) and (2) of this section.

(1) You commence construction of the source after August 2, 2001.

(2) You commence construction, and no other reinforced plastic composites production source exists at that site.

(b) For the purposes of this subpart, an existing affected source is any affected source that is not a new affected source.

[70 FR 50124, Aug. 25, 2005]

Calculating Organic HAP Emissions Factors for Open Molding and Centrifugal Casting

§ 63.5796 What are the organic HAP emissions factor equations in Table 1 to this subpart, and how are they used in this subpart?

Emissions factors are used in this subpart to determine compliance with certain organic HAP emissions limits in Tables 3 and 5 to this subpart. You may use the equations in Table 1 to this subpart to calculate your emissions factors. Equations are available for each open molding operation and centrifugal casting operation and have units of pounds of organic HAP emitted per ton (lb/ton) of resin or gel coat applied. These equations are intended to provide a method for you to demonstrate compliance without the need to conduct for a HAP emissions test. In lieu of these equations, you can elect to use site-specific organic HAP emissions factors to demonstrate compliance provided your site-specific organic HAP emissions factors are incorporated in the facility's air emissions permit and are based on actual facility HAP emissions test data. You may also use the organic HAP emissions factors calculated using the equations in Table 1 to this subpart, combined with resin and gel coat use data, to calculate your organic HAP emissions.

§ 63.5797 How do I determine the organic HAP content of my resins and gel coats?

In order to determine the organic HAP content of resins and gel coats, you may rely on information provided by the material manufacturer, such as manufacturer's formulation data and material safety data sheets (MSDS), using the procedures specified in paragraphs (a) through (c) of this section, as applicable.

(a) Include in the organic HAP total each organic HAP that is present at 0.1 percent by mass or more for Occupational Safety and Health Administration-defined carcinogens, as specified in 29 CFR 1910.1200(d)(4) and at 1.0 percent by mass or more for other organic HAP compounds.

(b) If the organic HAP content is provided by the material supplier or manufacturer as a range, you must use the upper limit of the range for determining compliance. If a separate measurement of the total organic HAP content, such as an analysis of the material by EPA Method 311 of appendix A to 40 CFR part 63, exceeds the upper limit of the range of the total organic HAP content provided by the material supplier or manufacturer, then you must use the measured organic HAP content to determine compliance.

(c) If the organic HAP content is provided as a single value, you may use that value to determine compliance. If a separate measurement of the total organic HAP content is made and is less than 2 percentage points higher than the value for total organic HAP content provided by the material supplier or manufacturer, then you still may use the provided value to demonstrate compliance. If the measured total organic HAP content exceeds the provided value by 2 percentage points or more, then you must use the measured organic HAP content to determine compliance.

§ 63.5798 What if I want to use, or I manufacture, an application technology (new or existing) whose organic HAP emissions characteristics are not represented by the equations in Table 1 to this subpart?

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

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

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

§ 63.5799 How do I calculate my facility's organic HAP emissions on a tpy basis for purposes of determining which paragraphs of § 63.5805 apply?

To calculate your facility's organic HAP emissions in tpy for purposes of determining which paragraphs in § 63.5805 apply to you, you must use the procedures in either paragraph (a) of this section for new facilities prior to startup, or paragraph (b) of this section for existing facilities and new facilities after startup. You are not required to calculate or report emissions under this section if you are an existing facility that does not have centrifugal casting or continuous lamination/casting operations, or a new facility that does not have any of the following operations: Open molding, centrifugal casting, continuous lamination/casting, pultrusion, SMC and BMC manufacturing, and mixing. Emissions calculation and emission reporting procedures in other sections of this subpart still apply. Calculate organic HAP emissions prior to any add-on control device, and do not include organic HAP emissions from any resin or gel coat used in operations subject to the Boat Manufacturing NESHAP, 40 CFR part 63, subpart VVVV, or from the manufacture of large parts as defined in § 63.5805(d)(2). For centrifugal casting operations at existing facilities, do not include any organic HAP emissions where resin or gel coat is applied to an open centrifugal mold using open molding application techniques. Table 1 and the Table 1 footnotes to this subpart present more information on calculating centrifugal casting organic HAP emissions. The timing and reporting of these calculations is discussed in paragraph (c) of this section.

(a) For new facilities prior to startup, calculate a weighted average organic HAP emissions factor for the operations specified in § 63.5805(c) and (d) on a lbs/ton of resin and gel coat basis. Base the weighted average on your projected operation for the 12 months subsequent to facility startup. Multiply the weighted average organic HAP emissions factor by projected resin use over the same period. You may calculate your organic HAP emissions factor based on the factors in Table 1 to this subpart, or you may use any HAP emissions factor approved by us, such as factors from the “Compilation of Air Pollutant Emissions Factors, Volume I: Stationary Point and Area Sources (AP-42),” or organic HAP emissions test data from similar facilities.

(b) For existing facilities and new facilities after startup, you may use the procedures in either paragraph (b)(1) or (2) of this section. If the emission factors for an existing facility have changed over the period of time prior to their initial compliance date due to incorporation of pollution-prevention control techniques, existing facilities may base the average emission factor on their operations as they exist on the compliance date. If an existing facility has accepted an enforceable permit limit that would result in less than 100 tpy of HAP measured prior to any add-on controls, and can demonstrate that they will operate at that level subsequent to the compliance date, they can be deemed to be below the 100 tpy threshold.

(1) *Use a calculated emission factor.* Calculate a weighted average organic HAP emissions factor on a lbs/ton of resin and gel coat basis. Base the weighted average on the prior 12 months of operation. Multiply the weighted average organic HAP emissions factor by resin and gel coat use over the same period. You may calculate this organic HAP emissions factor based on the equations in Table 1 to this subpart, or you may use any organic HAP emissions factor approved by us, such as factors from AP-42, or site-specific organic HAP emissions factors if they are supported by HAP emissions test data.

(2) *Conduct performance testing.* Conduct performance testing using the test procedures in § 63.5850 to determine a site-specific organic HAP emissions factor in units of lbs/ton of resin and gel coat used. Conduct the test under conditions expected to result in the highest possible organic HAP emissions. Multiply this factor by annual resin and gel coat use to determine annual organic HAP emissions. This calculation must be repeated and reported annually.

(c) Existing facilities must initially perform this calculation based on their 12 months of operation prior to April 21, 2003, and include this information with their initial notification report. Existing facilities must repeat the calculation based on their resin and gel coat use in the 12 months prior to their initial compliance date, and submit this information with their initial compliance report. After their initial compliance date, existing and new facilities must recalculate organic HAP emissions over the 12-month period ending June 30 or December 31, whichever date is the first date following their compliance date specified in § 63.5800. Subsequent calculations should cover the periods in the semiannual compliance reports.

[68 FR 19402, Apr. 21, 2003, as amended at 70 FR 50124, Aug. 25, 2005]

Compliance Dates and Standards

§ 63.5800 When do I have to comply with this subpart?

You must comply with the standards in this subpart by the dates specified in Table 2 to this subpart. Facilities meeting an organic HAP emissions standard based on a 12-month rolling average must begin collecting data on the compliance date in order to demonstrate compliance.

§ 63.5805 What standards must I meet to comply with this subpart?

You must meet the requirements of paragraphs (a) through (h) of this section that apply to you. You may elect to comply using any options to meet the standards described in §§ 63.5810 through 63.5830. Use the procedures in § 63.5799 to determine if you meet or exceed the 100 tpy threshold.

(a) If you have an existing facility that has any centrifugal casting or continuous casting/lamination operations, you must meet the requirements of paragraph (a)(1) or (2) of this section:

(1) If the combination of all centrifugal casting and continuous lamination/casting operations emit 100 tpy or more of HAP, you must reduce the total organic HAP emissions from centrifugal casting and continuous lamination/casting operations by at least 95 percent by weight. As an alternative to meeting the 95 percent by weight requirement, centrifugal casting operations may meet the applicable organic HAP emissions limits in Table 5 to this subpart and continuous lamination/casting operations may meet an organic HAP emissions limit of 1.47 lbs/ton of neat resin plus and neat gel coat plus applied. For centrifugal casting, the percent reduction requirement does not apply to organic HAP emissions that occur during resin application onto an open centrifugal casting mold using open molding application techniques.

(2) If the combination of all centrifugal casting and continuous lamination/casting operations emit less than 100 tpy of HAP, then centrifugal casting and continuous lamination/casting operations must meet the appropriate requirements in Table 3 to this subpart.

(b) All operations at existing facilities not listed in paragraph (a) of this section must meet the organic HAP emissions limits in Table 3 to this subpart and the work practice standards in Table 4 to this subpart that apply, regardless of the quantity of HAP emitted.

(c) If you have a new facility that emits less than 100 tpy of HAP from the combination of all open molding, centrifugal casting, continuous lamination/casting, pultrusion, SMC manufacturing, mixing, and BMC manufacturing, you must meet the organic HAP emissions limits in Table 3 to this subpart and the work practice standards in Table 4 to this subpart that apply to you.

(d)(1) Except as provided in paragraph (d)(2) of this section, if you have a new facility that emits 100 tpy or more of HAP from the combination of all open molding, centrifugal casting, continuous lamination/casting, pultrusion, SMC manufacturing, mixing, and BMC manufacturing, you must reduce the total organic HAP emissions from these operations by at least 95 percent by weight and meet any applicable work practice standards in Table 4 to this subpart that apply to you. As an alternative to meeting 95 percent by weight, you may meet the organic HAP emissions limits in Table 5 to this subpart. If you have a continuous lamination/casting operation, that operation may alternatively meet an organic HAP emissions limit of 1.47 lbs/ton of neat resin plus and neat gel coat plus applied.

(2)(i) If your new facility manufactures large reinforced plastic composites parts using open molding or pultrusion operations, the specific open molding and pultrusion operations used to produce large parts are not required to reduce HAP emissions by 95 weight percent, but must meet the emission limits in Table 3 to this subpart.

(ii) A large open molding part is defined as a part that, when the final finished part is enclosed in the smallest rectangular six-sided box into which the part can fit, the total interior volume of the box exceeds 250 cubic feet, or any interior sides of the box exceed 50 square feet.

(iii) A large pultruded part is a part that exceeds an outside perimeter of 24 inches or has more than 350 reinforcements.

(e) If you have a new or existing facility subject to paragraph (a)(2) or (c) of this section at its initial compliance date that subsequently meets or exceeds the 100 tpy threshold in any calendar year, you must notify your permitting authority in your compliance report. You may at the same time request a one-time exemption from the requirements of paragraph (a)(1) or (d) of this section in your compliance report if you can demonstrate all of the following:

(1) The exceedance of the threshold was due to circumstances that will not be repeated.

(2) The average annual organic HAP emissions from the potentially affected operations for the last 3 years were below 100 tpy.

(3) Projected organic HAP emissions for the next calendar year are below 100 tpy, based on projected resin and gel coat use and the HAP emission factors calculated according to the procedures in § 63.5799.

(f) If you apply for an exemption in paragraph (e) of this section and subsequently exceed the HAP emission thresholds specified in paragraph (a)(2) or (c) of this section over the next 12-month period, you must notify the permitting authority in your semiannual report, the exemption is removed, and your facility must comply with paragraph (a)(1) or (d) of this section within 3 years from the time your organic HAP emissions first exceeded the threshold.

(g) If you have repair operations subject to this subpart as defined in § 63.5785, these repair operations must meet the requirements in Tables 3 and 4 to this subpart and are not required to meet the 95 percent organic HAP emissions reduction requirements in paragraph (a)(1) or (d) of this section.

(h) If you use an add-on control device to comply with this subpart, you must meet all requirements contained in 40 CFR part 63, subpart SS.

[70 FR 50124, Aug. 25, 2005]

Options for Meeting Standards

§ 63.5810 What are my options for meeting the standards for open molding and centrifugal casting operations at new and existing sources?

You must use one of the following methods in paragraphs (a) through (d) of this section to meet the standards for open molding or centrifugal casting operations in Table 3 or 5 to this subpart. You may use any control method that reduces organic HAP emissions, including reducing resin and gel coat organic HAP content, changing to nonatomized mechanical application, using covered curing techniques, and routing part or all of your emissions to an add-on control. You may use different compliance options for the different operations listed in Table 3 or 5 to this subpart. The necessary calculations must be completed within 30 days after the end of each month. You may switch between the compliance options in paragraphs (a) through (d) of this section. When you change to an option based on a 12-month rolling average, you must base the average on the previous 12 months of data calculated using the compliance option you are changing to, unless you were previously using an option that did not require you to maintain records of resin and gel coat use. In this case, you must immediately begin collecting resin and gel coat use data and demonstrate compliance 12 months after changing options.

(a) *Demonstrate that an individual resin or gel coat, as applied, meets the applicable emission limit in Table 3 or 5 to this subpart.* (1) Calculate your actual organic HAP emissions factor for each different process stream within each operation type. A process stream is defined as each individual combination of resin or gel coat, application technique, and control technique. Process streams within operations types are considered different from each other if any of the following four characteristics vary: the neat resin plus or neat gel coat plus organic HAP content, the gel coat type, the application technique, or the control technique. You must calculate organic HAP emissions factors for each different process stream by using the appropriate equations in Table 1 to this subpart for open molding and for centrifugal casting, or site-specific organic HAP emissions factors discussed in § 63.5796. The emission factor calculation should include any and all emission reduction techniques used including any add-on controls. If you are using vapor suppressants to reduce HAP emissions, you must determine the vapor suppressant effectiveness (VSE) by conducting testing according to the procedures specified in appendix A to subpart WWWW of 40 CFR part 63. If you are using an add-on control device to reduce HAP emissions, you must determine the add-on control factor by conducting capture and control efficiency testing using the procedures specified in § 63.5850. The organic HAP

emissions factor calculated from the equations in Table 1 to this subpart, or a site-specific emissions factor, is multiplied by the add-on control factor to calculate the organic HAP emissions factor after control. Use Equation 1 of this section to calculate the add-on control factor used in the organic HAP emissions factor equations.

$$\text{Add-on Control Factor} = 1 - \frac{\%\ \text{Control Efficiency}}{100} \qquad \text{(Eq. 1)}$$

Where:

Percent Control Efficiency=a value calculated from organic HAP emissions test measurements made according to the requirements of § 63.5850 to this subpart.

(2) If the calculated emission factor is less than or equal to the appropriate emission limit, you have demonstrated that this process stream complies with the emission limit in Table 3 to this subpart. It is not necessary that all your process streams, considered individually, demonstrate compliance to use this option for some process streams. However, for any individual resin or gel coat you use, if any of the process streams that include that resin or gel coat are to be used in any averaging calculations described in paragraphs (b) through (d) of this section, then all process streams using that individual resin or gel coat must be included in the averaging calculations.

(b) *Demonstrate that, on average, you meet the individual organic HAP emissions limits for each combination of operation type and resin application method or gel coat type.* Demonstrate that on average you meet the individual organic HAP emissions limits for each unique combination of operation type and resin application method or gel coat type shown in Table 3 to this subpart that applies to you.

(1)(i) Group the process streams described in paragraph (a) to this section by operation type and resin application method or gel coat type listed in Table 3 to this subpart and then calculate a weighted average emission factor based on the amounts of each individual resin or gel coat used for the last 12 months. To do this, sum the product of each individual organic HAP emissions factor calculated in paragraph (a)(1) of this section and the amount of neat resin plus and neat gel coat plus usage that corresponds to the individual factors and divide the numerator by the total amount of neat resin plus and neat gel coat plus used in that operation type as shown in Equation 2 of this section.

$$\text{Average organic HAP Emissions Factor} = \frac{\sum_{i=1}^{n}(\text{Actual Process Stream EF}_i * \text{Material}_i)}{\sum_{i=1}^{n}\text{Material}_i} \qquad \text{(Eq. 2)}$$

Where:

Actual Process Stream EF_i =actual organic HAP emissions factor for process stream i, lbs/ton;

$Material_i$ =neat resin plus or neat gel coat plus used during the last 12 calendar months for process stream i, tons;

n=number of process streams where you calculated an organic HAP emissions factor.

(ii) You may, but are not required to, include process streams where you have demonstrated compliance as described in paragraph (a) of this section, subject to the limitations described in paragraph (a)(2) of this section, and you are not required to and should not include process streams for which you will demonstrate compliance using the procedures in paragraph (d) of this section.

(2) Compare each organic HAP emissions factor calculated in paragraph (b)(1) of this section with its corresponding organic HAP emissions limit in Table 3 or 5 to this subpart. If all emissions factors are equal to or less than their corresponding emission limits, then you are in compliance.

(c) *Demonstrate compliance with a weighted average emission limit.* Demonstrate each month that you meet each weighted average of the organic HAP emissions limits in Table 3 or 5 to this subpart that apply to you. When using this option, you must demonstrate compliance with the weighted average organic HAP emissions limit for all your open molding operations, and then separately demonstrate compliance with the weighted average organic HAP emissions limit for all your centrifugal casting operations. Open molding operations and centrifugal casting operations may not be averaged with each other.

(1) Each month calculate the weighted average organic HAP emissions limit for all open molding operations and the weighted average organic HAP emissions limit for all centrifugal casting operations for your facility for the last 12-month period to determine the organic HAP emissions limit you must meet. To do this, multiply the individual organic HAP emissions limits in Table 3 or 5 to this subpart for each open molding (centrifugal casting) operation type by the amount of neat resin plus or neat gel coat plus used in the last 12 months for each open molding (centrifugal casting) operation type, sum these results, and then divide this sum by the total amount of neat resin plus and neat gel coat plus used in open molding (centrifugal casting) over the last 12 months as shown in Equation 3 of this section.

$$\text{Weighted Average Emission Limit} = \frac{\sum_{i=1}^{n}(EL_i * \text{Material}_i)}{\sum_{i=1}^{n}\text{Material}_i} \qquad \text{(Eq. 3)}$$

Where:

EL_i =organic HAP emissions limit for operation type i, lbs/ton from Tables 3 or 5 to this subpart;

Material_i =neat resin plus or neat gel coat plus used during the last 12-month period for operation type i, tons;

n=number of operations.

(2) Each month calculate your weighted average organic HAP emissions factor for open molding and centrifugal casting. To do this, multiply your actual open molding (centrifugal casting) operation organic HAP emissions factors calculated in paragraph (b)(1) of this section and the amount of neat resin plus and neat gel coat plus used in each open molding (centrifugal casting) operation type, sum the results, and divide this sum by the total amount of neat resin plus and neat gel coat plus used in open molding (centrifugal casting) operations as shown in Equation 4 of this section.

$$\text{Actual Weighted Average organic HAP Emissions Factor} = \frac{\sum_{i=1}^{n}(\text{Actual Operation EF}_i * \text{Material}_i)}{\sum_{i=1}^{n}\textit{Material}_i} \qquad \text{(Eq. 4)}$$

Where:

Actual Individual EF_i =Actual organic HAP emissions factor for operation type i, lbs/ton;

Material_i =neat resin plus or neat gel coat plus used during the last 12 calendar months for operation type i, tons;

n=number of operations.

(3) Compare the values calculated in paragraphs (c)(1) and (2) of this section. If each 12-month rolling average organic HAP emissions factor is less than or equal to the corresponding 12-month rolling average organic HAP emissions limit, then you are in compliance.

(d) *Meet the organic HAP emissions limit for one application method and use the same resin(s) for all application methods of that resin type.* This option is limited to resins of the same type. The resin types for which this option may be used are noncorrosion-resistant, corrosion-resistant and/or high strength, and tooling.

(1) For any combination of manual resin application, mechanical resin application, filament application, or centrifugal casting, you may elect to meet the organic HAP emissions limit for any one of these application methods and use the same resin in all of the resin application methods listed in this paragraph (d)(1). Table 7 to this subpart presents the possible combinations based on a facility selecting the application process that results in the highest allowable organic HAP content resin. If the resin organic HAP content is below the applicable value shown in Table 7 to this subpart, the resin is in compliance.

(2) You may also use a weighted average organic HAP content for each application method described in paragraph (d)(1) of this section. Calculate the weighted average organic HAP content monthly. Use Equation 2 in paragraph (b)(1) of this section except substitute organic HAP content for organic HAP emissions factor. You are in compliance if the weighted average organic HAP content based on the last 12 months of resin use is less than or equal to the applicable organic HAP contents in Table 7 to this subpart.

(3) You may simultaneously use the averaging provisions in paragraph (b) or (c) of this section to demonstrate compliance for any operations and/or resins you do not include in your compliance demonstrations in paragraphs (d)(1) and (2) of this section. However, any resins for which you claim compliance under the option in paragraphs (d)(1) and (2) of this section may not be included in any of the averaging calculations described in paragraph (b) or (c) of this section.

(4) You do not have to keep records of resin use for any of the individual resins where you demonstrate compliance under the option in paragraph (d)(1) of this section unless you elect to include that resin in the averaging calculations described in paragraph (d)(2) of this section.

[70 FR 50125, Aug. 25, 2005]

§ 63.5820 What are my options for meeting the standards for continuous lamination/casting operations?

You must use one or more of the options in paragraphs (a) through (d) of this section to meet the standards in § 63.5805. Use the calculation procedures in §§ 63.5865 through 63.5890.

(a) *Compliant line option.* Demonstrate that each continuous lamination line and each continuous casting line complies with the applicable standard.

(b) *Averaging option.* Demonstrate that all continuous lamination and continuous casting lines combined, comply with the applicable standard.

(c) *Add-on control device option.* If your operation must meet the 58.5 weight percent organic HAP emissions reduction limit in Table 3 to this subpart, you have the option of demonstrating that you achieve 95 percent reduction of all wet-out area organic HAP emissions.

(d) *Combination option.* Use any combination of options in paragraphs (a) and (b) of this section or, for affected sources at existing facilities, any combination of options in paragraphs (a), (b), and (c) of this section (in which one or more lines meet the standards on their own, two or more lines averaged together meet the standards, and one or more lines have their wet-out areas controlled to a level of 95 percent).

§ 63.5830 What are my options for meeting the standards for pultrusion operations subject to the 60 weight percent organic HAP emissions reductions requirement?

You must use one or more of the options in paragraphs (a) through (e) of this section to meet the 60 weight percent organic HAP emissions limit in Table 3 to this subpart, as required in § 63.5805.

(a) Achieve an overall reduction in organic HAP emissions of 60 weight percent by capturing the organic HAP emissions and venting them to a control device or any combination of control devices. Conduct capture and destruction efficiency testing as specified in 63.5850 to this subpart to determine the percent organic HAP emissions reduction.

(b) Design, install, and operate wet area enclosures and resin drip collection systems on pultrusion machines that meet the criteria in paragraphs (b)(1) through (10) of this section.

(1) The enclosure must cover and enclose the open resin bath and the forming area in which reinforcements are pre-wet or wet-out and moving toward the die(s). The surfaces of the enclosure must be closed except for openings to allow material to enter and exit the enclosure.

(2) For open bath pultrusion machines with a radio frequency pre-heat unit, the enclosure must extend from the beginning of the resin bath to within 12.5 inches or less of the entrance of the radio frequency pre-heat unit. If the stock that is within 12.5 inches or less of the entrance to the radio frequency pre-heat unit has any drip, it must be enclosed. The stock exiting the radio frequency pre-heat unit is not required to be in an enclosure if the stock has no drip between the exit of the radio frequency pre-heat unit to within 0.5 inches of the entrance of the die.

(3) For open bath pultrusion machines without a radio frequency pre-heat unit, the enclosure must extend from the beginning of the resin bath to within 0.5 inches or less of the die entrance.

(4) For pultrusion lines with pre-wet area(s) prior to direct die injection, no more than 12.5 inches of open wet stock is permitted between the entrance of the first pre-wet area and the entrance to the die. If the pre-wet stock has any drip, it must be enclosed.

(5) The total open area of the enclosure must not exceed two times the cross sectional area of the puller window(s) and must comply with the requirements in paragraphs (b)(5)(i) through (iii) of this section.

(i) All areas that are open need to be included in the total open area calculation with the exception of access panels, doors, and/or hatches that are part of the enclosure.

(ii) The area that is displaced by entering reinforcement or exiting product is considered open.

(iii) Areas that are covered by brush covers are considered closed.

(6) Open areas for level control devices, monitoring devices, agitation shafts, and fill hoses must have no more than 1.0 inch clearance.

(7) The access panels, doors, and/or hatches that are part of the enclosure must close tightly. Damaged access panels, doors, and/or hatches that do not close tightly must be replaced.

(8) The enclosure may not be removed from the pultrusion line, and access panels, doors, and/or hatches that are part of the enclosure must remain closed whenever resin is in the bath, except for the time period discussed in paragraph (b)(9) of this section.

(9) The maximum length of time the enclosure may be removed from the pultrusion line or the access panels, doors, and/or hatches and may be open, is 30 minutes per 8 hour shift, 45 minutes per 12 hour shift, or 90 minutes per day if the machine is operated for 24 hours in a day. The time restrictions do not apply if the open doors or panels do not cause the limit of two times the puller window area to be exceeded. Facilities may average the times that access panels, doors, and/or hatches are open across all operating lines. In that case the average must not exceed the times

shown in this paragraph (b)(9). All lines included in the average must have operated the entire time period being averaged.

(10) No fans, blowers, and/or air lines may be allowed within the enclosure. The enclosure must not be ventilated.

(c) Use direct die injection pultrusion machines with resin drip collection systems that meet all the criteria specified in paragraphs (c)(1) through (3) of this section.

(1) All the resin that is applied to the reinforcement is delivered directly to the die.

(2) No exposed resin is present, except at the face of the die.

(3) Resin drip is captured in a closed system and recycled back to the process.

(d) Use a preform injection system that meets the definition in § 63.5935

(e) Use any combination of options in paragraphs (a) through (d) of this section in which different pultrusion lines comply with different options described in paragraphs (a) through (d) of this section, and

(1) Each individual pultrusion machine meets the 60 percent reduction requirement, or

(2) The weighted average reduction based on resin throughput of all machines combined is 60 percent. For purposes of the average percent reduction calculation, wet area enclosures reduce organic HAP emissions by 60 percent, and direct die injection and preform injection reduce organic HAP emissions by 90 percent.

[68 FR 19402, Apr. 21, 2003, as amended at 70 FR 50127, Aug. 25, 2005]

General Compliance Requirements

§ 63.5835 What are my general requirements for complying with this subpart?

(a) You must be in compliance at all times with the work practice standards in Table 4 to this subpart, as well as the organic HAP emissions limits in Tables 3, or 5, or the organic HAP content limits in Table 7 to this subpart, as applicable, that you are meeting without the use of add-on controls.

(b) You must be in compliance with all organic HAP emissions limits in this subpart that you meet using add-on controls, except during periods of startup, shutdown, and malfunction.

(c) You must always operate and maintain your affected source, including air pollution control and monitoring equipment, according to the provisions in § 63.6(e)(1)(i).

(d) You must develop a written startup, shutdown, and malfunction plan according to the provisions in § 63.6(e)(3) for any organic HAP emissions limits you meet using an add-on control.

[68 FR 19402, Apr. 21, 2003, as amended at 71 FR 20466, Apr. 20, 2006]

Testing and Initial Compliance Requirements

§ 63.5840 By what date must I conduct a performance test or other initial compliance demonstration?

You must conduct performance tests, performance evaluations, design evaluations, capture efficiency testing, and other initial compliance demonstrations by the compliance date specified in Table 2 to this subpart, with three exceptions. Open molding and centrifugal casting operations that elect to meet an organic HAP emissions limit on a 12-month rolling average must initiate collection of the required data on the compliance date, and demonstrate

compliance 1 year after the compliance date. New sources that use add-on controls to initially meet compliance must demonstrate compliance within 180 days after their compliance date.

§ 63.5845 When must I conduct subsequent performance tests?

You must conduct a performance test every 5 years following the initial performance test for any standard you meet with an add-on control device.

§ 63.5850 How do I conduct performance tests, performance evaluations, and design evaluations?

(a) If you are using any add-on controls to meet an organic HAP emissions limit in this subpart, you must conduct each performance test, performance evaluation, and design evaluation in 40 CFR part 63, subpart SS, that applies to you. The basic requirements for performance tests, performance evaluations, and design evaluations are presented in Table 6 to this subpart.

(b) Each performance test must be conducted according to the requirements in § 63.7(e)(1) and under the specific conditions that 40 CFR part 63, subpart SS, specifies.

(c) Each performance evaluation must be conducted according to the requirements in § 63.8(e) as applicable and under the specific conditions that 40 CFR part 63, subpart SS, specifies.

(d) You may not conduct performance tests or performance evaluations during periods of startup, shutdown, or malfunction, as specified in § 63.7(e)(1).

(e) You must conduct the control device performance test using the emission measurement methods specified in paragraphs (e)(1) through (5) of this section.

(1) Use either Method 1 or 1A of appendix A to 40 CFR part 60, as appropriate, to select the sampling sites.

(2) Use Method 2, 2A, 2C, 2D, 2F or 2G of appendix A to 40 CFR part 60, as appropriate, to measure gas volumetric flow rate.

(3) Use Method 18 of appendix A to 40 CFR part 60 to measure organic HAP emissions or use Method 25A of appendix A to 40 CFR part 60 to measure total gaseous organic emissions as a surrogate for total organic HAP emissions. If you use Method 25A, you must assume that all gaseous organic emissions measured as carbon are organic HAP emissions. If you use Method 18 and the number of organic HAP in the exhaust stream exceeds five, you must take into account the use of multiple chromatographic columns and analytical techniques to get an accurate measure of at least 90 percent of the total organic HAP mass emissions. Do not use Method 18 to measure organic HAP emissions from a combustion device; use instead Method 25A and assume that all gaseous organic mass emissions measured as carbon are organic HAP emissions.

(4) You may use American Society for Testing and Materials (ASTM) D6420-99 (available for purchase from at least one of the following addresses: 100 Barr Harbor Drive, West Conshohocken, PA 19428-2959; or University Microfilms International, 300 North Zeeb Road, Ann Arbor, MI 48106.) in lieu of Method 18 of 40 CFR part 60, appendix A, under the conditions specified in paragraphs (c)(4)(i) through (iii) of this section.

(i) If the target compound(s) is listed in Section 1.1 of ASTM D6420-99 and the target concentration is between 150 parts per billion by volume and 100 parts per million by volume.

(ii) If the target compound(s) is not listed in Section 1.1 of ASTM D6420-99, but is potentially detected by mass spectrometry, an additional system continuing calibration check after each run, as detailed in Section 10.5.3 of ASTM D6420-99, must be followed, met, documented, and submitted with the performance test report even if you do not use a moisture condenser or the compound is not considered soluble.

(iii) If a minimum of one sample/analysis cycle is completed at least every 15 minutes.

(5) Use the procedures in EPA Method 3B of appendix A to 40 CFR part 60 to determine an oxygen correction factor if required by § 63.997(e)(2)(iii)(C). You may use American Society of Mechanical Engineers (ASME) PTC 19-10-1981-Part 10 (available for purchase from ASME, P.O. Box 2900, 22 Law Drive, Fairfield, New Jersey, 07007-2900, or online at *www.asme.org/catalog*) as an alternative to EPA Method 3B of appendix A to 40 CFR part 60.

(f) The control device performance test must consist of three runs and each run must last at least 1 hour. The production conditions during the test runs must represent normal production conditions with respect to the types of parts being made and material application methods. The production conditions during the test must also represent maximum potential emissions with respect to the organic HAP content of the materials being applied and the material application rates.

(g) If you are using a concentrator/oxidizer control device, you must test the combined flow upstream of the concentrator, and the combined outlet flow from both the oxidizer and the concentrator to determine the overall control device efficiency. If the outlet flow from the concentrator and oxidizer are exhausted in separate stacks, you must test both stacks simultaneously with the inlet to the concentrator to determine the overall control device efficiency.

(h) During the test, you must also monitor and record separately the amounts of production resin, tooling resin, pigmented gel coat, clear gel coat, and tooling gel coat applied inside the enclosure that is vented to the control device.

§ 63.5855 What are my monitor installation and operation requirements?

You must monitor and operate all add-on control devices according to the procedures in 40 CFR part 63, subpart SS.

§ 63.5860 How do I demonstrate initial compliance with the standards?

(a) You demonstrate initial compliance with each organic HAP emissions standard in paragraphs (a) through (h) of § 63.5805 that applies to you by using the procedures shown in Tables 8 and 9 to this subpart.

(b) If using an add-on control device to demonstrate compliance, you must also establish each control device operating limit in 40 CFR part 63, subpart SS, that applies to you.

Emission Factor, Percent Reduction, and Capture Efficiency Calculation Procedures for Continuous Lamination/Casting Operations

§ 63.5865 What data must I generate to demonstrate compliance with the standards for continuous lamination/casting operations?

(a) For continuous lamination/casting affected sources complying with a percent reduction requirement, you must generate the data identified in Tables 10 and 11 to this subpart for each data requirement that applies to your facility.

(b) For continuous lamination/casting affected sources complying with a lbs/ton limit, you must generate the data identified in Tables 11 and 12 to this subpart for each data requirement that applies to your facility.

§ 63.5870 How do I calculate annual uncontrolled and controlled organic HAP emissions from my wet-out area(s) and from my oven(s) for continuous lamination/casting operations?

To calculate your annual uncontrolled and controlled organic HAP emissions from your wet-out areas and from your ovens, you must develop uncontrolled and controlled wet-out area and uncontrolled and controlled oven organic HAP emissions estimation equations or factors to apply to each formula applied on each line, determine how much of each formula for each end product is applied each year on each line, and assign uncontrolled and controlled wet-out area and uncontrolled and controlled oven organic HAP emissions estimation equations or factors to each formula. You must determine the overall capture efficiency using the procedures in § 63.5850 to this subpart.

(a) To develop uncontrolled and controlled organic HAP emissions estimation equations and factors, you must, at a minimum, do the following, as specified in paragraphs (a)(1) through (6) of this section:

(1) Identify each end product and the thickness of each end product produced on the line. Separate end products into the following end product groupings, as applicable: corrosion-resistant gel coated end products, noncorrosion-resistant gel coated end products, corrosion-resistant nongel coated end products, and noncorrosion-resistant nongel coated end products. This step creates end product/thickness combinations.

(2) Identify each formula used on the line to produce each end product/thickness combination. Identify the amount of each such formula applied per year. Rank each formula used to produce each end product/thickness combination according to usage within each end product/thickness combination.

(3) For each end product/thickness combination being produced, select the formula with the highest usage rate for testing.

(4) If not already selected, also select the worst-case formula (likely to be associated with the formula with the highest organic HAP content, type of HAP, application of gel coat, thin product, low line speed, higher resin table temperature) amongst all formulae. (You may use the results of the worst-case formula test for all formulae if desired to limit the amount of testing required.)

(5) For each formula selected for testing, conduct at least one test (consisting of three runs). During the test, track information on organic HAP content and type of HAP, end product thickness, line speed, and resin temperature on the wet-out area table.

(6) Using the test results, develop uncontrolled and controlled organic HAP emissions estimation equations (or factors) or series of equations (or factors) that best fit the results for estimating uncontrolled and controlled organic HAP emissions, taking into account the organic HAP content and type of HAP, end product thickness, line speed, and resin temperature on the wet-out area table.

(b) In lieu of using the method specified in paragraph (a) of this section for developing uncontrolled and controlled organic HAP emissions estimation equations and factors, you may either method specified in paragraphs (b)(1) and (2) of this section, as applicable.

(1) For either uncontrolled or controlled organic HAP emissions estimates, you may use previously established, facility-specific organic HAP emissions equations or factors, provided they allow estimation of both wet-out area and oven organic HAP emissions, where necessary, and have been approved by your permitting authority. If a previously established equation or factor is specific to the wet-out area only, or to the oven only, then you must develop the corresponding uncontrolled or controlled equation or factor for the other organic HAP emissions source.

(2) For uncontrolled (controlled) organic HAP emissions estimates, you may use controlled (uncontrolled) organic HAP emissions estimates and control device destruction efficiency to calculate your uncontrolled (controlled) organic HAP emissions provided the control device destruction efficiency was calculated at the same time you collected the data to develop your facility's controlled (uncontrolled) organic HAP emissions estimation equations and factors.

(c) Assign to each formula an uncontrolled organic HAP emissions estimation equation or factor based on the end product/thickness combination for which that formula is used.

(d)(1) To calculate your annual uncontrolled organic HAP emissions from wet-out areas that do not have any capture and control and from wet-out areas that are captured by an enclosure but are vented to the atmosphere and not to a control device, multiply each formula's annual usage by its appropriate organic HAP emissions estimation equation or factor and sum the individual results.

(2) To calculate your annual uncontrolled organic HAP emissions that escape from the enclosure on the wet-out area, multiply each formula's annual usage by its appropriate uncontrolled organic HAP emissions estimation equation or factor, sum the individual results, and multiply the summation by 1 minus the percent capture (expressed as a fraction).

(3) To calculate your annual uncontrolled oven organic HAP emissions, multiply each formula's annual usage by its appropriate uncontrolled organic HAP emissions estimation equation or factor and sum the individual results.

(4) To calculate your annual controlled organic HAP emissions, multiply each formula's annual usage by its appropriate organic HAP emissions estimation equation or factor and sum the individual results to obtain total annual controlled organic HAP emissions.

(e) Where a facility is calculating both uncontrolled and controlled organic HAP emissions estimation equations and factors, you must test the same formulae. In addition, you must develop both sets of equations and factors from the same tests.

§ 63.5875 How do I determine the capture efficiency of the enclosure on my wet-out area and the capture efficiency of my oven(s) for continuous lamination/casting operations?

(a) The capture efficiency of a wet-out area enclosure is assumed to be 100 percent if it meets the design and operation requirements for a permanent total enclosure (PTE) specified in EPA Method 204 of appendix M to 40 CFR part 51. If a PTE does not exist, then a temporary total enclosure must be constructed and verified using EPA Method 204, and capture efficiency testing must be determined using EPA Methods 204B through E of appendix M to 40 CFR part 51.

(b) The capture efficiency of an oven is to be considered 100 percent, provided the oven is operated under negative pressure.

§ 63.5880 How do I determine how much neat resin plus is applied to the line and how much neat gel coat plus is applied to the line for continuous lamination/casting operations?

Use the following procedures to determine how much neat resin plus and neat gel coat plus is applied to the line each year.

(a) Track formula usage by end product/thickness combinations.

(b) Use in-house records to show usage. This may be either from automated systems or manual records.

(c) Record daily the usage of each formula/end product combination on each line. This is to be recorded at the end of each run (*i.e.,* when a changeover in formula or product is made) and at the end of each shift.

(d) Sum the amounts from the daily records to calculate annual usage of each formula/end product combination by line.

§ 63.5885 How do I calculate percent reduction to demonstrate compliance for continuous lamination/casting operations?

You may calculate percent reduction using any of the methods in paragraphs (a) through (d) of this section.

(a) *Compliant line option.* If all of your wet-out areas have PTE that meet the requirements of EPA Method 204 of appendix M of 40 CFR part 51, and all of your wet-out area organic HAP emissions and oven organic HAP emissions are vented to an add-on control device, use Equation 1 of this section to demonstrate compliance. In all other situations, use Equation 2 of this section to demonstrate compliance.

$$PR = \frac{(\text{Inlet}) - (\text{Outlet})}{(\text{Inlet})} \times 100 \qquad \text{(Eq. 1)}$$

Where:

PR=percent reduction;

Inlet+HAP emissions entering the control device, lbs per year;

Outlet=HAP emissions existing the control device to the atmosphere, lbs per year.

$$PR = \frac{(WAE_{ci} + O_{ci}) - (WAE_{co} + O_{co})}{(WAE_{ci} + WAE_{u} + O_{ci} + O_{u})} \times 100 \qquad \text{(Eq. 2)}$$

Where:

PR=percent reduction;

$WAEi_{ci}$ =wet-out area organic HAP emissions, lbs per year, vented to a control device;

$WAEi_{u}$ =wet-out area organic HAP emissions, lbs per year, not vented to a control device;

Oj_{u} =oven organic HAP emissions, lbs per year, not vented to a control device;

Oj_{ci} =oven organic HAP emissions, lbs per year, vented to a control device;

$WAEi_{co}$ =wet-out area organic HAP emissions, lbs per year, from the control device outlet;

Oj_{co} =oven organic HAP emissions, lbs per year, from the control device outlet.

(b) *Averaging option.* Use Equation 3 of this section to calculate percent reduction.

$$PR = \frac{\left(\sum_{i=1}^{m} WAEi_{ci} + \sum_{j=1}^{n} Oj_{ci}\right) - \left(\sum_{i=1}^{m} WAEi_{co} + \sum_{j=1}^{n} Oj_{co}\right)}{\left(\sum_{i=1}^{m} WAEi_{ci} + \sum_{j=1}^{n} Oj_{ci} + \sum_{i=1}^{m} WAEi_{u} + \sum_{j=1}^{n} Oj_{u}\right)} \times 100 \qquad \text{(Eq. 3)}$$

Where:

PR=percent reduction;

$WAEi_{ci}$ =wet-out area organic HAP emissions from wet-out area i, lbs per year, sent to a control device;

$WAEi_{u}$ =wet-out area organic HAP emissions from wet-out area i, lbs per year, not sent to a control device;

$WAEi_{co}$ =wet-out area organic HAP emissions from wet-out area i, lbs per year, at the outlet of a control device;

Oj_{u} =organic HAP emissions from oven j, lbs per year, not sent to a control device;

Oj_{ci} =organic HAP emissions from oven j, lbs per year, sent to a control device;

Oj_{co} =organic HAP emissions from oven j, lbs per year, at the outlet of the control device;

m=number of wet-out areas;

n=number of ovens.

(c) *Add-on control device option.* Use Equation 1 of this section to calculate percent reduction.

(d) *Combination option.* Use Equations 1 through 3 of this section, as applicable, to calculate percent reduction.

[70 FR 50127, Aug. 25, 2005]

§ 63.5890 How do I calculate an organic HAP emissions factor to demonstrate compliance for continuous lamination/casting operations?

(a) *Compliant line option.* Use Equation 1 of this section to calculate an organic HAP emissions factor in lbs/ton.

$$E = \frac{WAE_u + WAE_c + O_u + O_c}{(R+G)} \quad (Eq.\ 1)$$

Where:

E=HAP emissions factor in lbs/ton of resin and gel coat

WAE_u =uncontrolled wet-out area organic HAP emissions, lbs per year

WAE_c =controlled wet-out area organic HAP emissions, lbs per year

O_u =uncontrolled oven organic HAP emissions, lbs per year

O_c =controlled oven organic HAP emissions, lbs per year

R=total usage of neat resin plus, tpy

G=total usage of neat gel coat plus, tpy

(b) *Averaging option.* Use Equation 2 of this section to demonstrate compliance.

$$E = \frac{\sum_{i=1}^{m} WAE_{ui} + \sum_{i=1}^{o} WAE_{ci} + \sum_{j=1}^{n} O_{uj} + \sum_{j=1}^{p} O_{cj}}{(R+G)} \quad (Eq.\ 2)$$

Where:

E=HAP emissions factor in lbs/ton of resin and gel coat

WAE_{ui} =uncontrolled organic HAP emissions from wet-out area i, lbs per year

WAE_{ci} =controlled organic HAP emissions from wet-out area i, lbs per year

O_{uj} =uncontrolled organic HAP emissions from oven j, lbs per year

O_{cj} =controlled organic HAP emissions from oven j, lbs per year

i=number of wet-out areas

j=number of ovens

m=number of wet-out areas uncontrolled

n=number of ovens uncontrolled

o=number of wet-out areas controlled

p=number of ovens controlled

R=total usage of neat resin plus, tpy

G=total usage of neat gel coat plus, tpy

(c) *Combination option.* Use Equations 1 and 2 of this section, as applicable, to demonstrate compliance.

Continuous Compliance Requirements

§ 63.5895 How do I monitor and collect data to demonstrate continuous compliance?

(a) During production, you must collect and keep a record of data as indicated in 40 CFR part 63, subpart SS, if you are using an add-on control device.

(b) You must monitor and collect data as specified in paragraphs (b)(1) through (4) of this section.

(1) Except for monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), you must conduct all monitoring in continuous operation (or collect data at all required intervals) at all times that the affected source is operating.

(2) You may not use data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities for purposes to this subpart, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. You must use all the data collected during all other periods in assessing the operation of the control device and associated control system.

(3) At all times, you must maintain necessary parts for routine repairs of the monitoring equipment.

(4) A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring equipment to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

(c) You must collect and keep records of resin and gel coat use, organic HAP content, and operation where the resin is used if you are meeting any organic HAP emissions limits based on an organic HAP emissions limit in Tables 3 or 5 to this subpart. You must collect and keep records of resin and gel coat use, organic HAP content, and operation where the resin is used if you are meeting any organic HAP content limits in Table 7 to this subpart if you are averaging organic HAP contents. Resin use records may be based on purchase records if you can reasonably estimate how the resin is applied. The organic HAP content records may be based on MSDS or on resin specifications supplied by the resin supplier.

(d) Resin and gel coat use records are not required for the individual resins and gel coats that are demonstrated, as applied, to meet their applicable emission as defined in § 63.5810(a). However, you must retain the records of resin and gel coat organic HAP content, and you must include the list of these resins and gel coats and identify their application methods in your semiannual compliance reports. If after you have initially demonstrated that a specific combination of an individual resin or gel coat, application method, and controls meets its applicable emission limit,

and the resin or gel coat changes or the organic HAP content increases, or you change the application method or controls, then you again must demonstrate that the individual resin or gel coat meets its emission limit as specified in paragraph (a) of § 63.5810. If any of the previously mentioned changes results in a situation where an individual resin or gel coat now exceeds its applicable emission limit in Table 3 or 5 of this subpart, you must begin collecting resin and gel coat use records and calculate compliance using one of the averaging options on a 12-month rolling average.

(e) For each of your pultrusion machines, you must record all times that wet area enclosures doors or covers are open and there is resin present in the resin bath.

[68 FR 19402, Apr. 21, 2003, as amended at 70 FR 50128, Aug. 25, 2005]

§ 63.5900 How do I demonstrate continuous compliance with the standards?

(a) You must demonstrate continuous compliance with each standard in § 63.5805 that applies to you according to the methods specified in paragraphs (a)(1) through (3) of this section.

(1) Compliance with organic HAP emissions limits for sources using add-on control devices is demonstrated following the procedures in 40 CFR part 63, subpart SS. Sources using add-on controls may also use continuous emissions monitors to demonstrate continuous compliance as an alternative to control parameter monitoring.

(2) Compliance with organic HAP emissions limits is demonstrated by maintaining an organic HAP emissions factor value less than or equal to the appropriate organic HAP emissions limit listed in Table 3 or 5 to this subpart, on a 12-month rolling average, and/or by including in each compliance report a statement that individual resins and gel coats, as applied, meet the appropriate organic HAP emissions limits, as discussed in § 63.5895(d).

(3) Compliance with organic HAP content limits in Table 7 to this subpart is demonstrated by maintaining an average organic HAP content value less than or equal to the appropriate organic HAP contents listed in Table 7 to this subpart, on a 12-month rolling average, and/or by including in each compliance report a statement that resins and gel coats individually meet the appropriate organic HAP content limits in Table 7 to this subpart, as discussed in § 63.5895(d).

(4) Compliance with the work practice standards in Table 4 to this subpart is demonstrated by performing the work practice required for your operation.

(b) You must report each deviation from each standard in § 63.5805 that applies to you. The deviations must be reported according to the requirements in § 63.5910.

(c) Except as provided in paragraph (d) of this section, during periods of startup, shutdown or malfunction, you must meet the organic HAP emissions limits and work practice standards that apply to you.

(d) When you use an add-on control device to meet standards in § 63.5805, you are not required to meet those standards during periods of startup, shutdown, or malfunction, but you must operate your affected source to minimize emissions in accordance with § 63.6(e)(1).

(e) Consistent with §§ 63.6(e) and 63.7(e)(1), deviations that occur during a period of malfunction for those affected sources and standards specified in paragraph (d) of this section are not violations if you demonstrate to the Administrator's satisfaction that you were operating in accordance with § 63.6(e)(1). The Administrator will determine whether deviations that occur during a period of startup, shutdown, and malfunction are violations, according to the provisions in § 63.6(e).

[68 FR 19402, Apr. 21, 2003, as amended at 70 FR 50128, Aug. 25, 2005; 71 FR 20466, Apr. 20, 2006]

Notifications, Reports, and Records

§ 63.5905 What notifications must I submit and when?

(a) You must submit all of the notifications in Table 13 to this subpart that apply to you by the dates specified in Table 13 to this subpart. The notifications are described more fully in 40 CFR part 63, subpart A, referenced in Table 13 to this subpart.

(b) If you change any information submitted in any notification, you must submit the changes in writing to the Administrator within 15 calendar days after the change.

§ 63.5910 What reports must I submit and when?

(a) You must submit each report in Table 14 to this subpart that applies to you.

(b) Unless the Administrator has approved a different schedule for submission of reports under § 63.10(a), you must submit each report by the date specified in Table 14 to this subpart and according to paragraphs (b)(1) through (5) of this section.

(1) The first compliance report must cover the period beginning on the compliance date that is specified for your affected source in § 63.5800 and ending on June 30 or December 31, whichever date is the first date following the end of the first calendar half after the compliance date that is specified for your source in § 63.5800.

(2) The first compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date follows the end of the first calendar half after the compliance date that is specified for your affected source in § 63.5800.

(3) Each subsequent compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31.

(4) Each subsequent compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period.

(5) For each affected source that is subject to permitting requirements pursuant to 40 CFR part 70 or 71, and if the permitting authority has established dates for submitting semiannual reports pursuant to § 70.6 (a)(3)(iii)(A) or § 71.6(a)(3)(iii)(A), you may submit the first and subsequent compliance reports according to the dates the permitting authority has established instead of according to the dates in paragraphs (b)(1) through (4) of this section.

(c) The compliance report must contain the information in paragraphs (c)(1) through (6) of this section:

(1) Company name and address.

(2) Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.

(3) Date of the report and beginning and ending dates of the reporting period.

(4) If you had a startup, shutdown, or malfunction during the reporting period and you took actions consistent with your startup, shutdown, and malfunction plan, the compliance report must include the information in § 63.10(d)(5)(i).

(5) If there are no deviations from any organic HAP emissions limitations (emissions limit and operating limit) that apply to you, and there are no deviations from the requirements for work practice standards in Table 4 to this subpart, a statement that there were no deviations from the organic HAP emissions limitations or work practice standards during the reporting period.

(6) If there were no periods during which the continuous monitoring system (CMS), including a continuous emissions monitoring system (CEMS) and an operating parameter monitoring system were out of control, as specified in § 63.8(c)(7), a statement that there were no periods during which the CMS was out of control during the reporting period.

(d) For each deviation from an organic HAP emissions limitation (*i.e.,* emissions limit and operating limit) and for each deviation from the requirements for work practice standards that occurs at an affected source where you are not using a CMS to comply with the organic HAP emissions limitations or work practice standards in this subpart, the compliance report must contain the information in paragraphs (c)(1) through (4) of this section and in paragraphs (d)(1) and (2) of this section. This includes periods of startup, shutdown, and malfunction.

(1) The total operating time of each affected source during the reporting period.

(2) Information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken.

(e) For each deviation from an organic HAP emissions limitation (*i.e.,* emissions limit and operating limit) occurring at an affected source where you are using a CMS to comply with the organic HAP emissions limitation in this subpart, you must include the information in paragraphs (c)(1) through (4) of this section and in paragraphs (e)(1) through (12) of this section. This includes periods of startup, shutdown, and malfunction.

(1) The date and time that each malfunction started and stopped.

(2) The date and time that each CMS was inoperative, except for zero (low-level) and high-level checks.

(3) The date, time, and duration that each CMS was out of control, including the information in § 63.8(c)(8).

(4) The date and time that each deviation started and stopped, and whether each deviation occurred during a period of startup, shutdown, or malfunction, or during another period.

(5) A summary of the total duration of the deviation during the reporting period and the total duration as a percent of the total source operating time during that reporting period.

(6) A breakdown of the total duration of the deviations during the reporting period into those that are due to startup, shutdown, control equipment problems, process problems, other known causes, and other unknown causes.

(7) A summary of the total duration of CMS downtime during the reporting period and the total duration of CMS downtime as a percent of the total source operating time during that reporting period.

(8) An identification of each organic HAP that was monitored at the affected source.

(9) A brief description of the process units.

(10) A brief description of the CMS.

(11) The date of the latest CMS certification or audit.

(12) A description of any changes in CMS, processes, or controls since the last reporting period.

(f) You must report if you have exceeded the 100 tpy organic HAP emissions threshold if that exceedance would make your facility subject to § 63.5805(a)(1) or (d). Include with this report any request for an exemption under § 63.5805(e). If you receive an exemption under § 63.5805(e) and subsequently exceed the 100 tpy organic HAP emissions threshold, you must report this exceedance as required in § 63.5805(f).

(g) Each affected source that has obtained a title V operating permit pursuant to 40 CFR part 70 or 71 must report all deviations as defined in this subpart in the semiannual monitoring report required by § 70.6(a)(3)(iii)(A) or

§ 71.6(a)(3)(iii)(A). If an affected source submits a compliance report pursuant to Table 14 to this subpart along with, or as part of, the semiannual monitoring report required by § 70.6(a)(3)(iii)(A) or § 71.6(a)(3)(iii)(A), and the compliance report includes all required information concerning deviations from any organic HAP emissions limitation (including any operating limit) or work practice requirement in this subpart, submission of the compliance report shall be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submission of a compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the permitting authority.

(h) Submit compliance reports and startup, shutdown, and malfunction reports based on the requirements in table 14 to this subpart, and not based on the requirements in § 63.999.

(i) Where multiple compliance options are available, you must state in your next compliance report if you have changed compliance options since your last compliance report.

[68 FR 19402, Apr. 21, 2003, as amended at 70 FR 50128, Aug. 25, 2005]

§ 63.5915 What records must I keep?

(a) You must keep the records listed in paragraphs (a)(1) through (3) of this section.

(1) A copy of each notification and report that you submitted to comply with this subpart, including all documentation supporting any Initial Notification or Notification of Compliance Status that you submitted, according to the requirements in § 63.10(b)(2)(xiv).

(2) The records in § 63.6(e)(3)(iii) through (v) related to startup, shutdown, and malfunction.

(3) Records of performance tests, design, and performance evaluations as required in § 63.10(b)(2).

(b) If you use an add-on control device, you must keep all records required in 40 CFR part 63, subpart SS, to show continuous compliance with this subpart.

(c) You must keep all data, assumptions, and calculations used to determine organic HAP emissions factors or average organic HAP contents for operations listed in tables 3, 5, and 7 to this subpart.

(d) You must keep a certified statement that you are in compliance with the work practice requirements in Table 4 to this subpart, as applicable.

(e) For a new or existing continuous lamination/ casting operation, you must keep the records listed in paragraphs (e)(1) through (4) of this section, when complying with the percent reduction and/or lbs/ton requirements specified in paragraphs (a) and (c) through (d) of § 63.5805.

(1) You must keep all data, assumptions, and calculations used to determine percent reduction and/or lbs/ton as applicable;

(2) You must keep a brief description of the rationale for the assignment of an equation or factor to each formula;

(3) When using facility-specific organic HAP emissions estimation equations or factors, you must keep all data, assumptions, and calculations used to derive the organic HAP emissions estimation equations and factors and identification and rationale for the worst-case formula; and

(4) For all organic HAP emissions estimation equations and organic HAP emissions factors, you must keep documentation that the appropriate permitting authority has approved them.

[68 FR 19402, Apr. 21, 2003, as amended at 70 FR 50129, Aug. 25, 2005]

§ 63.5920 In what form and how long must I keep my records?

(a) You must maintain all applicable records in such a manner that they can be readily accessed and are suitable for inspection according to § 63.10(b)(1).

(b) As specified in § 63.10(b)(1), you must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.

(c) You must keep each record onsite for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to § 63.10(b)(1). You can keep the records offsite for the remaining 3 years.

(d) You may keep records in hard copy or computer readable form including, but not limited to, paper, microfilm, computer floppy disk, magnetic tape, or microfiche.

Other Requirements and Information

§ 63.5925 What parts of the General Provisions apply to me?

Table 15 to this subpart shows which parts of the General Provisions in §§ 63.1 through 63.15 apply to you.

§ 63.5930 Who implements and enforces this subpart?

(a) This subpart can be administered by us, the EPA, or a delegated authority such as your State, local, or tribal agency. If the EPA Administrator has delegated authority to your State, local, or tribal agency, then that agency has the authority to administer and enforce this subpart. You should contact your EPA Regional Office to find out if this subpart is delegated to your State, local, or tribal agency.

(b) In delegating implementation and enforcement authority of this subpart to a State, local, or tribal agency under 40 CFR part 63, subpart E, the authorities contained in paragraph (c) of this section are not delegated.

(c) The authorities that will not be delegated to State, local, or tribal agencies are listed in paragraphs (c)(1) through (4) of this section:

(1) Approval of alternatives to the organic HAP emissions standards in § 63.5805 under § 63.6(g).

(2) Approval of major changes to test methods under § 63.7(e)(2)(ii) and (f) and as defined in § 63.90.

(3) Approval of major changes to monitoring under § 63.8(f) and as defined in § 63.90.

(4) Approval of major changes to recordkeeping and reporting under § 63.10(f) and as defined in § 63.90.

§ 63.5935 What definitions apply to this subpart?

Terms used in this subpart are defined in the CAA, in 40 CFR 63.2, and in this section as follows:

Atomized mechanical application means application of resin or gel coat with spray equipment that separates the liquid into a fine mist. This fine mist may be created by forcing the liquid under high pressure through an elliptical orifice, bombarding a liquid stream with directed air jets, or a combination of these techniques.

Bulk molding compound (BMC) means a putty-like molding compound containing resin(s) in a form that is ready to mold. In addition to resins, BMC may contain catalysts, fillers, and reinforcements. Bulk molding compound can be used in compression molding and injection molding operations to manufacture reinforced plastic composites products.

BMC manufacturing means a process that involves the preparation of BMC.

Centrifugal casting means a process for fabricating cylindrical composites, such as pipes, in which composite materials are positioned inside a rotating hollow mandrel and held in place by centrifugal forces until the part is sufficiently cured to maintain its physical shape.

Charge means the amount of SMC or BMC that is placed into a compression or injection mold necessary to complete one mold cycle.

Cleaning means removal of composite materials, such as cured and uncured resin from equipment, finished surfaces, floors, hands of employees, or any other surfaces.

Clear production gel coat means an unpigmented, quick-setting resin used to improve the surface appearance and/or performance of composites. It can be used to form the surface layer of any composites other than those used for molds in tooling operations.

Closed molding means a grouping of processes for fabricating composites in a way that HAP-containing materials are not exposed to the atmosphere except during the material loading stage (*e.g.,* compression molding, injection molding, and resin transfer molding). Processes where the mold is covered with plastic (or equivalent material) prior to resin application, and the resin is injected into the covered mold are also considered closed molding.

Composite means a shaped and cured part produced by using composite materials.

Composite materials means the raw materials used to make composites. The raw materials include styrene containing resins. They may also include gel coat, monomer, catalyst, pigment, filler, and reinforcement.

Compression molding means a closed molding process for fabricating composites in which composite materials are placed inside matched dies that are used to cure the materials under heat and pressure without exposure to the atmosphere. The addition of mold paste or in-mold coating is considered part of the closed molding process. The composite materials used in this process are generally SMC or BMC.

Compression/injection molding means a grouping of processes that involves the use of compression molding and/or injection molding.

Continuous casting means a continuous process for fabricating composites in which composite materials are placed on an in-line conveyor belt to produce cast sheets that are cured in an oven.

Continuous lamination means a continuous process for fabricating composites in which composite materials are typically sandwiched between plastic films, pulled through compaction rollers, and cured in an oven. This process is generally used to produce flat or corrugated products on an in-line conveyor.

Continuous lamination/casting means a grouping of processes that involves the use of continuous lamination and/or continuous casting.

Controlled emissions means those organic HAP emissions that are vented from a control device to the atmosphere.

Corrosion-resistant gel coat means a gel coat used on a product made with a corrosion-resistant resin that has a corrosion-resistant end-use application.

Corrosion-resistant end-use applications means applications where the product is manufactured specifically for an application that requires a level of chemical inertness or resistance to chemical attack above that required for typical reinforced plastic composites products. These applications include, but are not limited to, chemical processing and storage; pulp and paper production; sewer and wastewater treatment; power generation; potable water transfer and storage; food and drug processing; pollution or odor control; metals production and plating; semiconductor manufacturing; petroleum production, refining, and storage; mining; textile production; nuclear materials storage; swimming pools; and cosmetic production, as well as end-use applications that require high strength resins.

Corrosion-resistant industry standard includes the following standards: ASME RTP-1 or Sect. X; ASTM D5364, D3299, D4097, D2996, D2997, D3262, D3517, D3754, D3840, D4024, D4160, D4161, D4162, D4184, D3982, or D3839; ANSI/AWWA C950; UL 215, 1316 or 1746, IAPMO PS-199, or written customer requirements for resistance to specified chemical environments.

Corrosion-resistant product means a product made with a corrosion-resistant resin and is manufactured to a corrosion-resistant industry standard, or a food contact industry standard, or is manufactured for corrosion-resistant end-use applications involving continuous or temporary chemical exposures.

Corrosion-resistant resin means a resin that either:

(1) Displays substantial retention of mechanical properties when undergoing ASTM C-581 coupon testing, where the resin is exposed for 6 months or more to one of the following materials: Material with a pH ≥ 12.0 or ≤ 3.0, oxidizing or reducing agents, organic solvents, or fuels or additives as defined in 40 CFR 79.2. In the coupon testing, the exposed resin needs to demonstrate a minimum of 50 percent retention of the relevant mechanical property compared to the same resin in unexposed condition. In addition, the exposed resin needs to demonstrate an increased retention of the relevant mechanical property of at least 20 percentage points when compared to a similarly exposed general-purpose resin. For example, if the general-purpose resin retains 45 percent of the relevant property when tested as specified above, then a corrosion-resistant resin needs to retain at least 65 percent (45 percent plus 20 percent) of its property. The general-purpose resin used in the test needs to have an average molecular weight of greater than 1,000, be formulated with a 1:2 ratio of maleic anhydride to phthalic anhydride and 100 percent diethylene glycol, and a styrene content between 43 to 48 percent; or

(2) Complies with industry standards that require specific exposure testing to corrosive media, such as UL 1316, UL 1746, or ASTM F-1216.

Doctor box means the box or trough on an SMC machine into which the liquid resin paste is delivered before it is metered onto the carrier film.

Filament application means an open molding process for fabricating composites in which reinforcements are fed through a resin bath and wound onto a rotating mandrel. The materials on the mandrel may be rolled out or worked by using nonmechanical tools prior to curing. Resin application to the reinforcement on the mandrel by means other than the resin bath, such as spray guns, pressure-fed rollers, flow coaters, or brushes is not considered filament application.

Filled Resin means that fillers have been added to a resin such that the amount of inert substances is at least 10 percent by weight of the total resin plus filler mixture. Filler putty made from a resin is considered a filled resin.

Fillers means inert substances dispersed throughout a resin, such as calcium carbonate, alumina trihydrate, hydrous aluminum silicate, mica, feldspar, wollastonite, silica, and talc. Materials that are not considered to be fillers are glass fibers or any type of reinforcement and microspheres.

Fire retardant gel coat means a gel coat used for products for which low-flame spread/low-smoke resin is used.

Fluid impingement technology means a spray gun that produces an expanding non-misting curtain of liquid by the impingement of low-pressure uninterrupted liquid streams.

Food contact industry standard means a standard related to food contact application contained in Food and Drug Administration's regulations at 21 CFR 177.2420.

Gel Coat means a quick-setting resin used to improve surface appearance and/or performance of composites. It can be used to form the surface layer of any composites other than those used for molds in tooling operations.

Gel coat application means a process where either clear production, pigmented production, white/off-white or tooling gel coat is applied.

HAP-containing materials storage means an ancillary process which involves keeping HAP-containing materials, such as resins, gel coats, catalysts, monomers, and cleaners, in containers or bulk storage tanks for any length of time. Containers may include small tanks, totes, vessels, and buckets.

High Performance gel coat means a gel coat used on products for which National Sanitation Foundation, United States Department of Agriculture, ASTM, durability, or other property testing is required.

High strength gel coat means a gel coat applied to a product that requires high strength resin.

High strength resins means polyester resins which have a casting tensile strength of 10,000 pounds per square inch or more and which are used for manufacturing products that have high strength requirements such as structural members and utility poles.

Injection molding means a closed molding process for fabricating composites in which composite materials are injected under pressure into a heated mold cavity that represents the exact shape of the product. The composite materials are cured in the heated mold cavity.

Low Flame Spread/Low Smoke Products means products that meet the following requirements. The products must meet both the applicable flame spread requirements and the applicable smoke requirements. Interior or exterior building application products must meet an ASTM E-84 Flame Spread Index of less than or equal to 25, and Smoke Developed Index of less than or equal to 450, or pass National Fire Protection Association 286 Room Corner Burn Test with no flash over and total smoke released not exceeding 1000 meters square. Mass transit application products must meet an ASTM E-162 Flame Spread Index of less than or equal to 35 and ASTM E662 Smoke Density Ds @ 1.5 minutes less than or equal to 100 and Ds @ 4 minutes less than to equal to 200. Duct application products must meet ASTM E084 Flame Spread Index less than or equal to 25 and Smoke Developed Index less than or equal to 50 on the interior and/or exterior of the duct.

Manual resin application means an open molding process for fabricating composites in which composite materials are applied to the mold by pouring or by using hands and nonmechanical tools, such as brushes and rollers. Materials are rolled out or worked by using nonmechanical tools prior to curing. The use of pressure-fed rollers and flow coaters to apply resin is not considered manual resin application.

Mechanical resin application means an open molding process for fabricating composites in which composite materials (except gel coat) are applied to the mold by using mechanical tools such as spray guns, pressure-fed rollers, and flow coaters. Materials are rolled out or worked by using nonmechanical tools prior to curing.

Mixing means the blending or agitation of any HAP-containing materials in vessels that are 5.00 gallons (18.9 liters) or larger, and includes the mixing of putties or polyputties. Mixing may involve the blending of resin, gel coat, filler, reinforcement, pigments, catalysts, monomers, and any other additives.

Mold means a cavity or matrix into or onto which the composite materials are placed and from which the product takes its form.

Neat gel coat means the resin as purchased for the supplier, but not including any inert fillers.

Neat gel coat plus means neat gel coat plus any organic HAP-containing materials that are added to the gel coat by the supplier or the facility, excluding catalysts and promoters. Neat gel coat plus does include any additions of styrene or methyl methacrylate monomer in any form, including in catalysts and promoters.

Neat resin means the resin as purchased from the supplier, but not including any inert fillers.

Neat resin plus means neat resin plus any organic HAP-containing materials that are added to the resin by the supplier or the facility. Neat resin plus does not include any added filler, reinforcements, catalysts, or promoters. Neat resin plus does include any additions of styrene or methyl methacrylate monomer in any form, including in catalysts and promoters.

Nonatomized mechanical application means the use of application tools other than brushes to apply resin and gel coat where the application tool has documentation provided by its manufacturer or user that this design of the application tool has been organic HAP emissions tested, and the test results showed that use of this application tool results in organic HAP emissions that are no greater than the organic HAP emissions predicted by the applicable nonatomized application equation(s) in Table 1 to this subpart. In addition, the device must be operated according to the manufacturer's directions, including instructions to prevent the operation of the device at excessive spray pressures. Examples of nonatomized application include flow coaters, pressure fed rollers, and fluid impingement spray guns.

Noncorrosion-resistant resin means any resin other than a corrosion-resistant resin or a tooling resin.

Noncorrosion-resistant product means any product other than a corrosion-resistant product or a mold.

Non-routine manufacture means that you manufacture parts to replace worn or damaged parts of a reinforced plastic composites product, or a product containing reinforced plastic composite parts, that was originally manufactured in another facility. For a part to qualify as non-routine manufacture, it must be used for repair or replacement, and the manufacturing schedule must be based on the current or anticipated repair needs of the reinforced plastic composites product, or a product containing reinforced plastic composite parts.

Operation means a specific process typically found at a reinforced plastic composites facility. Examples of operations are noncorrosion-resistant manual resin application, corrosion-resistant mechanical resin application, pigmented gel coat application, mixing and HAP-containing materials storage.

Operation group means a grouping of individual operations based primarily on mold type. Examples are open molding, closed molding, and centrifugal casting.

Open molding means a process for fabricating composites in a way that HAP-containing materials are exposed to the atmosphere. Open molding includes processes such as manual resin application, mechanical resin application, filament application, and gel coat application. Open molding also includes application of resins and gel coats to parts that have been removed from the open mold.

Pigmented gel coat means a gel coat that has a color, but does not contain 10 percent of more titanium dioxide by weight. It can be used to form the surface layer of any composites other than those used for molds in tooling operations.

Polymer casting means a process for fabricating composites in which composite materials are ejected from a casting machine or poured into an open, partially open, or closed mold and cured. After the composite materials are poured into the mold, they are not rolled out or worked while the mold is open, except for smoothing the material and/or vibrating the mold to remove bubbles. The composite materials may or may not include reinforcements. Products produced by the polymer casting process include cultured marble products and polymer concrete.

Preform Injection means a form of pultrusion where liquid resin is injected to saturate reinforcements in an enclosed system containing one or more chambers with openings only large enough to admit reinforcements. Resin, which drips out of the chamber(s) during the process, is collected in closed piping or covered troughs and then into a covered reservoir for recycle. Resin storage vessels, reservoirs, transfer systems, and collection systems are covered or shielded from the ambient air. Preform injection differs from direct die injection in that the injection chambers are not directly attached to the die.

Prepreg materials means reinforcing fabric received precoated with resin which is usually cured through the addition of heat.

Pultrusion means a continuous process for manufacturing composites that have a uniform cross-sectional shape. The process consists of pulling a fiber-reinforcing material through a resin impregnation chamber or bath and through a shaping die, where the resin is subsequently cured. There are several types of pultrusion equipment, such as open bath, resin injection, and direct die injection equipment.

Repair means application of resin or gel coat to a part to correct a defect, where the resin or gel coat application occurs after the part has gone through all the steps of its typical production process, or the application occurs outside

the normal production area. For purposes of this subpart, rerouting a part back through the normal production line, or part of the normal production line, is not considered repair.

Resin transfer molding means a process for manufacturing composites whereby catalyzed resin is transferred or injected into a closed mold in which fiberglass reinforcement has been placed.

Sheet molding compound (SMC) means a ready-to-mold putty-like molding compound that contains resin(s) processed into sheet form. The molding compound is sandwiched between a top and a bottom film. In addition to resin(s), it may also contain catalysts, fillers, chemical thickeners, mold release agents, reinforcements, and other ingredients. Sheet molding compound can be used in compression molding to manufacture reinforced plastic composites products.

Shrinkage controlled resin means a resin that when promoted, catalyzed, and filled according to the resin manufacturer's recommendations demonstrates less than 0.3 percent linear shrinkage when tested according to ASTM D2566.

SMC manufacturing means a process which involves the preparation of SMC.

Tooling gel coat means a gel coat that is used to form the surface layer of molds. Tooling gel coats generally have high heat distortion temperatures, low shrinkage, high barcol hardness, and high dimensional stability.

Tooling resin means a resin that is used to produce molds. Tooling resins generally have high heat distortion temperatures, low shrinkage, high barcol hardness, and high dimensional stability.

Uncontrolled oven organic HAP emissions means those organic HAP emissions emitted from the oven through closed vent systems to the atmosphere and not to a control device. These organic HAP emissions do not include organic HAP emissions that may escape into the workplace through the opening of panels or doors on the ovens or other similar fugitive organic HAP emissions in the workplace.

Uncontrolled wet-out area organic HAP emissions means any or all of the following: Organic HAP emissions from wet-out areas that do not have any capture and control, organic HAP emissions that escape from wet-out area enclosures, and organic HAP emissions from wet-out areas that are captured by an enclosure but are vented to the atmosphere and not to an add-on control device.

Unfilled means that there has been no addition of fillers to a resin or that less than 10 percent of fillers by weight of the total resin plus filler mixture has been added.

Vapor suppressant means an additive, typically a wax, that migrates to the surface of the resin during curing and forms a barrier to seal in the styrene and reduce styrene emissions.

Vapor-suppressed resin means a resin containing a vapor suppressant added for the purpose of reducing styrene emissions during curing.

White and off-white gel coat means a gel coat that contains 10 percent of more titanium dioxide by weight.

[68 FR 19402, Apr. 21, 2003, as amended at 70 FR 50129, Aug. 25, 2005]

Table 1 to Subpart WWWW of Part 63—Equations To Calculate Organic HAP Emissions Factors for Specific Open Molding and Centrifugal Casting Process Streams

Table 1 to Subpart WWWW of Part 63--Equations to Calculate Organic HAP Emissions Factors for Specific Open Molding and Centrifugal Casting Process Streams[1]

As specified in §63.5810, use the equations in the following table to calculate organic HAP emissions factors for specific open molding and centrifugal casting process streams:

If your operation type is a new or existing...	And you use...	With...	Use this organic HAP Emissions Factor (EF) Equation for materials with less than 33 percent organic HAP (19 percent organic HAP for nonatomized gel coat)[234]...	Use this organic HAP emissions Factor (EF) Equation for materials with 33 percent or more organic HAP (19 percent for nonatomized gel coat)[234]...
1. open molding operation	a. manual resin application	i. nonvapor-suppressed resin	EF = 0.126 x %HAP x 2000	EF = ((0.286 x %HAP)-0.0529) x 2000
		ii. vapor-suppressed resin	EF = 0.126 x %HAP x 2000 x (1-(0.5 x VSE factor))	EF = ((0.286 x %HAP)-0.0529) x 2000 x (1-(0.5 x VSE factor))
		iii. vacuum bagging/closed-mold curing with roll out	EF = 0.126 x %HAP x 2000 x 0.8	EF = ((0.286 x %HAP)-0.0529) x 2000 x 0.8
		iv. vacuum bagging/closed-mold curing without roll-out	EF = (0.126 x %HAP x 2000 x 0.5	EF = ((0.286 x %HAP)-0.0529) x 2000 x 0.5
	b. atomized mechanical resin application	i. nonvapor-suppressed resin	EF = 0.169 x %HAP x 2000	EF = ((0.714 x %HAP)-0.18) x 2000
		ii. vapor-suppressed resin	EF = 0.169 x %HAP x 2000 x (1-(0.45 x VSE factor))	EF = ((0.714 x %HAP)-0.18) x 2000 x (1-(0.45 x VSE factor))
		iii. vacuum bagging/closed-mold curing with roll-out	EF = 0.169 x %HAP x 2000 x 0.85	EF = ((0.714 x %HAP)-0.18) x 2000 x 0.85
		iv. vacuum bagging/closed-mold curing without roll-out	EF = 0.169 x %HAP x 2000 x 0.55	EF = ((0.714 x %HAP)-0.18) x 2000 x 0.55
	c. nonatomized mechanical resin application	i. nonvapor-suppressed resin	EF = 0.107 x %HAP x 2000	EF = ((0.157 x %HAP)-0.0165) x 2000
		ii. vapor-suppressed resin	EF = 0.107 x %HAP x 2000 x (1-(0.45 x VSE factor))	EF = ((0.157 x %HAP)-0.0165) x 2000 x (1-(0.45 x VSE factor))
		iii. closed-mold curing with roll-out	EF = 0.107 x %HAP x 2000 x 0.85	EF = ((0.157 x %HAP)-0.0165) x 2000 x 0.85
		iv. vacuum bagging/closed-mold curing without roll-out	EF = 0.107 x %HAP x 2000 x 0.55	EF = ((0.157 x %HAP)-0.0165) x 2000 x 0.55
	d. atomized mechanical resin application with robotic or automated spray control[5]	nonvapor-suppressed resin	EF = 0.169 x %HAP x 2000 x 0.77	EF = 0.77 x ((0.714 x %HAP)-0.18) x 2000
	e. filament application[6]	i. nonvapor-suppressed resin	EF = 0.184 x %HAP x 2000	EF = ((0.2746 x %HAP)-0.0298) x 2000
		ii. vapor-suppressed resin	EF = 0.12 x %HAP x 2000	EF = ((0.2746 x %HAP)-0.0298) x 2000 x 0.65
	f. atomized spray gel coat application	nonvapor-suppressed gel coat	EF = 0.445 x %HAP x 2000	EF = ((1.03646 x %HAP)-0.195) x 2000

	g. nonatomized spray gel coat application	nonvapor-suppressed gel coat	EF = 0.185 x %HAP x 2000	EF = ((0.4506 x %HAP)-0.0505) x 2000
	h. atomized spray gel coat application using robotic or automated spray	nonvapor-suppressed gel coat	EF = 0.445 x %HAP x 2000 x 0.73	EF = ((1.03646 x %HAP)-0.195) x 2000 x 0.73
2. centrifugal casting operations [7,8]	a. heated air blown through molds	nonvapor-suppressed resin	EF = 0.558 x (%HAP) x 2000	EF = 0.558 x (%HAP) x 2000
	b. vented molds, but air vented through the molds is not heated	nonvapor-suppressed resin	EF = 0.026 x (%HAP) x 2000	EF = 0.026 x (%HAP) x 2000

Footnotes to Table 1

[1] The equations in this table are intended for use in calculating emission factors to demonstrate compliance with the emission limits in subpart WWWW. These equations may not be the most appropriate method to calculate emission estimates for other purposes. However, this does not preclude a facilit from using the equations in this table to calculate emission factors for purposes other then rule compliance if these equations are the most accurate available.

[2] To obtain the organic HAP emissions factor value for an operation with an add-on control device multiply the EF above by the add-on control factor calculated using Equation 1 of §63.5810. The organic HAP emissions factors have units of lbs of organic HAP per ton of resin or gel coat applied.

[3] Percent HAP means total weight percent of organic HAP (styrene, methyl methacrylate, and any other organic HAP) in the resin or gel coat prior to the addition of fillers, catalyst, and promoters. Input the percent HAP as a decimal, i.e., 33 percent HAP should be input as 0.33, not 33.

[4] The VSE factor means the percent reduction in organic HAP emissions expressed as a decimal measured by the VSE test method of appendix A to this subpart.

[5] This equation is based on a organic HAP emissions factor equation developed for mechanical atomized controlled spray. It may only be used for automated or robotic spray systems with atomized spray. All spray operations using hand held spray guns must use the appropriate mechanical atomized or mechanical nonatomized organic HAP emissions factor equation. Automated or robotic spray systems using nonatomized spray should use the appropriate nonatomized mechanical resin application equation.

[6] Applies only to filament application using an open resin bath. If resin is applied manually or with a spray gun, use the appropriate manual or mechanical application organic HAP emissions factor equation.

[7] These equations are for centrifugal casting operations where the mold is vented during spinning. Centrifugal casting operations where the mold is completely sealed after resin injection are considered to be closed molding operations.

[8] If a centrifugal casting operation uses mechanical or manual resin application techniques to apply resin to an open centrifugal casting mold, use the appropriate open molding equation with covered cure and no rollout to determine an emission factor for operations prior to the closing of the centrifugal casting mold. If the closed centrifugal casting mold is vented during spinning, use the appropriate centrifugal casting equation to calculate an emission factor for the portion of the process where spinning and cure occur. If a centrifugal casting operation uses mechanical or manual resin application techniques to apply resin to an open centrifugal casting mold, and the mold is then closed and is not vented, treat the entire operation as open molding with covered cure and no rollout to determine emission factors.

[70 FR 50129, Aug. 26, 2005]

Table 2 to Subpart WWWW of Part 63—Compliance Dates for New and Existing Reinforced Plastic Composites Facilities

As required in §§ 63.5800 and 63.5840 you must demonstrate compliance with the standards by the dates in the following table:

If your facility is . . .	And . . .	Then you must comply by this date . . .
1. An existing source	a. Is a major source on or before the publication date of this subpart	i. April 21, 2006, or ii. You must accept and meet an enforceable HAP emissions limit below the major source threshold prior to April 21, 2006.
2. An existing source that is an area source	Becomes a major source after the publication date of this subpart	3 years after becoming a major source or April 21, 2006, whichever is later.
3. An existing source, and emits less than 100 tpy of organic HAP from the combination of all centrifugal casting and continuous lamination/casting operations at the time of initial compliance with this subpart	Subsequently increases its actual organic HAP emissions to 100 tpy or more from these operations, which requires that the facility must now comply with the standards in § 63.5805(b)	3 years of the date your semi-annual compliance report indicates your facility meets or exceeds the 100 tpy threshold.
4. A new source	Is a major source at startup	Upon startup or April 21, 2003, whichever is later.
5. A new source	Is an area source at startup and becomes a major source	Immediately upon becoming a major source.
6. A new source, and emits less than 100 tpy of organic HAP from the combination of all open molding, centrifugal casting, continuous lamination/casting, pultrusion, SMC and BMC manufacturing, and mixing operations at the time of initial compliance with this subpart	Subsequently increases its actual organic HAP emissions to 100 tpy or more from the combination of these operations, which requires that the facility must now meet the standards in § 63.5805(d)	3 years from the date that your semi-annual compliance report indicates your facility meets or exceeds the 100 tpy threshold.

Table 3 to Subpart WWWW of Part 63—Organic HAP Emissions Limits for Existing Open Molding Sources, New Open Molding Sources Emitting Less Than 100 TPY of HAP, and New and Existing Centrifugal Casting and Continuous Lamination/Casting Sources that Emit Less Than 100 TPY of HAP

As specified in § 63.5805, you must meet the following organic HAP emissions limits that apply to you:

If your operation type is . . .	And you use . . .	[1] Your organic HAP emissions limit is . . .
1. open molding—corrosion-resistant and/or high strength (CR/HS)	a. mechanical resin application b. filament application c. manual resin application	113 lb/ton. 171 lb/ton. 123 lb/ton.
2. open molding—non-CR/HS	a. mechanical resin application b. filament application c. manual resin application	88 lb/ton. 188 lb/ton. 87 lb/ton.
3. open molding—tooling	a. mechanical resin application b. manual resin application	254 lb/ton. 157 lb/ton.
4. open molding—low-flame spread/low-smoke products	a. mechanical resin application b. filament application c. manual resin application	497 lb/ton. 270 lb/ton. 238 lb/ton.

If your operation type is . . .	And you use . . .	[1] Your organic HAP emissions limit is . . .
5. open molding—shrinkage controlled resins [2]	a. mechanical resin application b. filament application c. manual resin application	354 lb/ton. 215 lb/ton. 180 lb/ton.
6. open molding—gel coat [3]	a. tooling gel coating b. white/off white pigmented gel coating c. all other pigmented gel coating d. CR/HS or high performance gel coat e. fire retardant gel coat f. clear production gel coat	440 lb/ton. 267 lb/ton. 377 lb/ton. 605 lb/ton. 854 lb/ton. 522 lb/ton.
7. centrifugal casting—CR/HS	a. resin application with the mold closed, and the mold is vented during spinning and cure b. resin application with the mold closed, and the mold is not vented during spinning and cure c. resin application with the mold open, and the mold is vented during spinning and cure d. resin application with the mold open, and the mold is not vented during spinning and cure	25 lb/ton.[4] NA—this is considered to be a closed molding operation. 25 lb/ton.[4] Use the appropriate open molding emission limit.[5]
8. centrifugal casting—non-CR/HS	a. resin application with the mold closed, and the mold is vented during spinning and cure b. resin application with the mold closed, and mold is not vented during the spinning and cure c. resin application with the mold open, and the mold is vented during spinning and cure d. resin application with the mold open, and the mold is not vented during spinning and cure	20 lb/ton.[4] NA—this is considered to be a closed molding operation. 20 lb/ton.[4] Use the appropriate open molding emission limit.[5]
9. pultrusion [6]	N/A	reduce total organic HAP emissions by at least 60 weight percent.
10. continuous lamination/casting	N/A	reduce total organic HAP emissions by at least 58.5 weight percent or not exceed an organic HAP emissions limit of 15.7 lbs of organic HAP per ton of neat resin plus and neat gel coat plus.

[1] Organic HAP emissions limits for open molding and centrifugal casting are expressed as lb/ton. You must be at or below these values based on a 12-month rolling average.

[2] This emission limit applies regardless of whether the shrinkage controlled resin is used as a production resin or a tooling resin.

[3] If you only apply gel coat with manual application, for compliance purposes treat the gel coat as if it were applied using atomized spray guns to determine both emission limits and emission factors. If you use multiple application methods and any portion of a specific gel coat is applied using nonatomized spray, you may use the nonatomized spray gel coat equation to calculate an emission factor for the manually applied portion of that gel coat. Otherwise, use the atomized spray gel coat application equation to calculate emission factors.

[4] For compliance purposes, calculate your emission factor using only the appropriate centrifugal casting equation in item 2 of Table 1 to this subpart, or a site specific emission factor for after the mold is closed as discussed in § 63.5796.

[5] Calculate your emission factor using the appropriate open molding covered cure emission factor in item 1 of Table 1 to this subpart, or a site specific emission factor as discussed in § 63.5796.

[6] Pultrusion machines that produce parts that meet the following criteria: 1,000 or more reinforcements or the glass equivalent of 1,000 ends of 113 yield roving or more; and have a cross sectional area of 60 square inches or more are not subject to this requirement. Their requirement is the work practice of air flow management which is described in Table 4 to this subpart.

[70 FR 50131, Aug. 25, 2005]

Table 4 to Subpart WWWW of Part 63—Work Practice Standards

As specified in § 63.5805, you must meet the work practice standards in the following table that apply to you:

For . . .	You must . . .
1. a new or existing closed molding operation using compression/injection molding	uncover, unwrap or expose only one charge per mold cycle per compression/injection molding machine. For machines with multiple molds, one charge means sufficient material to fill all molds for one cycle. For machines with robotic loaders, no more than one charge may be exposed prior to the loader. For machines fed by hoppers, sufficient material may be uncovered to fill the hopper. Hoppers must be closed when not adding materials. Materials may be uncovered to feed to slitting machines. Materials must be recovered after slitting.
2. a new or existing cleaning operation	not use cleaning solvents that contain HAP, except that styrene may be used as a cleaner in closed systems, and organic HAP containing cleaners may be used to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts resin.
3. a new or existing materials HAP-containing materials storage operation	keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety.
4. an existing or new SMC manufacturing operation	close or cover the resin delivery system to the doctor box on each SMC manufacturing machine. The doctor box itself may be open.
5. an existing or new SMC manufacturing operation	use a nylon containing film to enclose SMC.
6. all mixing or BMC manufacturing operations[1]	use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation.
7. all mixing or BMC manufacturing operations[1]	close any mixer vents when actual mixing is occurring, except that venting is allowed during addition of materials, or as necessary prior to adding materials or opening the cover for safety. Vents routed to a 95 percent efficient control device are exempt from this requirement.

For . . .	You must . . .
8. all mixing or BMC manufacturing operations[1]	keep the mixer covers closed while actual mixing is occurring except when adding materials or changing covers to the mixing vessels.
9. a new or existing pultrusion operation manufacturing parts that meet the following criteria: 1,000 or more reinforcements or the glass equivalent of 1,000 ends of 113 yield roving or more; and have a cross sectional area of 60 square inches or more that is not subject to the 95 percent organic HAP emission reduction requirement	i. not allow vents from the building ventilation system, or local or portable fans to blow directly on or across the wet-out area(s), ii. not permit point suction of ambient air in the wet-out area(s) unless that air is directed to a control device, iii. use devices such as deflectors, baffles, and curtains when practical to reduce air flow velocity across the wet-out area(s), iv. direct any compressed air exhausts away from resin and wet-out area(s),
	v. convey resin collected from drip-off pans or other devices to reservoirs, tanks, or sumps via covered troughs, pipes, or other covered conveyance that shields the resin from the ambient air, vi. cover all reservoirs, tanks, sumps, or HAP-containing materials storage vessels except when they are being charged or filled, and vii. cover or shield from ambient air resin delivery systems to the wet-out area(s) from reservoirs, tanks, or sumps where practical.

[1] Containers of 5 gallons or less may be open when active mixing is taking place, or during periods when they are in process (i.e., they are actively being used to apply resin). For polymer casting mixing operations, containers with a surface area of 500 square inches or less may be open while active mixing is taking place.

[70 FR 50133, Aug. 25, 2005]

Alternative Organic HAP Emissions Limits for Open Molding, Centrifugal Casting, and SMC Manufacturing Operations Where the Standards Are Based on a 95 Percent Reduction Requirement

As specified in § 63.5805, as an alternative to the 95 percent organic HAP emissions reductions requirement, you may meet the appropriate organic HAP emissions limits in the following table:

If your operation type is . . .	And you use . . .	LYour organic HAP emissions limit is a [1]. . .
1. Open molding—corrosion-resistant and/or high strength (CR/HS)	a. Mechanical resin application	6 lb/ton.
	b. Filament application	9 lb/ton.
	c. Manual resin application	7 lb/ton.
2. Open molding—non-CR/HS	a. mechanical resin application	13 lb/ton.
	b. Filament application	10 lb/ton.
	c. Manual resin application	5 lb/ton.
3. Open molding—tooling	a. Mechanical resin application	13 lb/ton.
	b. Manual resin application	8 lb/ton.
4. Open molding—low flame spread/low smoke products	a. Mechanical resin application	25 lb/ton.
	b. Filament application	14 lb/ton.
	c. Manual resin application	12 lb/ton.
5. Open molding—shrinkage controlled resins	a. Mechanical resin application	18 lb/ton.

If your operation type is . . .	And you use . . .	LYour organic HAP emissions limit is a [1]. . .
	b. Filament application	11 lb/ton.
	c. Manual resin application	9 lb/ton.
6. Open molding—gel coat [2]	a. Tooling gel coating	22 lb/ton.
	b. White/off white pigmented gel coating	22 lb/ton.
	c. All other pigmented gel coating	19 lb/ton.
	d. CR/HS or high performance gel coat	31 lb/ton.
	e. Fire retardant gel coat	43 lb/ton.
	f. Clear production gel coat	27 lb/ton.
7. Centrifugal casting—CR/HS [3,4]	A vent system that moves heated air through the mold	27 lb/ton.
8. Centrifugal casting—non-CR/HS [3,4]	A vent system that moves heated air through the mold	21 lb/ton.
7. Centrifugal casting—CR/HS [3,4]	A vent system that moves ambient air through the mold	2 lb/ton.
8. Centrifugal casting—non-CR/HS [3,4]	A vent system that moves ambient air through the mold	1 lb/ton.
9. SMC Manufacturing	N/A	2.4 lb/ton.

[1] Organic HAP emissions limits for open molding and centrifugal casting expressed as lb/ton are calculated using the equations shown in Table 1 to this subpart. You must be at or below these values based on a 12-month rolling average.

[2] These limits are for spray application of gel coat. Manual gel coat application must be included as part of spray gel coat application for compliance purposes using the same organic HAP emissions factor equation and organic HAP emissions limit. If you only apply gel coat with manual application, treat the manually applied gel coat as if it were applied with atomized spray for compliance determinations.

[3] Centrifugal casting operations where the mold is not vented during spinning and cure are considered to be closed molding and are not subject to any emissions limit. Centrifugal casting operations where the mold is not vented during spinning and cure, and the resin is applied to the open centrifugal casting mold using mechanical or manual open molding resin application techniques are considered to be open molding operations and the appropriate open molding emission limits apply.

[4] Centrifugal casting operations where the mold is vented during spinning and the resin is applied to the open centrifugal casting mold using mechanical or manual open molding resin application techniques, use the appropriate centrifugal casting emission limit to determine compliance. Calculate your emission factor using the appropriate centrifugal casting emission factor in Table 1 to this subpart, or a site specific emission factor as discussed in § 63.5796.

[68 FR 19402, Apr. 21, 2003, as amended at 70 FR 50133, Aug. 25, 2005]

Table 6 to Subpart WWWW of Part 63—Basic Requirements for Performance Tests, Performance Evaluations, and Design Evaluations for New and Existing Sources Using Add-On Control Devices

As required in § 63.5850 you must conduct performance tests, performance evaluations, and design evaluation according to the requirements in the following table:

For . . .	You must . . .	Using . . .	According to the following requirements . . .
1. Each enclosure used to collect and route organic HAP emissions to an add-on control device that is a PTE	Meet the requirements for a PTE	EPA method 204 of appendix M of 40 CFR part 51	Enclosures that meet the requirements of EPA Method 204 of appendix M of 40 CFR part 51 for a PTE are assumed to have a capture efficiency of 100%. Note that the criteria that all access doors and windows that are not treated as natural draft openings shall be closed during routine operation of the process is not intended to require that these doors and windows be closed at all times. It means that doors and windows must be closed any time that you are not actually moving parts or equipment through them. Also, any styrene retained in hollow parts and liberated outside the PTE is not considered to be a violation of the EPA Method 204 criteria.
2. Each enclosure used to collect and route organic HAP emissions to an add-on control device that is not a PTE	a. Determine the capture efficiency of each enclosure used to capture organic HAP emissions sent to an add-on control device	i. EPA methods 204B through E of appendix M of 40 CFR part 51, or	(1) Enclosures that do not meet the requirements for a PTE must determine the capture efficiency by constructing a temporary total enclosure according to the requirements of EPA Method 204 of appendix M of 40 CFR part 51 and measuring the mass flow rates of the organic HAP in the exhaust streams going to the atmosphere and to the control device. Test runs for EPA Methods 204B through E of appendix M of 40 CFR part 51 must be at least 3 hours.
		ii. An alternative test method that meets the requirements in 40 CFR part 51, appendix M	(1) The alternative test method must the data quality objectives and lower confidence limit approaches for alternative capture efficiency protocols requirements contained in 40 CFR part 63 subpart KK, appendix A.
3. Each control device used to comply with a percent reduction requirement, or an organic HAP emissions limit	Determine the control efficiency of each control device used to control organic HAP emissions	The test methods specified in § 63.5850 to this subpart	Testing and evaluation requirements are contained in 40 CFR part 63, subpart SS, and § 63.5850 to this subpart.
4. Determining organic HAP emission factors for any operation	Determine the mass organic HAP emissions rate	The test methods specified in § 63.5850 to this subpart	Testing and evaluation requirements are contained in 40 CFR part 63, subpart SS, and § 63.5850 to this subpart.

Table 7 to Subpart WWWW of Part 63—Options Allowing Use of the Same Resin Across Different Operations That Use the Same Resin Type

As specified in § 63.5810(d), when electing to use the same resin(s) for multiple resin application methods, you may use any resin(s) with an organic HAP content less than or equal to the values shown in the following table, or any combination of resins whose weighted average organic HAP content based on a 12-month rolling average is less than or equal to the values shown the following table:

If your facility has the following resin type and application method . . .	The highest resin weight is* * * percent organic HAP content, or weighted average weight percent organic HAP content, you can use for . . .	is . . .
1. CR/HS resins, centrifugal casting [1,2]	a. CR/HS mechanical	[3] 48.0
	b. CR/HS filament application	48.0
	c. CR/HS manual	48.0
2. CR/HS resins, nonatomized mechanical	a. CR/HS filament application	46.4
	b. CR/HS manual	46.4
3. CR/HS resins, filament application	CR/HS manual	42.0
4. non-CR/HS resins, filament application	a. non-CR/HS mechanical	[3] 45.0
	b. non-CR/HS manual	45.0
	c. non-CR/HS centrifugal casting [1,2]	45.0
5. non-CR/HS resins, nonatomized mechanical	a. non-CR/HS manual	38.5
	b. non-CR/HS centrifugal casting [1,2]	38.5
6. non-CR/HS resins, centrifugal casting [1,2]	non-CR/HS manual	37.5
7. tooling resins, nonatomized mechanical	tooling manual	91.4
8. tooling resins, manual	tooling atomized mechanical	45.9

[1] If the centrifugal casting operation blows heated air through the molds, then 95 percent capture and control must be used if the facility wishes to use this compliance option.

[2] If the centrifugal casting molds are not vented, the facility may treat the centrifugal casting operations as if they were vented if they wish to use this compliance option.

[3] Nonatomized mechanical application must be used.

[70 FR 50133, Aug. 25, 2005]

Table 8 to Subpart WWWW of Part 63—Initial Compliance With Organic HAP Emissions Limits

As specified in § 63.5860(a), you must demonstrate initial compliance with organic HAP emissions limits as specified in the following table:

For . . .	That must meet the following organic HAP emissions limit . . .	You have demonstrated initial compliance if . . .
1. open molding and centrifugal casting operations	a. an organic HAP emissions limit shown in Tables 3 or 5 to this subpart, or an organic HAP content limit shown in Table 7 to this subpart	i. you have met the appropriate organic HAP emissions limits for these operations as calculated using the procedures in § 63.5810 on a 12-month rolling average 1 year after the appropriate compliance date, and/or ii. you demonstrate that any individual resins or gel coats not included in (i) above, as applied, meet their applicable emission limits, or iii. you demonstrate using the appropriate values in Table 7 to this subpart that the weighted average of all resins and gel coats for each resin type and application method meet the appropriate organic HAP contents.
2. open molding centrifugal casting, continuous lamination/casting, SMC and BMC manufacturing, and mixing operations	a. reduce total organic HAP emissions by at least 95 percent by weight	total organic HAP emissions, based on the results of the capture efficiency and destruction efficiency testing specified in Table 6 to this subpart, are reduced by at least 95 percent by weight.
3. continuous lamination/casting operations	a. reduce total organic HAP emissions, by at least 58.5 weight percent, or	total organic HAP emissions, based on the results of the capture efficiency and destruction efficiency in Table 6 to this subpart and the calculation procedures specified in §§ 63.5865 through 63.5890, are reduced by at least 58.5 percent by weight.
	b. not exceed an organic HAP emissions limit of 15.7 lbs of organic HAP per ton of neat resin plus and neat gel coat plus	total organic HAP emissions, based on the results of the capture efficiency and destruction efficiency testing specified in Table 6 to this subpart and the calculation procedures specified in §§ 63.5865 through 63.5890, do not exceed 15.7 lbs of organic HAP per ton of neat resin plus and neat gel coat plus.
4. continuous lamination/casting operations	a. reduce total organic HAP emissions by at least 95 weight percent or	total organic HAP emissions, based on the results of the capture efficiency and destruction efficiency testing specified in Table 6 to this subpart and the calculation procedures specified in §§ 63.5865 through 63.5890, are reduced by at least 95 percent by weight
	b. not exceed an organic HAP emissions limit of 1.47 lbs of organic HAP per ton of neat resin plus and neat gel coat plus	total organic HAP emissions, based on the results of the capture efficiency and destruction efficiency testing specified in Table 6 and the calculation procedures specified in §§ 63.5865 through 63.5890, do not exceed 1.47 lbs of organic HAP of per ton of neat resin plus and neat gel coat plus.
5. pultrusion operations	a. reduce total organic HAP emissions by at least 60 percent by weight	i. total organic HAP emissions, based on the results of the capture efficiency and add-on control device destruction efficiency testing specified in Table 6 to this subpart, are reduced by at least 60 percent by weight, and/or ii. as part of the notification of initial compliance status, the owner/operator submits a certified statement that all pultrusion lines not controlled with an add-on control device, but for which an emission reduction is being claimed, are using direct die injection, and/or wet-area enclosures that meet the criteria of § 63.5830.

For . . .	That must meet the following organic HAP emissions limit . . .	You have demonstrated initial compliance if . . .
6. pultrusion operations	a. reduce total organic HAP emissions by at least 95 percent by weight	i. total organic HAP emissions, based on the results of the capture efficiency and add-on control device destruction efficiency testing specified in Table 6 to this subpart, are reduced by at least 95 percent by weight.

[70 FR 50134, Aug. 25, 2005]

Table 9 to Subpart WWWW of Part 63—Initial Compliance With Work Practice Standards

As specified in § 63.5860(a), you must demonstrate initial compliance with work practice standards as specified in the following table:

For . . .	That must meet the following standards . . .	You have demonstrated initial compliance if . . .
1. a new or existing closed molding operation using compression/injection molding	uncover, unwrap or expose only one charge per mold cycle per compression/injection molding machine. For machines with multiple molds, one charge means sufficient material to fill all molds for one cycle. For machines with robotic loaders, no more than one charge may be exposed prior to the loader. For machines fed by hoppers, sufficient material may be uncovered to fill the hopper. Hoppers must be closed when not adding materials. Materials may be uncovered to feed to slitting machines. Materials must be recovered after slitting	the owner or operator submits a certified statement in the notice of compliance status that only one charge is uncovered, unwrapped, or exposed per mold cycle per compression/injection molding machine, or prior to the loader, hoppers are closed except when adding materials, and materials are recovered after slitting.
2. a new or existing cleaning operation	not use cleaning solvents that contain HAP, except that styrene may be used in closed systems, and organic HAP containing materials may be used to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts resin between storage and applying resin to the mold or reinforcement	the owner or operator submits a certified statement in the notice of compliance status that all cleaning materials, except styrene contained in closed systems, or materials used to clean cured resin from application equipment, contain no HAP.
3. a new or existing materials HAP-containing materials storage operation	keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety	the owner or operator submits a certified statement in the notice of compliance status that all HAP-containing storage containers are kept closed or covered except when adding or removing materials, and that any bulk storage tanks are vented only as necessary for safety.
4. an existing or new SMC manufacturing operation	close or cover the resin delivery system to the doctor box on each SMC manufacturing machine. The doctor box itself may be open	the owner or operator submits a certified statement in the notice of compliance status that the resin delivery system is closed or covered.

For . . .	That must meet the following standards . . .	You have demonstrated initial compliance if . . .
5. an existing or new SMC manufacturing operation	use a nylon containing film to enclose SMC	the owner or operator submits a certified statement in the notice of compliance status that a nylon-containing film is used to enclose SMC.
6. an existing or new mixing or BMC manufacturing operation	use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation	the owner or operator submits a certified statement in the notice of compliance status that mixer covers are closed during mixing except when adding materials to the mixers, and that gaps around mixer shafts and required instrumentation are less than 1 inch.
7. an existing mixing or BMC manufacturing operation	not actively vent mixers to the atmosphere while the mixing agitator is turning, except that venting is allowed during addition of materials, or as necessary prior to adding materials for safety	the owner or operator submits a certified statement in the notice of compliance status that mixers are not actively vented to the atmosphere when the agitator is turning except when adding materials or as necessary for safety.
8. a new or existing mixing or BMC manufacturing operation	keep the mixer covers closed during mixing except when adding materials to the mixing vessels	the owner or operator submits a certified statement in the notice of compliance status that mixers closed except when adding materials to the mixing vessels.
9. a new or existing pultrusion operation manufacturing parts that meet the following criteria: 1,000 or more reinforcements or the glass equivalent of 1,000 ends of 113 yield roving or more; and have a cross sectional area of 60 square inches or more that is not subject to the 95 percent organic HAP emission reduction requirement	i. Not allow vents from the building ventilation system, or local or portable fans to blow directly on or across the wet-out area(s), ii. not permit point suction of ambient air in the wet-out area(s) unless that air is directed to a control device, iii. use devices such as deflectors, baffles, and curtains when practical to reduce air flow velocity across the wet-out area(s), iv. direct any compressed air exhausts away from resin and wet-out area(s), v. convey resin collected from drip-off pans or other devices to reservoirs, tanks, or sumps via covered troughs, pipes, or other covered conveyance that shields the resin from the ambient air, vi. clover all reservoirs, tanks, sumps, or HAP-containing materials storage vessels except when they are being charged or filled, and vii. cover or shield from ambient air resin delivery systems to the wet-out area(s) from reservoirs, tanks, or sumps where practical.	the owner or operator submits a certified statement in the notice of compliance status that they have complied with all the requirements listed in 9.i through 9.vii.

[70 FR 50135, Aug. 25, 2005]

Table 10 to Subpart WWWW of Part 63—Data Requirements for New and Existing Continuous Lamination Lines and Continuous Casting Lines Complying With a Percent Reduction Limit on a Per Line Basis

As required in § 63.5865(a), in order to comply with a percent reduction limit for continuous lamination lines and continuous casting lines you must determine the data in the following table:

For each line where the wet-out area . . .	And the oven . . .	You must determine . . .
1. Has an enclosure that is not a permanent total enclosure (PTE) and the captured organic HAP emissions are controlled by an add-on control device	a. Is uncontrolled	i. Annual uncontrolled wet-out area organic HAP emissions, ii. Annual controlled wet-out area organic HAP emissions, iii. Annual uncontrolled oven organic HAP emissions, iv. The capture efficiency of the wet-out area enclosure,
		v. The destruction efficiency of the add-on control device, and vi. The amount of neat resin plus and neat gel coat plus applied.
2. Has an enclosure that is a PTE and the captured organic HAP emissions are controlled by an add-on control device	a. Is uncontrolled	i. Annual uncontrolled wet-out area organic HAP emissions, ii. Annual controlled wet-out area organic HAP emissions, iii. Annual uncontrolled oven organic HAP emissions, iv. That the wet-out area enclosure meets the requirements of EPA Method 204 of appendix M to 40 CFR part 51 for a PTE, v. The destruction efficiency of the add-on control device, and vi. The amount of neat resin plus and neat gel coat plus applied.
3. Is uncontrolled	a. Is controlled by an add-on control device	i. Annual uncontrolled wet-out area organic HAP emissions, ii. Annual uncontrolled oven organic HAP emissions, iii. Annual controlled oven organic HAP emissions, iv. The capture efficiency of the oven, v. the destruction efficiency of the add-on control device, and vi. the amount of neat resin plus and neat gel coat plus applied.
4. Has an enclosure that is not a PTE and the captured organic HAP emissions are controlled by an add-on control device	a. Is controlled by an add-on control device	i. Annual uncontrolled wet-out area organic HAP emissions, ii. Annual controlled wet-out area organic HAP emissions, iii. Annual uncontrolled oven organic HAP emissions, iv. Annual controlled oven organic HAP emissions; v. The capture efficiency of the wet-out area enclosure, vi. Inlet organic HAP emissions to the add-on control device, vii. Outlet organic HAP emissions from the add-on control device, and viii. The amount of neat resin plus and neat gel coat plus applied.

For each line where the wet-out area . . .	And the oven . . .	You must determine . . .
5. Has an enclosure that is a PTE and the captured organic HAP emissions are controlled by an add-on control device	a. Is controlled by an add-on control device	i. That the wet-out area enclosure meets the requirements of EPA Method 204 of appendix M to 40 CFR part 51 for a PTE, ii. The capture efficiency of the oven, and
		iii. The destruction efficiency of the add-on control device.

Table 11 to Subpart WWWW of Part 63—Data Requirements for New and Existing Continuous Lamination and Continuous Casting Lines Complying With a Percent Reduction Limit or a Lbs/Ton Limit on an Averaging Basis

As required in § 63.5865, in order to comply with a percent reduction limit or a lbs/ton limit on an averaging basis for continuous lamination lines and continuous casting lines you must determine the data in the following table:

For each . . .	That . . .	You must determine . . .
1. Wet-out area	Is uncontrolled	Annual uncontrolled wet-out area organic HAP emissions.
2. Wet-out area	a. Has an enclosure that is not a PTE	i. The capture efficiency of the enclosure, and ii. Annual organic HAP emissions that escape the enclosure.
3. Wet-out area	Has an enclosure that is a PTE	That the enclosure meets the requirements of EPA Method 204 of appendix M to 40 CFR part 51 for a PTE.
4. Oven	Is uncontrolled	Annual uncontrolled oven organic HAP emissions.
5. Line	a. Is controlled or uncontrolled	i. The amount of neat resin plus applied, and ii. The amount of neat gel coat plus applied.
6. Add-on control device		i. Total annual inlet organic HAP emissions, and total annual outlet organic HAP emissions.

Table 12 to Subpart WWWW of Part 63—Data Requirements for New and Existing Continuous Lamination Lines and Continuous Casting Lines Complying With a Lbs/Ton Organic HAP Emissions Limit on a Per Line Basis

As required in § 63.5865(b), in order to comply with a lbs/ton organic HAP emissions limit for continuous lamination lines and continuous casting lines you must determine the data in the following table:

For each line where the wet- out area . . .	And the oven . . .	You must determine . . .
1. Is uncontrolled	a. Is uncontrolled	i. Annual uncontrolled wet-out area organic HAP emissions, ii. Annual uncontrolled oven organic HAP emissions, and iii. Annual neat resin plus and neat gel coat plus applied.
2. Has an enclosure that is not a PTE and the captured organic HAP emissions are controlled by an add-on control device	a. Is uncontrolled	i. Annual uncontrolled wet-out area organic HAP emissions, ii. Annual controlled wet-out area organic HAP emissions, iii. Annual uncontrolled oven organic HAP emissions,
		iv. The capture efficiency of the wet-out area enclosure, v. The destruction efficiency of the add-on control device, and vi. The amount of neat resin plus and neat gel coat plus applied.

For each line where the wet- out area . . .	And the oven . . .	You must determine . . .
3. Has an enclosure that is a PTE, and the captured organic HAP emissions are controlled by an add-on control device	a. Is uncontrolled	i. Annual uncontrolled wet-out area organic HAP emissions, ii. Annual controlled wet-out area organic HAP emissions, iii. Annual uncontrolled oven organic HAP emissions,
		iv. That the wet-out area enclosure meets the requirements of EPA Method 204 of appendix M to 40 CFR part 51 for a PTE, v. The destruction efficiency of the add-on control device, and vi. The amount of neat resin plus and neat gel coat plus applied.
4. Is uncontrolled	a. Is controlled by an add-on control device	i. Annual uncontrolled wet-out area organic HAP emissions, ii. Annual uncontrolled oven organic HAP emissions, iii. Annual controlled oven organic HAP emissions,
		iv. The capture efficiency of the oven, v. The destruction efficiency of the add-on control device, and vi. The amount of neat resin plus and neat gel coat plus applied.
5. Has an enclosure that is not a PTE and the captured organic HAP emissions are controlled by an add-on control device	a. Is controlled by an add-on control device	i. Annual uncontrolled wet-out area organic HAP emissions, ii. Annual controlled wet-out area organic HAP emissions, iii. Annual uncontrolled oven organic HAP emissions,
		iv. Annual controlled oven organic HAP emissions, v. The capture efficiency of the wet-out area enclosure, vi. The capture efficiency of the oven,
		vii. The destruction efficiency of the add-on control device, and viii. The amount of neat resin plus and neat gel coat plus applied.
6. Has an enclosure that is a PTE, and the captured organic HAP emissions are controlled by add-on control device	a. Is controlled by an add-on control device	i. That the wet-out area enclosure meets the requirements of EPA Method 204 of appendix M to 40 CFR part 51 for a PTE, ii. The capture efficiency of the oven, iii. Inlet organic HAP emissions to the an add-on control device, and
		iv. Outlet organic HAP emissions from the add-on control device.

Table 13 to Subpart WWWW of Part 63—Applicability and Timing of Notifications

As required in § 63.5905(a), you must determine the applicable notifications and submit them by the dates shown in the following table:

If your facility . . .	You must submit . . .	By this date . . .
1. Is an existing source subject to this subpart	An Initial Notification containing the information specified in § 63.9(b)(2)	No later than the dates specified in § 63.9(b)(2).
2. Is a new source subject to this subpart	The notifications specified in § 63.9(b)(4) and (5)	No later than the dates specified § 63.9(b)(4) and (5).
3. Qualifies for a compliance extension as specified in § 63.9(c)	A request for a compliance extension as specified in § 63.9(c)	No later than the dates specified in § 63.6(i).
4. Is complying with organic HAP emissions limit averaging provisions	A Notification of Compliance Status as specified in § 63.9(h)	No later than 1 year plus 30 days after your facility's compliance date.
5. Is complying with organic HAP content limits, application equipment requirements, or organic HAP emissions limit other than organic HAP emissions limit averaging	A Notification of Compliance Status as specified in § 63.9(h)	No later than 30 calendar days after your facility's compliance date.
6. Is complying by using an add-on control device	a. A notification of intent to conduct a performance test as specified in § 63.9(e)	No later than the date specified in § 63.9(e).
	b. A notification of the date for the CMS performance evaluation as specified in § 63.9(g)	The date of submission of notification of intent to conduct a performance test.
	c. A Notification of Compliance Status as specified in § 63.9(h)	No later than 60 calendar days after the completion of the add-on control device performance test and CMS performance evaluation.

Table 14 to Subpart WWWW of Part 63—Requirements for Reports

As required in § 63.5910(a), (b), (g), and (h), you must submit reports on the schedule shown in the following table:

You must submit a(n)	The report must contain . . .	You must submit the report . . .
1. Compliance report	a. A statement that there were no deviations during that reporting period if there were no deviations from any emission limitations (emission limit, operating limit, opacity limit, and visible emission limit) that apply to you and there were no deviations from the requirements for work practice standards in Table 4 to this subpart that apply to you. If there were no periods during which the CMS, including CEMS, and operating parameter monitoring systems, was out of control as specified in § 63.8(c)(7), the report must also contain a statement that there were no periods during which the CMS was out of control during the reporting period	Semiannually according to the requirements in § 63.5910(b).

You must submit a(n)	The report must contain . . .	You must submit the report . . .
	b. The information in § 63.5910(d) if you have a deviation from any emission limitation (emission limit, operating limit, or work practice standard) during the reporting period. If there were periods during which the CMS, including CEMS, and operating parameter monitoring systems, was out of control, as specified in § 63.8(c)(7), the report must contain the information in § 63.5910(e)	Semiannually according to the requirements in § 63.5910(b).
	c. The information in § 63.10(d)(5)(i) if you had a startup, shutdown or malfunction during the reporting period, and you took actions consistent with your startup, shutdown, and malfunction plan	Semiannually according to the requirements in § 63.5910(b).
2. An immediate startup, shutdown, and malfunction report if you had a startup, shutdown, or malfunction during the reporting period that is not consistent with your startup, shutdown, and malfunction plan	a. Actions taken for the event	By fax or telephone within 2 working days after starting actions inconsistent with the plan.
	b. The information in § 63.10(d)(5)(ii)	By letter within 7 working days after the end of the event unless you have made alternative arrangements with the permitting authority. (§ 63.10(d)(5)(ii)).

Table 15 to Subpart WWWW of Part 63—Applicability of General Provisions (Subpart A) to Subpart WWWW of Part 63

As specified in § 63.5925, the parts of the General Provisions which apply to you are shown in the following table:

The general provisions reference . . .	That addresses . . .	And applies to subpart WWWW of part 63 . . .	Subject to the following additional information . . .
§ 63.1(a)(1)	General applicability of the general provisions	Yes	Additional terms defined in subpart WWWW of Part 63, when overlap between subparts A and WWWW of Part 63 of this part, subpart WWWW of Part 63 takes precedence.
§ 63.1(a)(2) through (4)	General applicability of the general provisions	Yes	
§ 63.1(a)(5)	Reserved	No	
§ 63.1(a)(6)	General applicability of the general provisions	Yes	
§ 63.1(a)(7) through (9)	Reserved	No	
§ 63.1(a)(10) through (14)	General applicability of the general provisions	Yes	

The general provisions reference . . .	That addresses . . .	And applies to subpart WWWW of part 63 . . .	Subject to the following additional information . . .
§ 63.1(b)(1)	Initial applicability determination	Yes	Subpart WWWW of Part 63 clarifies the applicability in §§ 63.5780 and 63.5785.
§ 63.1(b)(2)	Reserved	No.	
§ 63.1(b)(3)	Record of the applicability determination	Yes	
§ 63.1(c)(1)	Applicability of this part after a relevant standard has been set under this part	Yes	Subpart WWWW of Part 63 clarifies the applicability of each paragraph of subpart A to sources subject to subpart WWWW of Part 63.
§ 63.1(c)(2)	Title V operating permit requirement	Yes	All major affected sources are required to obtain a title V operating permit. Area sources are not subject to subpart WWWW of Part 63.
§ 63.1(c)(3) and (4)	Reserved	No	
§ 63.1(c)(5)	Notification requirements for an area source that increases HAP emissions to major source levels	Yes	
§ 63.1(d)	Reserved	No	
§ 63.1(e)	Applicability of permit program before a relevant standard has been set under this part	Yes	
§ 63.2	Definitions	Yes	Subpart WWWW of Part 63 defines terms in § 63.5935. When overlap between subparts A and WWWW of Part 63 occurs, you must comply with the subpart WWWW of Part 63 definitions, which take precedence over the subpart A definitions.
§ 63.3	Units and abbreviations	Yes	Other units and abbreviations used in subpart WWWW of Part 63 are defined in subpart WWWW of Part 63.
§ 63.4	Prohibited activities and circumvention	Yes	§ 63.4(a)(3) through (5) is reserved and does not apply.
§ 63.5(a)(1) and (2)	Applicability of construction and reconstruction	Yes	Existing facilities do not become reconstructed under subpart WWWW of Part 63.
§ 63.5(b)(1)	Relevant standards for new sources upon construction	Yes	Existing facilities do not become reconstructed under subpart WWWW of Part 63.
§ 63.5(b)(2)	Reserved	No	
§ 63.5(b)(3)	New construction/reconstruction	Yes	Existing facilities do not become reconstructed under subpart WWWW of Part 63.
§ 63.5(b)(4)	Construction/reconstruction notification	Yes	Existing facilities do not become reconstructed under subpart WWWW of Part 63.
§ 63.5(b)(5)	Reserved	No	

The general provisions reference . . .	That addresses . . .	And applies to subpart WWWW of part 63 . . .	Subject to the following additional information . . .
§ 63.5(b)(6)	Equipment addition or process change	Yes	Existing facilities do not become reconstructed under subpart WWWW of Part 63.
§ 63.5(c)	Reserved	No	
§ 63.5(d)(1)	General application for approval of construction or reconstruction	Yes	Existing facilities do not become reconstructed under subpart WWWW of Part 63.
§ 63.5(d)(2)	Application for approval of construction	Yes	
§ 63.5(d)(3)	Application for approval of reconstruction	No	
§ 63.5(d)(4)	Additional information	Yes	
§ 63.5(e)(1) through (5)	Approval of construction or reconstruction	Yes	
§ 63.5(f)(1) and (2)	Approval of construction or reconstruction based on prior State preconstruction review	Yes	
§ 63.6(a)(1)	Applicability of compliance with standards and maintenance requirements	Yes	
§ 63.6(a)(2)	Applicability of area sources that increase HAP emissions to become major sources	Yes	
§ 63.6(b)(1) through (5)	Compliance dates for new and reconstructed sources	Yes	Subpart WWWW of Part 63 clarifies compliance dates in § 63.5800.
§ 63.6(b)(6)	Reserved	No	
§ 63.6(b)(7)	Compliance dates for new operations or equipment that cause an area source to become a major source	Yes	New operations at an existing facility are not subject to new source standards.
§ 63.6(c)(1) and (2)	Compliance dates for existing sources	Yes	Subpart WWWW of Part 63 clarifies compliance dates in § 63.5800.
§ 63.6(c)(3) and (4)	Reserved	No	
§ 63.6(c)(5)	Compliance dates for existing area sources that become major	Yes	Subpart WWWW of Part 63 clarifies compliance dates in § 63.5800.
§ 63.6(d)	Reserved	No	
§ 63.6(e)(1) and (2)	Operation & maintenance requirements	Yes	
§ 63.6(e)(3)	Startup, shutdown, and malfunction plan and recordkeeping	Yes	Subpart WWWW of Part 63 requires a startup, shutdown, and malfunction plan only for sources using add-on controls.
§ 63.6(f)(1)	Compliance except during periods of startup, shutdown, and malfunction	No	Subpart WWWW of Part 63 requires compliance during periods of startup, shutdown, and malfunction, except startup, shutdown, and malfunctions for sources using add-on controls.
§ 63.6(f)(2) and (3)	Methods for determining compliance	Yes	
§ 63.6(g)(1) through (3)	Alternative standard	Yes	

The general provisions reference . . .	That addresses . . .	And applies to subpart WWWW of part 63 . . .	Subject to the following additional information . . .
§ 63.6(h)	Opacity and visible emission Standards	No	Subpart WWWW of Part 63 does not contain opacity or visible emission standards.
§ 63.6(i)(1) through (14)	Compliance extensions	Yes	
§ 63.6(i)(15)	Reserved	No	
§ 63.6(i)(16)	Compliance extensions	Yes	
§ 63.6(j)	Presidential compliance exemption	Yes	
§ 63.7(a)(1)	Applicability of performance testing requirements	Yes	
§ 63.7(a)(2)	Performance test dates	No	Subpart WWWW of Part 63 initial compliance requirements are in § 63.5840.
§ 63.7(a)(3)	CAA Section 114 authority	Yes	
§ 63.7(b)(1)	Notification of performance test	Yes	
§ 63.7(b)(2)	Notification rescheduled performance test	Yes	
§ 63.7(c)	Quality assurance program, including test plan	Yes	Except that the test plan must be submitted with the notification of the performance test.
§ 63.7(d)	Performance testing facilities	Yes	
§ 63.7(e)	Conditions for conducting performance tests	Yes	Performance test requirements are contained in § 63.5850. Additional requirements for conducting performance tests for continuous lamination/casting are included in § 63.5870.
§ 63.7(f)	Use of alternative test method	Yes	
§ 63.7(g)	Performance test data analysis, recordkeeping, and reporting	Yes	
§ 63.7(h)	Waiver of performance tests	Yes	
§ 63.8(a)(1) and (2)	Applicability of monitoring requirements	Yes	
§ 63.8(a)(3)	Reserved	No	
§ 63.8(a)(4)	Monitoring requirements when using flares	Yes	
§ 63.8(b)(1)	Conduct of monitoring exceptions	Yes	
§ 63.8(b)(2) and (3)	Multiple effluents and multiple monitoring systems	Yes	
§ 63.8(c)(1)	Compliance with CMS operation and maintenance requirements	Yes	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
§ 63.8(c)(2) and (3)	Monitoring system installation	Yes	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
§ 63.8(c)(4)	CMS requirements	Yes	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.

The general provisions reference . . .	That addresses . . .	And applies to subpart WWWW of part 63 . . .	Subject to the following additional information . . .
§ 63.8(c)(5)	Continuous Opacity Monitoring System (COMS) minimum procedures	No	Subpart WWWW of Part 63 does not contain opacity standards.
§ 63.8(c)(6) through (8)	CMS calibration and periods CMS is out of control	Yes	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
§ 63.8(d)	CMS quality control program, including test plan and all previous versions	Yes	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
§ 63.8(e)(1)	Performance evaluation of CMS	Yes	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
§ 63.8(e)(2)	Notification of performance evaluation	Yes	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
§ 63.8(e)(3) and (4)	CMS requirements/alternatives	Yes	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
§ 63.8(e)(5)(i)	Reporting performance evaluation results	Yes	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
§ 63.8(e)(5)(ii)	Results of COMS performance evaluation	No	Subpart WWWW of Part 63 does not contain opacity standards.
§ 63.8(f)(1) through (3)	Use of an alternative monitoring method	Yes	
§ 63.8(f)(4)	Request to use an alternative monitoring method	Yes	
§ 63.8(f)(5)	Approval of request to use an alternative monitoring method	Yes	
§ 63.8(f)(6)	Request for alternative to relative accuracy test and associated records	Yes	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
§ 63.8(g)(1) through (5)	Data reduction	Yes	
§ 63.9(a)(1) through (4)	Notification requirements and general information	Yes	
§ 63.9(b)(1)	Initial notification applicability	Yes	
§ 63.9(b)(2)	Notification for affected source with initial startup before effective date of standard	Yes	
§ 63.9(b)(3)	Reserved	No	
§ 63.9(b)(4)(i)	Notification for a new or reconstructed major affected source with initial startup after effective date for which an application for approval of construction or reconstruction is required	Yes	
§ 63.9(b)(4)(ii) through (iv)	Reserved	No	

The general provisions reference . . .	That addresses . . .	And applies to subpart WWWW of part 63 . . .	Subject to the following additional information . . .
§ 63.9(b)(4)(v)	Notification for a new or reconstructed major affected source with initial startup after effective date for which an application for approval of construction or reconstruction is required	Yes	Existing facilities do not become reconstructed under subpart WWWW of Part 63.
§ 63.9(b)(5)	Notification that you are subject to this subpart for new or reconstructed affected source with initial startup after effective date and for which an application for approval of construction or reconstruction is not required	Yes	Existing facilities do not become reconstructed under subpart WWWW of Part 63.
§ 63.9(c)	Request for compliance extension	Yes	
§ 63.9(d)	Notification of special compliance requirements for new source	Yes	
§ 63.9(e)	Notification of performance test	Yes	
§ 63.9(f)	Notification of opacity and visible emissions observations	No	Subpart WWWW of Part 63 does not contain opacity or visible emission standards.
§ 63.9(g)(1)	Additional notification requirements for sources using CMS	Yes	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
§ 63.9(g)(2)	Notification of compliance with opacity emission standard	No	Subpart WWWW of Part 63 does not contain opacity emission standards.
§ 63.9(g)(3)	Notification that criterion to continue use of alternative to relative accuracy testing has been exceeded	Yes	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
§ 63.9(h)(1) through (3)	Notification of compliance status	Yes	
§ 63.9(h)(4)	Reserved	No	
§ 63.9(h)(5) and (6)	Notification of compliance status	Yes	
§ 63.9(i)	Adjustment of submittal deadlines	Yes	
§ 63.9(j)	Change in information provided	Yes	
§ 63.10(a)	Applicability of recordkeeping and reporting	Yes	
§ 63.10(b)(1)	Records retention	Yes	
§ 63.10(b)(2)(i) through (v)	Records related to startup, shutdown, and malfunction	Yes	Only applies to facilities that use an add-on control device.
§ 63.10(b)(2)(vi) through (xi)	CMS records, data on performance tests, CMS performance evaluations, measurements necessary to determine conditions of performance tests, and performance evaluations	Yes	
§ 63.10(b)(2)(xii)	Record of waiver of recordkeeping and reporting	Yes	
§ 63.10(b)(2)(xiii)	Record for alternative to the relative accuracy test	Yes	
§ 63.10(b)(2)(xiv)	Records supporting initial notification and notification of compliance status	Yes	

The general provisions reference . . .	That addresses . . .	And applies to subpart WWWW of part 63 . . .	Subject to the following additional information . . .
§ 63.10(b)(3)	Records for applicability determinations	Yes	
§ 63.10(c)(1)	CMS records	Yes	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
§ 63.10(c)(2) through (4)	Reserved	No	
§ 63.10(c)(5) through (8)	CMS records	Yes	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
§ 63.10(c)(9)	Reserved	No	
§ 63.10(c)(10) through (15)	CMS records	Yes	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
§ 63.10(d)(1)	General reporting requirements	Yes	
§ 63.10(d)(2)	Report of performance test results	Yes	
§ 63.10(d)(3)	Reporting results of opacity or visible emission observations	No	Subpart WWWW of Part 63 does not contain opacity or visible emission standards.
§ 63.10(d)(4)	Progress reports as part of extension of compliance	Yes	
§ 63.10(d)(5)	Startup, shutdown, and malfunction reports	Yes	Only applies if you use an add-on control device.
§ 63.10(e)(1) through (3)	Additional reporting requirements for CMS	Yes	This section applies if you have an add-on control device and elect to use a CEM to demonstrate continuous compliance with an emission limit.
§ 63.10(e)(4)	Reporting COMS data	No	Subpart WWWW of Part 63 does not contain opacity standards.
§ 63.10(f)	Waiver for recordkeeping or reporting	Yes	
§ 63.11	Control device requirements	Yes	Only applies if you elect to use a flare as a control device.
§ 63.12	State authority and delegations	Yes	
§ 63.13	Addresses of State air pollution control agencies and EPA Regional Offices	Yes	
§ 63.14	Incorporations by reference	Yes	
§ 63.15	Availability of information and confidentiality	Yes	

Appendix A to Subpart WWWW of Part 63—Test Method for Determining Vapor Suppressant Effectiveness

1. Scope and Application

1.1 *Applicability.* If a facility is using vapor suppressants to reduce hazardous air pollutant (HAP) emissions, the organic HAP emission factor equations in Table 1 to this subpart require that the vapor suppressant effectiveness factor be determined. The vapor suppressant effectiveness factor is then used as one of the inputs into the appropriate organic HAP emission factor equation. The vapor suppressant effectiveness factor test is not intended to quantify overall volatile emissions from a resin, nor to be used as a stand-alone test for emissions determination. This test is designed to evaluate the performance of film forming vapor suppressant resin additives. The results of this test

are used only in combination with the organic HAP emissions factor equations in Table 1 to this subpart to generate emission factors.

1.1.1 The open molding process consists of application of resin and reinforcements to the mold surface, followed by a manual rollout process to consolidate the laminate, and the curing stage where the laminate surface is not disturbed. Emission studies have shown that approximately 50 percent to 55 percent of the emissions occur while the resin is being applied to the mold. Vapor suppressants have little effect during this portion of the lamination process, but can have a significant effect during the curing stage. Therefore, if a suppressant is 100 percent effective, the overall emissions from the process would be reduced by 45 percent to 50 percent, representing the emissions generated during the curing stage. In actual practice, vapor suppressant effectiveness will be less than 100 percent and the test results determine the specific effectiveness in terms of the vapor suppressant effectiveness factor. This factor represents the effectiveness of a specific combination of suppressant additive and resin formulation.

1.1.2 A resin manufacturer may supply a molder with a vapor-suppressed resin, and employ this test to provide the molder with the vapor suppressant effectiveness factor for that combination of resin and vapor suppressant. The factor qualifies the effectiveness of the vapor suppressant when the resin is tested in the specific formulation supplied to the molder. The addition of fillers or other diluents by the molder may impact the effectiveness of the vapor suppressant. The formulation, including resin/glass ratio and filler content, used in the test should be similar to the formulation to be used in production. The premise of this method is to compare laminate samples made with vapor suppressant additive and made without the additive. The difference in emissions between the two yields the vapor suppressant effectiveness factor.

1.1.3 The method uses a mass balance determination to establish the relative loss of the volatile component from unsaturated polyester or vinyl ester resins, with and without vapor suppressant additives. The effectiveness of a specific vapor suppressant and resin mixture is determined by comparing the relative volatile weight losses from vapor suppressed and non-suppressed resins. The volatile species are not separately analyzed. While the species contained in the volatile component are not determined, an extended listing of potential monomer that may be contained in unsaturated polyester or vinyl ester resins is provided in Table 1.1. However, most polyester and vinyl ester resin formulations presently used by the composites industry only contain styrene monomer.

Table 1.1—List of Monomers Potentially Present in Unsaturated Polyester/Vinyl Ester Resins

Monomer	CAS No.
Styrene	100-42-5.
Vinyl toluene	25013-15-4.
Methyl methacrylate	80-62-6.
Alpha methyl styrene	98-83-9.
Para methyl styrene	Vinyl toluene isomer.
Chlorostyrene	1331-28-8.
Diallyl phthalate	131-17-9.
Other volatile monomers	Various.

2. Summary of Method

2.1 Differences in specific resin and suppressant additive chemistry affect the performance of a vapor suppressant. The purpose of this method is to quantify the effectiveness of a specific combination of vapor suppressant and unsaturated polyester or vinyl ester resin as they are to be used in production. This comparative test quantifies the loss of volatiles from a fiberglass reinforced laminate during the roll-out and curing emission phases, for resins formulated with and without a suppressant additive. A criterion for this method is the testing of a non-vapor suppressed resin system and testing the same resin with a vapor suppressant. The two resins are as identical as possible with the exception of the addition of the suppressant to one. The exact formulation used for the test will be determined by the in-use production requirements. Each formulation of resin, glass, fillers, and additives is developed to meet particular customer and or performance specifications.

2.2 The result of this test is used as an input factor in the organic HAP emissions factor equations in Table 1 to this subpart, which allows these equations to predict emissions from a specific combination of resin and suppressant. This test does not provide an emission rate for the entire lamination process.

3. Definitions and Acronyms

3.1 Definitions

3.1.1 *Vapor suppressant.* An additive that inhibits the evaporation of volatile components in unsaturated polyester or vinyl ester resins.

3.1.2 *Unsaturated polyester resin.* A thermosetting resin commonly used in composites molding.

3.1.3 *Unsaturated vinyl ester resin.* A thermosetting resin used in composites molding for corrosion resistant and high performance applications.

3.1.4 *Laminate.* A combination of fiber reinforcement and a thermoset resin.

3.1.5 *Chopped strand mat.* Glass fiber reinforcement with random fiber orientation.

3.1.6 *Initiator.* A curing agent added to an unsaturated polyester or vinyl ester resin.

3.1.7 *Resin application roller.* A tool used to saturate and compact a wet laminate.

3.1.8 *Gel time.* The time from the addition of initiator to a resin to the state of resin gelation.

3.1.9 *Filled resin system.* A resin, which includes the addition of inert organic or inorganic materials to modify the resin properties, extend the volume and to lower the cost. Fillers include, but are not limited to; mineral particulates; microspheres; or organic particulates. This test is not intended to be used to determine the vapor suppressant effectiveness of a filler.

3.1.10 *Material safety data sheet.* Data supplied by the manufacturer of a chemical product, listing hazardous chemical components, safety precautions, and required personal protection equipment for a specific product.

3.1.11 *Tare(ed).* Reset a balance to zero after a container or object is placed on the balance; that is to subtract the weight of a container or object from the balance reading so as to weigh only the material placed in the container or on the object.

3.1.12 *Percent glass.* The specified glass fiber weight content in a laminate. It is usually determined by engineering requirements for the laminate.

3.2 Acronyms:

3.2.1 *VS* —vapor suppressed or vapor suppressant.

3.2.2 *NVS* —non-vapor suppressed.

3.2.3 *VSE* —vapor suppressant effectiveness.

3.2.4 *VSE Factor* —vapor suppressant effectiveness, factor used in the equations in Table 1 to this subpart.

3.2.5 *CSM* —chopped strand mat.

3.2.6 *MSDS* —material safety data sheet.

4. Interferences

There are no identified interferences which affect the results of this test.

5. Safety

Standard laboratory safety procedures should be used when conducting this test. Refer to specific MSDS for handling precautions.

6. Equipment and Supplies

NOTE: Mention of trade names or specific products or suppliers does not constitute an endorsement by the Environmental Protection Agency.

6.1 Required Equipment.

6.1.1 Balance enclosure.[1]

6.1.2 Two (2) laboratory balances—accurate to ±0.01g.[2]

6.1.3 Stop watch or balance data recording output to data logger with accuracy ±1 second.[3]

6.1.4 Thermometer—accurate to ±2.0 °F(±1.0 °C).[4]

6.1.5 A lipped pan large enough to hold the cut glass without coming into contact with the vertical sides, *e.g.* a pizza pan.[5]

6.1.6 Mylar film sufficient to cover the bottom of the pan.[6]

6.1.7 Tape to keep the Mylar from shifting in the bottom of the pan.[7]

6.1.8 Plastic tri-corner beakers of equivalent—250 ml to 400 ml capacity.[8]

6.1.9 Eye dropper or pipette.[9]

6.1.10 Disposable resin application roller, $^{3}/_{16}$ ″- $^{3}/_{4}$ ″ diameter × 3″-6″ roller length.[10]

6.1.11 Hygrometer or psychrometer [11] accurate to ±5 percent

6.1.12 Insulating board, (Teflon, cardboard, foam board etc.) to prevent the balance from becoming a heat sink.[12]

6.2 Optional Equipment.

6.2.1 Laboratory balance—accurate to ±.01g with digital output, such as an RS-232 bi-directional interface [13] for use with automatic data recording devices.

6.2.2 Computer with recording software configured to link to balance digital output. Must be programmed to record data at the minimum intervals required for manual data acquisition.

6.3 Supplies.

6.3.1 Chopped strand mat—1.5 oz/ft.[2] [14]

7. Reagents and Standards

7.1 *Initiator.* The initiator type, brand, and concentration will be specified by resin manufacturer, or as required by production operation.

7.2 Polyester or vinyl ester resin.

7.3 Vapor suppressant additive.

8. Sample Collection, Preservation, and Storage

This test method involves the immediate recording of data during the roll out and curing phases of the lamination process during each test run. Samples are neither collected, preserved, nor stored.

9. Quality Control

Careful attention to the prescribed test procedure, routing equipment calibration, and replicate testing are the quality control activities for this test method. Refer to the procedures in section 11. A minimum of six test runs of a resin system without a suppressant and six test runs of the same resin with a suppressant shall be performed for each resin and suppressant test combination.

10. Calibration and Standardization

10.1 The laboratory balances, stopwatch, hygrometer and thermometer shall be maintained in a state of calibration prior to testing and thereafter on a scheduled basis as determined by the testing laboratory. This shall be accomplished by using certified calibration standards.

10.2 Calibration records shall be maintained for a period of 3 years.

11. Test Procedure

11.1 Test Set-up.

11.1.1 The laboratory balance is located in an enclosure to prevent fluctuations in balance readings due to localized air movement. The front of enclosure is open to permit work activity, but positioned so that local airflow will not effect balance readings. The ambient temperature is determined by suspending the thermometer at a point inside the enclosure.

11.1.2 The bottom of the aluminum pan is covered with the Mylar film. The film is held in position with tape or by friction between the pan and the film.

11.1.3 The resin and pan are brought to room temperature. This test temperature must be between 70 °F and 80 °F. The testing temperature cannot vary more than ±2 °F during the measurement of test runs. Temperature shall be recorded at the same time weight is recorded on suppressed and non-suppressed test data sheets, shown in Table 17.1.

11.1.4 The relative humidity may not change more than ±15 percent during the test runs. This is determined by recording the relative humidity in the vicinity of the test chamber at the beginning and end of an individual test run. This data is recorded on the test data sheets shown in Table 17.1.

11.1.5 Two plies of nominal 1.5 oz/ft^2 chopped strand mat (CSM) are cut into a square or rectangle with the minimum surface area of 60 square inches (*i.e.* a square with a side dimension of 7.75 inches).

11.1.6 The appropriate resin application roller is readily available.

11.2 Resin Gel Time/Initiator Percentage

11.2.1 Previous testing has indicated that resin gel time influences the emissions from composite production. The testing indicated that longer the gel times led to higher emissions. There are a number of factors that influence gel time including initiator type, initiator brand, initiator level, temperature and resin additives. Under actual usage conditions a molder will adjust the initiator to meet a gel time requirement. In this test procedure, the vapor suppressed and non-vapor suppressed resin systems will be adjusted to the same gel time by selecting the appropriate initiator level for each.

11.2.2 All test runs within a test will be processed in a manner that produces the same resin gel time ±2 minutes. To facilitate the resin mixing procedure, master batches of resin and resin plus vapor suppressant of resin are prepared. These resin master batches will have all of the required ingredients except initiator; this includes filler for filled systems. The gel times for the tests are conducted using the master batch and adjustments to meet gel time requirements shall be made to the master batch before emission testing is conducted. Test temperatures must be maintained within the required range, during gel time testing. Further gel time testing is not required after the non-vapor suppressed and vapor suppressed master batches are established with gel times within ±2 minutes. A sufficient quantity of each resin should be prepared to allow for additional test specimens in the event one or more test fails to meet the data acceptance criteria discussed in Section 11.5 and shown in Table 17.2.

11.2.3 The specific brand of initiator and the nominal percentage level recommended by the resin manufacturer will be indicated on the resin certificate of analysis [15] ; or, if a unique gel time is required in a production laminate, initiator brand and percentage will be determined by that specific requirement.

11.2.4 Examples:

11.2.4.1 The resin for a test run is specified as having a 15-minute cup gel time at 77 °F using Brand X initiator at 1.5 percent by weight. The non-suppressed control resin has a 15-minute gel time. The suppressed resin has a gel time of 17-minutes. An initiator level of 1.5 percent would be selected for the both the non-suppressed and the suppressed test samples.

11.2.4.2 Based on a specific production requirement, a resin is processed in production using 2.25 percent of Brand Y initiator, which produces a 20-minute gel time. This initiator at level of 2.25 percent produces a 20 minute gel time for the non-suppressed control resin, but yields a 25-minute gel time for the suppressed resin sample. The suppressed resin is retested at 2.50 percent initiator and produces a 21-minute gel time. The initiator levels of 2.25 percent and 2.50 percent respectively would yield gel times within ±2 minutes.

11.3 Test Run Procedure for Unfilled Resin (see the data sheet shown in Table 17.1).

11.3.1 The insulating board is placed on the balance.

11.3.2 The aluminum pan with attached Mylar film is placed on the balance, and the balance is tared (weight reading set to zero with the plate on the balance.)

11.3.3 Place two plies of 1.5 oz. CSM on the balance and record the weight (glass weight).

11.3.4 The resin beaker and stirring rod are put on the second balance and tared.

11.3.5 The required resin weight and initiator weight are calculated (refer to calculation formulas in 12.2).

11.3.6 The disposable resin application roller is placed on the edge of the plate.

11.3.7 The balance is tared, with the aluminum pan, Mylar film, glass mat, and resin application roller on the balance pan.

11.3.8 Resin is weighed into a beaker, as calculated, using the second balance. The mixing stick should be tared with the beaker weight.

11.3.9 Initiator is weighed into the resin, as calculated, using an eyedropper or a pipette, and the combination is mixed.

11.3.10 Initiated resin is poured on chopped strand mat in a pe-determined pattern (see Figure 11.6).

11.3.11 A stopwatch is started from zero.

11.3.12 The initial laminate weight is recorded.

11.3.13 The plate is removed from balance to enable roll-out of the laminate.

11.3.14 The wet laminate is rolled with the resin application roller to completely distribute the resin, saturate the chopped strand mat, and eliminate air voids. Roll-out time should be in the range of 2 to 3^{16} minutes and vary less than ±10 percent of the average time required for the complete set of six suppressed and six non-suppressed runs.

11.3.15 Record the rollout end time (time from start to completion of rollout).

11.3.16 Place the resin application roller on the edge of the plate when rollout is completed.

11.3.17 Place the plate back on the balance pan. Immediately record the weight.

11.3.18 For the first test in a series of six tests, weight is recorded every 5-minute interval (suppressed and non-suppressed). The end of the test occurs when three consecutive equal weights are recorded or a weight gain is observed (the last weight before the increased weight is the end of test weight). For the remaining five tests in the series, after the initial weights are taken, the next weight is recorded 30 minutes before the end of the test, as suggested by the results from the first test. It is likely that the time to reach the end point of a suppressed resin test will be shorter than the time required to complete a non-suppressed test. Therefore, the time to start taking data manually may be different for suppressed and non-suppressed resins.

11.4 Test Run Procedures for Filled Resin Systems [17] Note that the procedure for filled systems differs from the procedure for unfilled systems. With filled systems, resin is applied to one ply of the CSM and the second ply is placed on top of the resin.

11.4.1 The insulating board is placed on the balance.

11.4.2 The aluminum pan with attached Mylar film is placed on the balance, and the balance is tared (weight reading set to zero with the plate on the balance.)

11.4.3 Place two plies of 1.5 oz. CSM on the balance and record the weight (glass weight).

11.4.4 Remove the top ply of fiberglass and record its weight (weight of 1st layer of glass).

11.4.5 The required resin weight and initiator weight are calculated (refer to calculation formulas in 12.2). Calculate the weight of filled resin and initiator based on the 2 layers of fiberglass.

11.4.6 The resin beaker and stirring rod are put on the second balance and tared.

11.4.7 A disposable resin application roller is placed on the edge of the plate.

11.4.8 The balance is tared, with the aluminum pan, Mylar film, glass mat, and resin application roller on the balance pan.

11.4.9 Resin is weighed into the beaker, as calculated, using the second balance. The mixing stick should be tared with the beaker weight.

11.4.10 Initiator is weighed into the resin, as calculated, using an eyedropper or a pipette, and the combination is mixed.

11.4.11 Initiated resin is poured on the single ply of CSM in a pre-determined pattern. Refer to Figure 11.6.

11.4.12 A stopwatch is started from zero.

11.4.13 Record the weight of the resin ans single ply of CSM (L_1). The initial laminate weight equals L_1 plus the weight of second glass layer.

11.4.14 Replace the second layer of fiberglass.

11.4.15 Remove the plate from the balance to allow roll-out of the laminate.

11.4.16 Roll the wet laminate with the resin application roller to completely distribute the resin, saturate the chopped strand mat, and eliminate air voids. Roll-out time should be in the range of 2 to 3^{16} minutes and vary less than ±10 percent of the average time required for the complete set of six suppressed and six non-suppressed runs.

11.4.17 Record the roll-out end time (time from start to completion of rollout).

11.4.18 Place the resin application roller on the edge of the plate when rollout is completed.

11.4.19 Place the plate back on the balance pan. The initial weight is recorded immediately.

11.4.20 For the first test run in a series of six, weight is recorded at every 5-minute interval (suppressed and non-suppressed). The end of the test occurs when three consecutive equal weights are recorded or a weight gain is observed (the last weight before the increased weight is the end of test weight). For the remaining five tests in the series, after the initial weights are taken, the next weight is recorded 30 minutes before the end of the test, as suggested by the results from the first test. It is likely that the time to reach the end point of a suppressed resin test will be shorter than the time required to complete a non-suppressed test. Therefore, the time to start taking data manually may be different for suppressed and non-suppressed resins.

11.5 Data Acceptance Criteria:

11.5.1 A test set is designed as twelve individual test runs using the same resin, initiator, and gel time, six of the test runs use the resin non-vapor suppressed and the other six use it vapor suppressed.

11.5.2 If a test run falls outside any of the time, temperature, weight or humidity variation requirements, it must be discarded and run again.

11.5.3 The laminate roll out time for each individual test run must vary less than ±10 percent of the average time required for the complete set of six suppressed and six non-suppressed runs.

11.5.4 Test temperature for each test run must be maintained within ±2 °F and the average must be between 70° and 80 °F. Refer to 11.1.3.

11.5.5 The difference in the amount of resin for each run must be within ±10 percent of the average weight for the complete set of six suppressed and six non-suppressed runs.

11.5.6 The relative humidity from each test run must be within ±15 percent of the average humidity for the complete set of six suppressed and six non-suppressed tests. Refer to 11.1.4

11.5.7 The glass content for each test set must be within ±10 percent of the average resin-to-/glass ratio for the complete set of six suppressed and six non-suppressed runs. Refer to 12.2).

11.5.8 The filler content for each test of a test set must be within ±5 percent of the average filler content for the complete set of six suppressed and six non-suppressed runs. Refer to 12.2.

11.6 Resin Application Pour Pattern:

11.6.1 To facilitate the distribution of resin across the chopped strand mat, and to provide consistency from test to test, a uniform pour pattern should be used. A typical pour pattern is shown below:

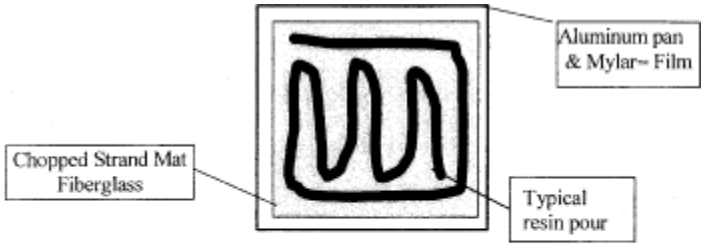


Figure 11.6 Resin Distribution Diagram

11.6.2 The resin is to be evenly distributed across the entire surface of the chopped strand mat using the resin application roller to achieve a wet look across the surface of the laminate. Pushing excess resin off the reinforcement and onto the Mylar sheet should be avoided. No resin is to be pushed more than 1/2 inch beyond the edge of the glass mat. If excess resin is pushed further from the glass mat, it will void the test run. As part of this process, typical visible air voids are to be eliminated by the rollout process. If the pour pattern is different from the above, it must be recorded and attached to test data sheet 17.1.

12. Data Analysis and Calculations

12.1 Data Analysis:

This test method requires a simple mass balance calculation, no special data analysis is necessary.

12.2 Calculations:

12.2.1 The target glass content (percent) for unfilled resin systems is determined from the specific production parameters being evaluated. In absence of any specific production requirements the target may be set at the tester's discretion.

12.2.2 Glass content determination (expressed as a per cent):

% Glass = Glass wt(g)/(Glass wt(g) + Resin weight (g))

12.2.3 Weight of resin required:

Resin weight required = (Glass wt (g)/% glass)—Glass wt (g)

12.2.4 Filled resin formulation determination for filled resin systems (*e.g.* >30 percent filler by weight for a particulate filler, or >1 percent by weight for a lightweight filler, such as hollow microspheres):

% Resin content = resin

weight(g)/(resin weight(g) + glass

weight(g) + filler weight(g))

% Glass content = glass

weight(g)/(resin weight(g) + glass

weight(g) + filler weight(g))

Filler content = filler

weight(g)/(resin weight(g) + glass

weight(g) + filler weight(g))

12.2.5 Initiator weight determination:

Initiator weight (g) = Resin weight(g) × Initiator %

12.2.6 Emission weight loss determination:

Emissions weight loss (g) = Initial resin weight (g)−Final resin weight (g)

12.2.7 % Emission weight loss:

% Emission Weight Loss = (Emission weight loss (g) Initial resin weight (g) × 100

12.2.8 Average % Emission Weight Loss (assuming six test runs):

$$Average\ \%\ \text{Emission Weight Loss} = \sum_{i}^{N=6} \left(\%\ \text{Emission Weight Loss}_{i}\right)/6$$

12.2.9 VSE Factor calculation:

VSE Factor = 1 −(Average % VS Emission Weight Loss/Average NVS Emission Weight Loss)

Table 12.1—Example Calculation

Test #	% VS weight loss	% NVS weight loss
1	6.87	10.86
2	6.76	11.23
3	5.80	12.02
4	5.34	11.70
5	6.11	11.91
6	6.61	10.63
Average Weight Loss	6.25	11.39
VSE Factor		0.4

VSE Factor = 0.45

VSE Factor is used as input into the appropriate equation in Table 1 to this subpart.

Example from Table 1 to this subpart:

Manual Resin Application, 35 percent HAP resin, VSE Factor of 0.45

HAP Emissions with vapor suppresants = ((0.286 × %HAP)−0.0529) × 2000 × (1-(0.5 × VSE factor))

HAP Emissions with vapor suppresants = ((0.286 × .35)−0.0529) × 2000 × (1−(0.5 × .45))

HAP Emissions with vapor suppresants = 73 pounds of HAP emissions per ton of resin.

13. Method Performance

13.1 Bias:

The bias of this test method has not been determined.

13.2 Precision Testing

13.2.1 Subsequent to the initial development of this test protocol by the Composites Fabricators Association, a series of tests were conducted in three different laboratory facilities. The purpose of this round robin testing was to verify the precision of the test method in various laboratories. Each laboratory received a sample of an orthophthalic polyester resin from the same production batch, containing 48 per cent styrene by weight. Each testing site was also provided with the same vapor suppressant additive. The suppressant manufacturer specified the percentage level of suppressant additive. The resin manufacturer specified the type and level of initiator required to produce a 20 minute gel time. The target glass content was 30 percent by weight.

13.2.2 Each laboratory independently conducted the VSE test according to this method. A summary of the results is included in Table 13.1.

Table 13.1—Round Robin Testing Results

	Test Lab 1		**Test Lab 2**		**Test Lab 3**	
	NVS	**VS**	**NVS**	**S**	**NVS**	**VS**
Average percent WT Loss	4.24	1.15	4.69	1.84	5.73	1.61
Standard Deviation	0.095	0.060	0.002	0.002	0.020	0.003
VSE Factor		0.730		0.607		0.720

13.3 Comparison to EPA Reference Methods This test has no corresponding EPA reference method.

14. Pollution Prevention

The sample size used in this method produces a negligible emission of HAP, and has an insignificant impact upon the atmosphere.

15. Waste Management

The spent and waste materials generated during this test are disposed according to required facility procedures, and waste management recommendations on the corresponding material safety data sheets.

16. References and footnotes

16.1 Footnotes:

[1] Balance Enclosure—The purpose of the balance enclosure is to prevent localized airflow from adversely affecting the laboratory balance. The enclosure may be a simple three-sided box with a top and an open face. The configuration of the enclosure is secondary to the purpose of providing a stable and steady balance reading, free from the effects of airflow, for accurate measurements. The enclosure can be fabricated locally. A typical enclosure is shown in Figure 17.1.

[2] Laboratory Balance—Ohaus Precision Standard Series P/N TS400D or equivalent—Paul N. Gardner Co. 316 NE 1st St. Pompano Beach, FL 33060 or other suppliers.

[3] Stop Watch—Local supply.

[4] Thermometer—Mercury thermometer—ASTM No. 21C or equivalent; Digital thermometer—P/N TH-33033 or equivalent—Paul N. Gardner Co. 316 NE 1st St. Pompano Beach, FL 33060 or other suppliers.

[5] Aluminum Pan—Local supply.

[6] Mylar—Local supply.

[7] Double Sided Tape—3M Double Stick Tape or equivalent, local supply.

[8] Laboratory Beakers—250 to 400ml capacity—Local laboratory supply.

[9] Eye Dropper or Pipette—Local laboratory supply.

[10] Disposable Resin Application Roller Source—Wire Handle Roller P/N 205-050-300 or Plastic Handle Roller P/N 215-050-300 or equivalent; ES Manufacturing Inc., 2500 26st Ave. North, St. Petersburg, FL 33713, *www.esmfg.com,* or other source. Refer to Figure 17.3.

[11] Hygrometer or Psychrometer—Model# THWD-1, or equivalent—Part # 975765 by Amprobe Instrument, 630 Merrick Road, P.O. Box 329, Lynbrook, NY 11563, 516-593-5600

[12] Insulating Board (Teflon, cardboard, foam board etc.)—Local supply.

[13] Laboratory Balance With Digital Output—Ohaus Precision Standard Series P/N TS120S or equivalent—Paul N. Gardner Co. 316 NE 1st St. Pompano Beach, FL 33060 or other suppliers.

[14] Chopped Strand Mat—1.5 oz/ft ^{2} Sources: Owens Corning Fiberglas—Fiberglas M-723; PPG Industries—ABM HTX; Vetrotex America—M-127 or equivalent.

[15] Certificate of Analysis: Resin gel time, as recorded on the resin certificate of analysis, is measured using a laboratory standard gel time procedure. This procedure typically uses a 100 gram cup sample at 77 °F (25 °C), a specific type of initiator and a specified percentage.

[16] Roll-out times may vary with resin viscosity or resin additive. The important aspect of this step is to produce the same roll-out time for both the suppressed and non-suppressed samples.

[17] While this test can be used with filled resin systems, the test is not designed to determine the effect of the filler on emissions, but rather to measure the effect of the suppressant additive in the resin system. When evaluating a filled system both the non-vapor suppressed and vapor suppressed samples should be formulated with the same type and level of filler.

16.2 References

1. Phase 1—Baseline Study Hand Lay-up, CFA, 1996

2. CFA Vapor Suppressant Effectiveness Test Development, 4/3/98, correspondence with Dr. Madeleine Strum, EPA, OAQPS

3. CFA Vapor Suppressant Effectiveness Screening Tests, 4/4/98

4. Styrene Suppressant Systems Study, Reichhold Chemical, 11/30/98

5. Evaluation of the CFA's New Proposed Vapor Suppressant Effectiveness Test, Technical Service Request #: ED-01-98, BYK Chemie, 6/3/98

6. Second Evaluation of the CFA's New Proposed Vapor Suppressant Effectiveness Test, Technical Service Request #: ED-02-98, BYK Chemie, 1/26/99

17. Data Sheets and Figures

17.1 This data sheet, or a similar data sheet, is used to record the test data for filled, unfilled, suppressed and non-suppressed tests. If additional time is required, the data sheet may be extended.

Table 17.1 Test Data Sheet

Test Number			Test Type		
			VS (_____)		NVS (_____)
Resin			Filled (_____)		Unfilled (_____)
Initiator				Initiator, %	_____
Vapor Suppressant				VS, %	_____
Weight of 2 layers of glass, g	_____	Weight of 1st glass layer, g	_____	Weight of 2nd glass layer, g	_____
Initial Resin Weight, (g)			Time (Min.)	Weight g	Temp °F
Glass content, (%)			55		
Initial Temperature °F:			60		
Initial Humidity %			65		
Resin Initiator Level, %			70		
Resin gel time, (min.)			75		
Resin filler content, %			80		
Roll out time, (min.)			85		
Time, (min.)	Weight, g	Temp, °F	90		

Initial			95		
			100		
0			105		
5			110		
10			115		
15			120		
20			125		
25			130		
30			135		
35			140		
40			145		
45			150		
50			155		
Final Time, min.	Final Weight, g.		Final Temp, °F	Final Humidity, %	

17.2 Data Acceptance Criteria Worksheet:

The following worksheet is used to determine the quality of collected data (*i.e.* insure the data collected all meets acceptance criteria)

Table 17.2—Data Acceptance Criteria Worksheet

Test No.	Temperature			Laminate roll out time, min	Relative humidity, %		Resin weight, (g)	Glass content, %	Resin distribution	Meets criteria Y/N
	Min	Max	Delta		Initial	Final				
1										
2										
3										
4										
5										
6										
7										
8										
9										
10										
11										
12										
Average										
Criteria	±2 °F	±10% of Average	±15 of Average	±15 of Average	±10% of Avg.	±10% of Avg.	< 1/2 inch off mat	All Y		

17.3 VSE Factor Calculation

Table 17.3—Calculations Worksheet

Vapor suppressed		Non-vapor suppressed	
Test #	**% Weight loss**	**Test #**	**% Weight loss**
Average Weight Loss			
VSE Factor			

VSE Factor = 1—(% Average Weight $Loss_{VS}$/ % Average Weight $Loss_{NVS}$)

17.4 Figures

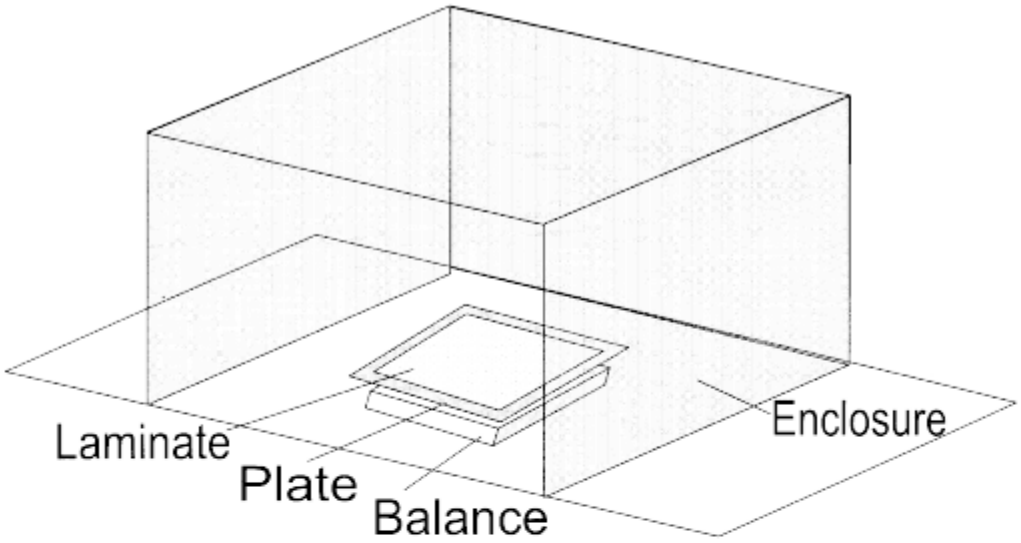


Figure 17.1. Typical Balance Enclosure

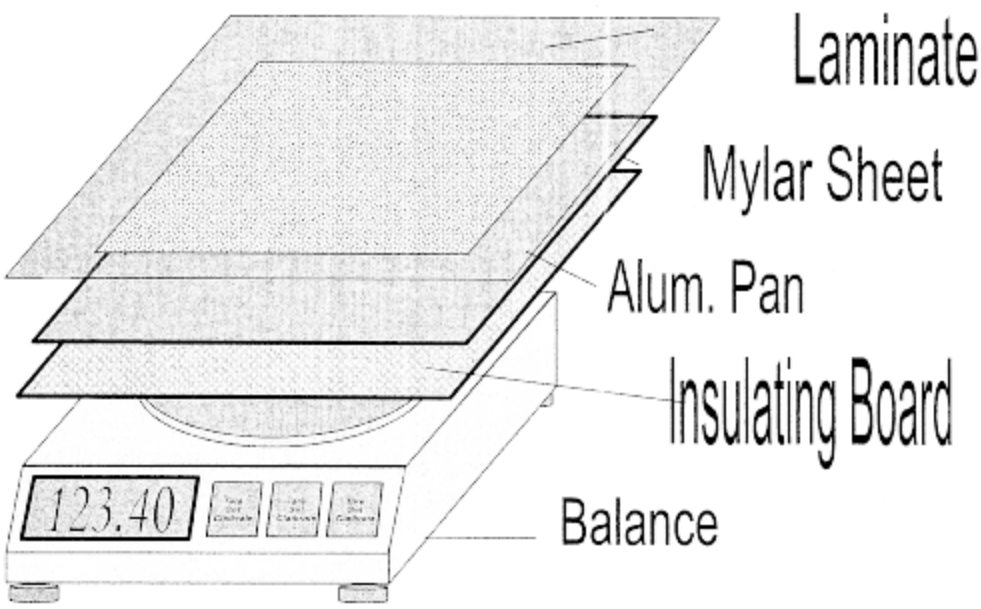
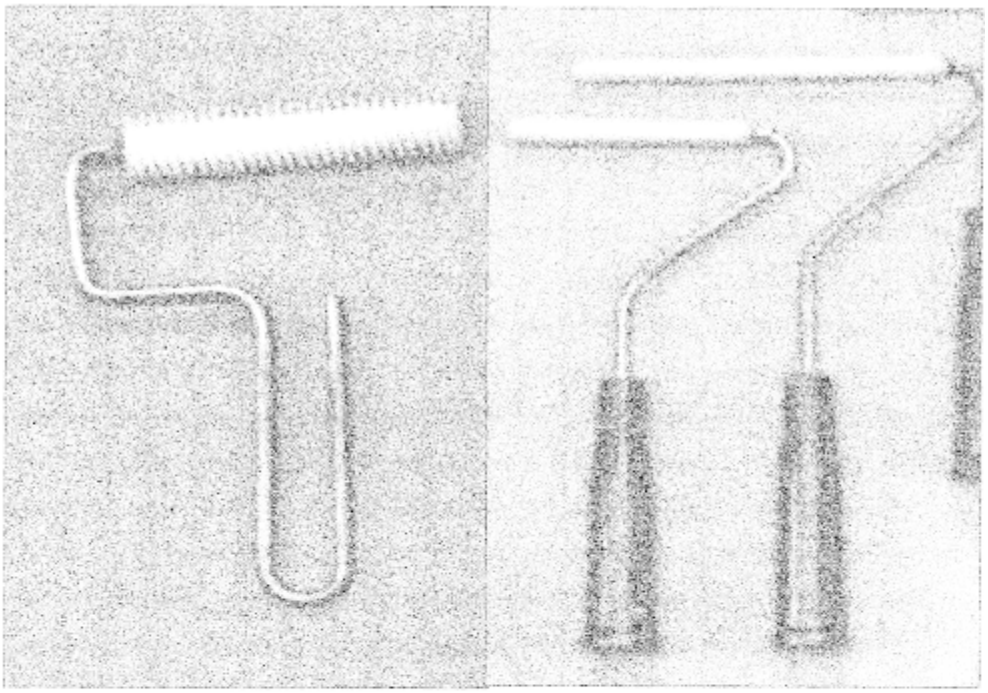


Figure 17.2. Scale, Plate, Insulating Board, Mylar, Laminate Order



FRP Rollers

Figure 17.3. Typical FRP Rollers

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Part 70 Operating Permit Renewal

Source Background and Description

Source Name:	Patrick Industries, Inc. d/b/a Better Way Products
Source Location:	70891 and 71103 County Road 23, New Paris, Indiana 46553
County:	Elkhart
SIC Code:	3089 (Plastics Products, Not Elsewhere Classified)
Permit Renewal No.:	T039-37292-00141
Permit Reviewer:	Jean Fix

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Patrick Industries, Inc. d/b/a Better Way Products relating to the operation of a stationary fiberglass reinforced plastic parts manufacturing source**.** On June 13, 2016, Patrick Industries, Inc. d/b/a Better Way Products submitted an application to the OAQ requesting to renew its operating permit. Patrick Industries, Inc. d/b/a Better Way Products was issued a its second Part 70 Operating Permit Renewal (T039-30758-00141) on March 22, 2012

Source Definition

This Source Definition from the Part 70 Operating Permit Renewal was incorporated into this permit as follows:

This stationary fiberglass reinforced plastic parts manufacturing company consists of four (4) plants:

(a) Plant 1 is located at 70891 County Road 23, New Paris, Indiana 46553;

(b) Plant 2 is located at 70891 County Road 23, New Paris, Indiana 46553;

(c) Plant 3 is located at 70891 County Road 23, New Paris, Indiana 46553; and

(d) Plant 5 is located at 71103 County Road 23, New Paris, Indiana 46553.

IDEM, OAQ has determined that the four plants are one (1) major source, as defined by 326 IAC 2-7-1(22), because these plants are under common ownership and common control, have the same two-digit SIC Code and are located on contiguous properties.

(i) Plants 1 and 3 were initially determined as one source in SPM 039-17829-00141, issued on October 9, 2003.

(ii) Plant 5 was determined as one source in MSM 039-35362-00141, issued on January 28, 2015 and SPM 039-35134-00141, issued on March 31, 2015.

(iii) Plant 2 was determined as one source in the MSM 039-35667-00141, issued on April 29, 2015 and SPM 039-35692-00141, issued on June 26, 2015.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units:

(The descriptions of the booths below have been revised by indicating that there is only one spray applicator in each booth.)

Plant 1:

(a) One (1) gel coat booth, identified as P1-G1, constructed in 1998, with a maximum capacity of 7.5 fiberglass parts per hour and 2.69 gallons of gel coat per part, equipped a with mechanical air-assisted airless spray applicator and dry filters for overspray control, exhausting to Stack S11.

Under NESHAP 40 CFR 63, Subpart WWWW, this facility is considered an existing open molding process and is part of an existing affected reinforced plastic composites production source.

(b) One (1) gel coat booth, identified as P1-G2, constructed in 2003, with a maximum capacity of 7.5 fiberglass parts per hour and 2.69 gallons of gel coat per part, equipped with a mechanical air-assisted airless spray applicator and dry filters for overspray control, exhausting to Stack S12.

Under NESHAP 40 CFR 63, Subpart WWWW, this facility is considered an existing open molding process and is part of an existing affected reinforced plastic composites production source.

(c) One (1) resin booth, identified as P1-R, constructed in 1998, with a maximum capacity of 7.5 fiberglass parts per hour and 7.96 gallons of resin per part, equipped with a mechanical fluid impingement applicator and dry filters for overspray control, exhausting to Stack S13.

Under NESHAP 40 CFR 63, Subpart WWWW, this facility is considered an existing open molding process and is part of an existing affected reinforced plastic composites production source.

(d) One (1) gel coat booth, identified as P1-G3, constructed in 2005, with a maximum capacity of 20 small fiberglass parts per hour and 0.05 gallons of gel coat per part , equipped with a mechanical air-assisted airless spray applicator and dry filters for overspray control, exhausting to Stack S16.

Under NESHAP 40 CFR 63, Subpart WWWW, this facility is considered an existing open molding process and is part of an existing affected reinforced plastic composites production source.

(e) One (1) resin booth, identified as P1-R2, constructed in 2005, with a maximum capacity of 20 small fiberglass parts per hour and 0.40 gallons of resin per part, equipped with a mechanical fluid impingement applicator and dry filters for overspray control, exhausting to Stack S15.

Under NESHAP 40 CFR 63, Subpart WWWW, this facility is considered an existing open molding process and is part of an existing affected reinforced plastic composites production source.

(f) One (1) resin transfer molding (RTM) area, constructed in 2003, utilizing an injection, closed molding process and 30,000 pounds of styrene resins per year, with a maximum

capacity of one (1) fiberglass part per hour and 0.35 gallons of resin per part, uncontrolled, exhausting indoors.

Under NESHAP 40 CFR 63, Subpart WWWW, this facility is considered an existing closed molding process and is part of an existing affected reinforced plastic composites production source.

(g) One (1) final finish area, identified as P1-FF, constructed in 1998, uncontrolled, exhausting indoors, consisting of the following:

(1) Gel coat and resin application with catalyst utilizing manual application methods (hand and hand wiping), with a maximum capacity of 7.5 fiberglass parts per hour, using 0.016 gallons of gel coat per part, and 0.025 gallons of resin per part.

Under NESHAP 40 CFR 63, Subpart WWWW, this facility is considered an existing open molding process and is part of an existing affected reinforced plastic composites production source.

(2) Adhesive and sealant application, utilizing aerosol cans for repairing assembled parts, with a maximum capacity of 7.5 fiberglass parts per hour and 0.00029 gallons of adhesive per part.

(The adhesive and sealant application is not subject to 40 CFR 63, Subpart WWWW. This subset within the final finish area (P1-FF) that had been listed separately has been incorporated with this renewal.)

(h) One (1) assembly operation, identified as P1-AO, constructed in 1998, with a maximum capacity of 7.5 fiberglass parts per hour and 0.003 gallons of adhesive, caulk, and cleaner per part, utilizing manual application methods (hand wiping) and equipped with a HVLP spray applicator, uncontrolled, exhausting indoors.

Under NESHAP 40 CFR 63, Subpart WWWW, this facility is considered an existing open molding process and is part of an existing affected reinforced plastic composites production source.

(i) One (1) grinding booth, identified as P1-GRIND, with one (1) hand grinder, constructed in 1998, with a maximum capacity of 7.5 fiberglass parts or 612 pounds of fiberglass parts per hour, using dry filters for particulate control, exhausting to Stacks S9, S10, and S14.

(j) One (1) grinding booth, identified as P1-SPGRIND, with one (1) hand grinder, constructed in 2007, with a capacity of 160 small fiberglass parts per hour or 108 pounds of fiberglass parts per hour, using dry filters for particulate control, exhausting inside the building.

(k) One (1) resin application booth, identified as P1-R4, constructed in 2015, with a maximum capacity of 7.5 fiberglass parts per hour and 7.96 gallons of resin per part, equipped with two (2) mechanical fluid impingement applicators and dry filters for overspray control, exhausting to Stacks P1-R4S1 and P1-R4S2.

Under NESHAP 40 CFR 63, Subpart WWWW, this facility is considered an existing open molding process and is part of an existing affected reinforced plastic composites production source.

Plant 2:

(a) One (1) gel coat booth, identified as P2-MSGG1, constructed in 2015, with a maximum capacity of 0.25 molds per hour and 1.22 gallons of gel coat per mold, equipped with HVLP gel coat application, using dry filter bank for particulate control, exhausting to Stack MS1-S.

Under NESHAP 40 CFR 63, Subpart WWWW, this facility is considered an existing open molding process and is part of an existing affected reinforced plastic composites production source.

(b) One (1) FIT chop booth, identified as P2-MSCG1, constructed in 2015, with a maximum capacity of 0.25 molds per hour and 9.6 gallons of resin per mold, using dry filter bank for particulate control, exhausting to Stack MS2-S.

Under NESHAP 40 CFR 63, Subpart WWWW, this facility is considered an existing open molding process and is part of an existing affected reinforced plastic composites production source.

(c) One (1) mold shop miscellaneous coating operation, identified as P2-MSMISC, constructed in 2015, with a maximum capacity of 0.25 molds per hour and 0.10 gallons of coating per mold, uncontrolled and exhausting inside the building.

(d) One (1) grinding booth, identified as P2-MSGRIND1, constructed in 2015, with a maximum capacity of 500 pounds of molds per hour, using dry filters for particulate control, exhausting inside the building.

Plant 3:

(a) One (1) resin transfer closed molding unit, identified as RTM1, installed in 2010, with a throughput capacity of five (5) parts per hour and 0.60 gallons of resin per part, utilizing mechanical non-atomized resin application method, uncontrolled, exhausting indoors.

Under NESHAP 40 CFR 63, Subpart WWWW, this facility is considered an existing closed molding process and is part of an existing affected reinforced plastic composites production source.

Plant 5:

(a) One (1) gel coat booth, identified as P5-G, constructed in 1996, with a maximum capacity of 7.5 fiberglass parts per hour and 1.79 gallons of gel coat per part, equipped with a mechanical air-assisted airless spray applicator and dry filters for overspray control, exhausting to Stack S4.

Under NESHAP 40 CFR 63, Subpart WWWW, this facility is considered an existing open molding process and is part of an existing affected reinforced plastic composites production source.

(b) One (1) resin chop area, identified as P5-R, constructed in 1996, with a maximum capacity of 7.5 fiberglass parts per hour and 4.44 gallons of resin per part, equipped with a mechanical fluid impingement applicator and dry filters for overspray control, exhausting to Stacks S7 and S8.

Under NESHAP 40 CFR 63, Subpart WWWW, this facility is considered an existing open molding process and is part of an existing affected reinforced plastic composites production source.

(c) One (1) gel coat/resin chop application area, identified as P5-LTGR, constructed in 2003, with a maximum capacity of 7.5 fiberglass parts per hour, using 0.061 gallons of gel coat per part and 1.05 gallons of resin per part, equipped with a mechanical non-atomized applicator and dry filters for overspray control, exhausting to Stacks S2 and S3.

Under NESHAP 40 CFR 63, Subpart WWWW, this facility is considered an existing open molding process and is part of an existing affected reinforced plastic composites production source.

(d) One (1) final finish area, identified as P5-FF, constructed in 1996, uncontrolled, exhausting indoors, consisting of the following:

(1) Gel coat and resin application with catalyst utilizing manual application methods (hand and hand wiping), with a maximum capacity of 7.5 fiberglass parts per hour, using 0.02 gallons of gel coat per part, and 0.3 gallons of resin per part.

Under NESHAP 40 CFR 63, Subpart WWWW, this facility is considered an existing open molding process and is part of an existing affected reinforced plastic composites production source.

(2) Adhesive and sealant application, utilizing aerosol cans for repairing assembled parts, with a maximum capacity of 7.5 fiberglass parts per hour and 0.0003 gallons adhesive per part.

(The adhesive and sealant application is not subject to 40 CFR 63, Subpart WWWW. This subset within the final finish area (P5-FF) that had been listed separately has been incorporated with this renewal.)

(e) One (1) assembly operation, identified as P5-AO, constructed in 1996, with a maximum capacity of 7.5 fiberglass parts per hour and 0.003 gallons of adhesive, caulk, and cleaner per part, utilizing manual application methods (hand wiping) and equipped with a HVLP spray applicator, uncontrolled, exhausting indoors.

Under NESHAP 40 CFR 63, Subpart WWWW, this facility is considered an existing open molding process and is part of an existing affected reinforced plastic composites production source.

(f) One (1) grinding booth with a maximum of four (4) grinders, identified as P5-GRIND#1, constructed in 2007, with a maximum capacity of 504 pounds of fiberglass parts per hour, equipped with dry filters for particulate control, exhausting to Stack S5.

(g) One (1) grinding booth with a maximum of four (4) grinders, identified as P5-GRIND#2, constructed in 1996, with a maximum capacity of 216 pounds of fiberglass parts per hour, using dry filters for particulate control, exhausting to Stack S6.

Insignificant Activities

The source also consists of the following insignificant activities:

(a) Natural gas-fired combustion sources consisting of:

Plant 1:

(1) One (1) air makeup unit, identified as P1-A1, constructed in 1998, rated at 4.80 million British thermal units per hour, venting indoors.

(2) Eight (8) radiant heaters, identified as P1-R1 through P1-R8, constructed in 1998, each rated at 0.150 million British thermal units per hour, all exhausting to a stack that vents to the atmosphere.

(3) One (1) radiant heater, identified as P1-R9, constructed in 1998, rated at 0.100 million British thermal units per hour, exhausting to a stack that vents to the atmosphere.

(4) Two (2) office heaters, identified as P1-H1 and P1-H2, constructed in 1998, each rated at 0.100 million British thermal units per hour, all exhausting to a stack that vents to the atmosphere.

Plant 2:

(1) One (1) air makeup unit, identified as P2-MSAM1, constructed in 2015, with a maximum heat input rated at 4.80 million British thermal units per hour, venting indoors.

(2) Five (5) radiant heaters, identified as MSRH1- MSRH5, constructed in 2015, each with a maximum heat input rated at 0.150 million British thermal units per hour, all exhausting to a stack that vents to the atmosphere.

Plant 3:

(1) Two (2) radiant heaters, identified as P3-R1 and P3-R2, constructed in 2000, each rated at 0.150 million British thermal units per hour, all exhausting to a stack that vents to the atmosphere.

(2) One (1) radiant heater, identified as P3-R3, constructed in 2000, rated at 0.100 million British thermal units per hour, exhausting to a stack that vents to the atmosphere.

Plant 5:

(1) One (1) Air Makeup unit, identified as P5-A1, constructed in 2015, rated at 4.8 million British thermal units per hour, venting indoors.

(2) Six (6) Radiant heaters, identified as P5-R1 to R6, constructed in 2015, each rated at 0.15 million British thermal units per hour, all exhausting to a stack that vents to the atmosphere.

(b) Combustion source flame safety purging on startup.

(c) Application of oils, greases lubricants or other nonvolatile materials applied as temporary protective coatings.

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

(e) One (1) solvent recycling unit to recover acetone, identified as P1-AR, constructed on May 9, 2005, with a batch capacity of fifty-five (55) gallons. P1-AR is considered to be an insignificant activity pursuant to 326 IAC 2-7-1(21)(K)(viii).

(f) One (1) robotically controlled water jet cutting unit, identified as P5-WJ, constructed on May 9, 2005, located in Plant 5. P5-WJ is considered to be a trivial activity pursuant to 326 IAC 2-7-1(41)(D)(xi).

(g) Plant 1:

(1) One (1) 5,581.45 gallon above ground vertical fixed roof resin storage tank, identified as P1-RT1, constructed on 3/5/1998, and one (1) enclosed, in-line sheer mixing tank, identified as P1-R2SM, constructed on 5/9/2005.

Under NESHAP 40 CFR 63, Subpart WWWW, this facility is considered an existing HAP storage/mixing tank and is part of an existing affected reinforced plastic composites production source.

(h) Plant 2:

(1) Miscellaneous particulate matter operations, identified as P2-MPM, consisting of plywood cutting for mold construction, with a maximum capacity of 32 pounds of plywood per hour, uncontrolled, exhausting indoors.

(The miscellaneous particulate matter operations (P2-MPM) had been removed from SSM 039-34877-00141, issued November 12, 2014 when the plywood cutting operation was temporarily moved from Plant 3 offsite. The source has confirmed this operation is in service to Plant 2.)

(i) Plant 3:

(1) One (1) tooling gel coat and resin operation, consisting of one (1) booth, identified as P3-R/G, constructed in 1996 and 1997, with a total maximum capacity of 0.10 fiberglass parts per hour, using 1.22 gallons of gel coat per part and 13.7 gallons of resin per part, equipped with a high efficiency air-atomized applicator for the gel coat operation and equipped with an airless spray applicator and manual application for resins, using dry filters for control, exhausting to Stack S1.

Under NESHAP 40 CFR 63, Subpart WWWW, this facility is considered an existing open molding process and is part of an existing affected reinforced plastic composites production source.

(j) Plant 5:

(1) One (1) 5,581.45 gallon above ground vertical fixed roof resin storage tank, identified as P5-RT1, constructed in 2015, and two (2) enclosed, in-line sheer mixing tanks, identified as P5-RSM1 and P5-RSM2, constructed in 2015.

Under NESHAP 40 CFR 63, Subpart WWWW, this facility is considered an existing HAP storage/mixing tank and is part of an existing affected reinforced plastic composites production source.

(2) One (1) waste acetone recycling unit, identified as P5-AR, permitted in 2015, with a maximum throughput capacity of 2.29 gallons per hour of waste acetone, which contains methanol, uncontrolled, and exhausting inside the building.

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

Existing Approvals

Since the issuance of the Part 70 Operating Permit T039-30758-00141 on March 22, 2012, the source has constructed or has been operating under the following additional approvals:

(a) Significant Source Modification No. 039-34877-00141, issued on November 12, 2014;

(b) Significant Permit Modification No. 039-34895-00141, issued on December 2, 2014;

(c) Minor Source Modification No. 039-35362-00141, issued on January 28, 2015;

(d) Significant Permit Modification No. 039-35134-00141, issued on March 31, 2015;

(e) Minor Source Modification No. 039-35667-00141, issued on April 29, 2015;

(f) Significant Permit Modification No. 039-35692-00141, issued on June 26, 2015; and

(g) Administrative Amendment No. 039-36217-00141, issued on September 11, 2015.

All terms and conditions of previous permits issued pursuant to permitting programs approved into the State Implementation Plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous registrations and permits are superseded by this permit.

Enforcement Issue

There are no enforcement actions pending.

Emission Calculations

See Appendix A of this document for detailed emission calculations.

County Attainment Status

The source is located in Elkhart 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]Attainment effective October 18, 2000, for the 1-hour ozone standard for the South Bend-Elkhart area, including Elkhart County, and is a maintenance area for the 1-hour National Ambient Air Quality Standards (NAAQS) for purposes of 40 CFR 51, Subpart X*. The 1-hour standard 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. Elkhart 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) $PM_{2.5}$
Elkhart 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
Elkhart 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.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Unrestricted Potential Emissions	
Pollutant	Tons/year
PM	736.43
PM_{10}	736.87
$PM_{2.5}$	736.87
SO_2	0.05
NO_x	7.71
VOC	945.68
CO	6.47
Single HAP	825.62
Total HAP	827.15

HAPs	**tons/year**
Styrene	825.62
Methyl Methacrylate	1.345
Hexane	0.14
Methanol	0.03
Misc HAPs	0.01
Total	**827.15**

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

(a) The potential to emit (as defined in 326 IAC 2-7-1(30)) of PM10, PM2.5 and VOC are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7 and will be issued a Part 70 Operating Permit Renewal.

(b) The potential to emit (as defined in 326 IAC 2-7-1(30)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(30)) of a combination of HAPs is equal to or greater than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(c) 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.

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, because the source met the following:

(a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.

(b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Potential to Emit After Issuance

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

		Potential To Emit of the Entire Source After Issuance of Renewal (tons/year)								
Emission Unit	Unit ID	PM	PM_{10}*	$PM_{2.5}$**	SO_2	NO_x	VOC[3]	CO	Total HAPs	Worst Single HAP
gelcoat booth – Plant 1	P1-G1 [1] [4]	15.07	15.07	15.07	-	-	244.50	-	178.40	178.40
gelcoat booth – Plant 1	P1-G2 [4]	15.07	15.07	15.07	-	-		-	178.40	178.40
gelcoat booth – Plant 1	P1-G3 [2] [4]	0.74	0.74	0.74	-	-		-	8.67	9.99
resin booth - Plant 1	P1-R2 [2]	-	-	-	-	-		-	15.03	
resin booth - Plant 1	P1-R [1]	-	-	-	-	-		-	111.30	111.30
resin application booth - Plant 1	P1-R4 [4]	7.97	7.97	7.97	-	-		-	109.46	109.46
resin transfer molding - Plant 1	RTM	-	-	-	-	-		-	0.14	0.14
assembly operation - Plant 1	P1-AO [4]	0.04	0.04	0.04	-	-		-	0.05	0.00
gelcoat booth – Plant 5	P5-G [4]	9.99	9.99	9.99	-	-		-	118.58	118.58
resin chop area - Plant 5	P5-R	0.00	0.00	0.00	-	-		-	62.07	62.07
gelcoat/resin chop area - Plant 5	P5-LTGR [4]	0.09	0.09	0.09	-	-		-	18.68	18.68
assembly operation - Plant 5	P5-AO [4]	0.04	0.04	0.04	-	-		-	0.05	0.00
insig: tooling gelcoat/resin – Plant 3	P3-R/G [4]	0.09	0.09	0.09	-	-		-	7.49	7.40
final finish area - Plant 1	P1-FF	0.01	0.01	0.01	-	-		-	1.41	1.41
final finish area - Plant 5	P5-FF	0.01	0.01	0.01	-	-		-	1.41	1.41
resin transfer closed molding unit - Plant 3	RTM1	-	-	-	-	-		-	2.29	1.98
mold prep-cleanup - Plant 3	RTM1 Mold Prep	-	-	-	-	-		-	-	-
gelcoat booth – Plant 2	P2-MSGG1	1.86	1.86	1.86	-	-		-	3.38	2.89
FIT chop booth - Plant 2	P2-MSCG1	2.20	2.20	2.20	-	-		-	6.11	5.74
mold shop misc coating - Plant 2	P2-MSMISC	0.00	0.00	0.00	-	-	0.72	-	-	-
insig: misc particulate matter operation	P2-MPM	0.21	0.21	0.21	-	-	-	-	-	-
grinding booth - Plant 1	P1-GRIND [4]	1.66	1.66	1.66	-	-	-	-	-	-
grinding booth - Plant 1	P1-SPGRIND	0.60	0.60	0.60	-	-	-	-	-	-
grinding booth - Plant 5	P5-GRIND#1 [4]	1.14	1.14	1.14	-	-	-	-	-	-
grinding booth - Plant 5	P5-GRIND#2 [4]	0.48	0.48	0.48	-	-	-	-	-	-
grinding booth - Plant 2	P2-MSGRIND1	12.51	12.51	12.51	-	-	-	-	-	-
insig: waster acetone recycle - Plant 5	P5-AR	-	-	-	-	-	0.03	-	0.03	-

Emission Unit	Unit ID	Potential To Emit of the Entire Source After Issuance of Renewal (tons/year)								
		PM	PM_{10}*	$PM_{2.5}$**	SO_2	NO_x	VOC[3]	CO	Total HAPs	Worst Single HAP
Insignificant activities:										
Resin Sheer Mix Tanks - Plant 1 & 5	P1-R2SM, P5-RSM1, P5-RSM2	7.05	7.05	7.05	-	-	4.02	-	4.02	4.02
Resin Storage Tanks - Plant 1 & 5	P1-RT1 & P5-RT1	-	-	-	-	-	0.06	-	0.06	0.06
Natural Gas Combustion - all	Natural Gas Combustion (Plants 1,2,3,5)	0.15	0.59	0.59	0.05	7.71	0.42	6.47	0.15	-
Total PTE of Entire Source		**76.98**	**77.42**	**77.42**	**0.05**	**7.71**	**249.75**	**6.47**	**827.15**	**811.92**
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

negl. = negligible
* Under the Part 70 Permit program (40 CFR 70), PM10 and PM2.5, not particulate matter (PM), are each considered as a regulated air pollutant".
**$PM_{2.5}$ listed is direct $PM_{2.5}$.
(1) 326 IAC 8-1-6 VOC limits less than 228 tpy with maximum styrene content 60% by weight
(2) Single HAP limit less than 10 tpy pursuant to MPM 039-21115-00141, issued 7-20-2005
(3) 326 IAC 2-2 PSD VOC limits less than 244.5 tpy
(4) 326 IAC 2-2 PSD PM, PM10, PM2.5 limits

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

(b) These emissions are based upon Appendix A of this Technical Source Document.

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

Federal Rule Applicability

CAM

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

(1) has a potential to emit before controls equal to or greater than the 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 existing emission unit and specified pollutant subject to CAM:

Emission Unit Description	Pollutant	Control Device Used	Emission Limitation (Y/N)	Uncontrolled PTE (tons/year)	Controlled PTE (tons/year)	Major Source Threshold (tons/year)	CAM Applicable (Y/N)	Large Unit (Y/N)
gelcoat booth - plant 1 P1-G1	PM	dry filter	Y 326 IAC 6-3-2	>100	<100	100	Y	N
	PM_{10}	dry filter	Y 326 IAC 2-2	>100	<100	100	Y	N
	$PM_{2.5}$	dry filter	Y 326 IAC 2-2	>100	<100	100	Y	N
gelcoat booth - plant 1 P1-G2	PM	dry filter	Y 326 IAC 6-3-2	>100	<100	100	Y	N
	PM_{10}	dry filter	Y 326 IAC 2-2	>100	<100	100	Y	N
	$PM_{2.5}$	dry filter	Y 326 IAC 2-2	>100	<100	100	Y	N
gelcoat booth - plant 5 P5-G	PM	dry filter	Y 326 IAC 6-3-2	>100	<100	100	Y	N
	PM_{10}	dry filter	Y 326 IAC 2-2	>100	<100	100	Y	N
	$PM_{2.5}$	dry filter	Y 326 IAC 2-2	>100	<100	100	Y	N
grinding booth - plant 1 P1-GRIND	PM	dry filter	Y 326 IAC 6-3-2	>100	<100	100	Y	N
	PM_{10}	dry filter	Y 326 IAC 2-2	>100	<100	100	Y	N
	$PM_{2.5}$	dry filter	Y 326 IAC 2-2	>100	<100	100	Y	N

(1) Based on this evaluation, the requirements of 40 CFR Part 64, CAM are applicable to the gelcoat booths P1-G1, P1-G2 and P5-G and grinding booth P1-GRIND for PM, PM10, and PM2.5. A CAM plan was incorporated into Part 70 Renwal No. T039-30758-00141, issued March 22, 2012. There have been no changes to CAM applicability with this renewal.

(2) There are no control devices for the gel coat and resin booth VOC and HAPs emissions; therefore, CAM is not applicable to the gel coat and resin booths for VOC and HAPs.

(3) All other emission units at this facility each have uncontrolled PM, PM10, PM 2.5, VOC and HAPs PTE less than the major source threshold for each pollutant and/or are not

equipped with a control device for the respective pollutant. Therefore, they are not subject to CAM.

See Appendix A of this Technical Source Document, page 1, Uncontrolled Potential Emissions for Permit Level Determination.

NSPS

(b) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this source.

(c) The requirements of the New Source Performance Standard for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for which Construction, Reconstruction, or Modification Commenced After July 23, 1984 (40 CFR 60, Subpart Kb) are still not included in the permit for the two (2) 5,581.45 gallon above ground vertical fixed roof volatile organic liquid storage tanks (P1-RT1 and P5-RT1). Each storage tank has a capacity that is less than seventy-five (75) cubic meters.

NESHAP

(d) The requirements of the National Emission Standards for Halogenated Solvent Cleaning (326 IAC 20-6, 40 CFR 63, Subpart T) are still not included in this permit for the insignificant solvent recycling unit (P1-AR) and the waste acetone recycling unit (P5-AR) because the units do not use a solvent containing methylene chloride, perchlorethylene, trichloretylene, 1,1,1-trichlorethane, carbon tetrachloride, chloroform or any combination of these halogenated HAP solvents in a total concentration greater than five percent (5%) by weight as a cleaning or drying agent.

(e) This source is still subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Reinforced Plastic Composites Production (40 CFR 63.5780), Subpart WWWW, which is incorporated by reference as 326 IAC 20-56. This source performs reinforced plastic composites production and is a major source of Hazardous Air Pollutants (HAPs). The fiberglass reinforced plastic component manufacturing operation is an existing affected source because a reinforced plastic composites production affected source existed at this site prior to August 2, 2001. Therefore, the fiberglass reinforced plastic component manufacturing operations and all activities associated with the production of plastic composites are subject to the National Emissions Standards for Hazardous Air Pollutants for Reinforced Plastic Composites Production, 40 CFR 63.5780, Subpart WWWW.

The adhesive and sealant application component of each of the two (2) final finish areas (P1-FF and P5-FF) are specifically excluded from the requirements of this rule. Pursuant to 40 CFR 63.5790(c), the application of mold sealing, adhesives or the repair or production materials that do not contain resin or gel coat are operations specifically excluded from any requirements of this subpart.

The fiberglass reinforced plastic (FRP) composites production operations at this source are subject to the following portions of 40 CFR 63, Subpart WWWW.

(1) 40 CFR 63.5780
(2) 40 CFR 63.5785(a)
(3) 40 CFR 63.5790(a)-(c)
(4) 40 CFR 63.5795(a), (b)
(5) 40 CFR 63.5796
(6) 40 CFR 63.5797
(7) 40 CFR 63.5798
(8) 40 CFR 63.5799(b)
(9) 40 CFR 63.5800

(10) 40 CFR 63.5805(b) and (g)
(11) 40 CFR 63.5810(a)-(d)
(12) 40 CFR 63.5835(a)
(13) 40 CFR 63.5835(c)
(14) 40 CFR 63.5840
(15) 40 CFR 63.5860(a)
(16) 40 CFR 63.5895(c) and (d)
(17) 40 CFR 63.5900(a)(2)-(4)
(18) 40 CFR 63.5900(b) and (c)
(19) 40 CFR 63.5905
(20) 40 CFR 63.5910(a), (b), (c)(1)-(3), (5)
(21) 40 CFR 63.5910(d), (g), (h), and (i)
(22) 40 CFR 63.5915(a)(1), (c), and (d)
(23) 40 CFR 63.5920
(24) 40 CFR 63.5925
(25) 40 CFR 63.5930
(26) 40 CFR 63.5935
(27) Tables 1, 3, 4, 7, 8, 9, 13, and 14 of Subpart WWWW (applicable portions)

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

This NESHAP contains no testing requirements applicable to the source.

This is an existing applicable requirement and no changes in the applicable portions have been made in this renewal.

(f) The requirements of 40 CFR 63, Subpart VVVV - National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Boat Manufacturing is not included in the permit because this source does not manufacture fiberglass boats or aluminum recreational boats.

(g) The requirements of 40 CFR 63, Subpart PPPP - National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Plastic Parts and Products are not included in the permit because, pursuant to 40 CFR 63.4481(c)(6), Subpart PPPP does not apply to gel coat operations used in the manufacture of reinforced plastic composites parts that meet the applicability criteria for reinforced plastic composites production (Subpart WWWW).

(h) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in this permit renewal.

State Rule Applicability - Entire Source

326 IAC 1-6-3 (Preventive Maintenance Plan)
The source is subject to 326 IAC 1-6-3.

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))
(a) VOC
In order to render 326 IAC 2-2 not applicable, the total VOC emissions from the following shall be limited to less than two hundred forty four and five tenths (244.5) tons per twelve (12) consecutive month period with compliance determined at the end of each month:

Plant 1
(i) gel coat booths (P1-G1 and P1-G2)
(ii) resin booth (P1-R)
(iii) gel coat booth (P1-G3)
(iv) resin booth (P1-R2)
(v) resin transfer molding (RTM) area
(vi) final finish area (P1-FF)
(vii) assembly operation (P1-AO)
(viii) resin application booth (P1-R4)

Plant 2:
(i) gel coat booth (P2-MSGG1)
(ii) FIT chop booth (P2-MSCG1)

Plant 3
(i) resin transfer closed molding unit (RTM1)
(ii) tooling gel coat and resin operation (P3-R/G)

Plant 5
(i) gel coat booth (P5-G)
(ii) resin chop area (P5-R)
(iii) gel coat/resin chop application area (P5-LTGR)
(iv) final finish area (P5-FF)
(v) assembly operation (P5-AO)

Compliance with the above limit in conjunction with the unlimited VOC emissions from all other emission units at the source will limit the source-wide VOC emissions less than 250 tons per year and render 326 IAC 2-2 not applicable. Therefore, this is a minor source under 326 IAC 2-2.

This is an existing limit and no changes have been made in this renewal.

(b) PM, PM10, PM2.5
In order to render 326 IAC 2-2 not applicable, the PM, PM10 and PM2.5 emissions after control from the facilities listed in the table below shall not exceed specified limit:

Plant	Emission Unit	PM limit (lbs/hr)	PM10 limit (lbs/hr)	PM2.5 limit (lbs/hr)
Plant 1	gel coat booth (P1-G1)	3.44	3.44	3.44
	gel coat booth (P1-G2)	3.44	3.44	3.44
	gel coat booth (P1-G3)	0.17	0.17	0.17
	assembly operation (P1-AO)	0.01	0.01	0.01
	resin application booth (P1-R4)	1.82	1.82	1.82
Plant 5	gel coat booth (P5-G)	2.28	2.28	2.28
	gel coat/resin chop application area (P5-LTGR)	0.02	0.02	0.02
	assembly operation (P5-AO)	0.01	0.01	0.01
Plant 3	Tooling gel coat/resin operation (P3-R/G)	0.02	0.02	0.02
Plant 1	grinding booth (P1-GRIND)	0.38	0.38	0.38
Plant 5	grinding booth (P5-GRIND#1)	0.26	0.26	0.26
	grinding booth (P5-GRIND#2)	0.11	0.11	0.11

Compliance with the above limits in conjunction with the unlimited particulate emissions from all other emission units at the source will limit the source-wide PM, PM10, and PM2.5 emissions, each, less than 250 tons per year and render 326 IAC 2-2 not applicable. Therefore, this is a minor source under 326 IAC 2-2.

Pursuant to SSM 039-34877 -00141, issued November 12, 2014 and SPM 039-34895-00141, issued December 2, 2014, grinders P1-GRIND and P5-GRIND#2 were added to the 326 IAC 2-2 PSD particulate matter limits and P5-GRIND#1 limits were changed from 5.70 pounds per hour PM and 3.42 pounds per hour PM10 to 0.26 pounds per hour for PM and PM10, each. The change was made in the TSD but was transferred incorrectly to the permit. With this renewal , the PSD limits for grinder P5-GRIND#1 will be updated.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
Pursuant to 326 IAC 2-4.1-1(b)(2), the requirements of 326 IAC 2-4.1-1 do not apply to a major source specifically regulated, or exempt from regulation, by a standard issued pursuant to Section 112(d), 112(h), or 112(j) of the CAA. This source is subject to the requirements of the National Emission Standards for Hazardous Air Pollutants for Reinforced Plastic Composites Production (40 CFR 63, Subpart WWWW). Therefore, pursuant to 326 IAC 2-4.1-1(b)(2), the existing source is exempt from the requirements of 326 IAC 2-4.1.

326 IAC 2-6 (Emission Reporting)
This source, not located in Lake, Porter, or LaPorte County, is subject to 326 IAC 2-6 (Emission Reporting) because it is required to have an operating permit pursuant to 326 IAC 2-7 (Part 70). The potential to emit of VOC and PM10 is less than 250 tons per year; and the potential to emit of CO, NOx, and SO2 is less than 2,500 tons per year. Therefore, pursuant to 326 IAC 2-6-3(a)(2), triennial reporting is required. An emission statement shall be submitted in accordance with the compliance schedule in 326 IAC 2-6-3 by July 1, 2017, and 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 Cerification)
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.

326 IAC 5-1 (Opacity Limitations)
This source is subject to the opacity limitations specified in 326 IAC 5-1-2(1).

326 IAC 6-4 (Fugitive Dust Emissions Limitations)
Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source 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.

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)
The source is not subject to the requirements of 326 IAC 6-5 because it does not contain any facilities with the potential to emit fugitive PM in amounts greater than twenty-five (25) tons per year.

326 IAC 6.5 PM Limitations Except Lake County
This source is not subject to 326 IAC 6.5 because it is not located in one of the following counties: Clark, Dearborn, Dubois, Howard, Marion, St. Joseph, Vanderburgh, Vigo or Wayne.

State Rule Applicability – Individual Facilities

Fiberglass Reinforced Plastic (RFP) Component Manufacturing Operations

326 IAC 2-7-10.5 (Part 70 permits; source modifications)
Pursuant to MSM 039-21091-00141, issued May 9, 2005 and MPM 039-21115-00141, issued on July 20, 2005, the total potential to emit of single HAP from the resin booth, identified as P1-R2 and gel coat booth, identified as P1-G3, shall be limited to less than ten (10) tons, per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with this limit makes the requirements of 326 IAC 2-7-10.5(f) not applicable to Minor Source Modification 039-21091-00141, issued May 9, 2005 and Minor Permit Modification 039-21115-00141, issued July 20, 2005.

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

(a) Pursuant to 326 IAC 6-3-2(d), particulate matter (PM) emissions from the following units shall be controlled by dry particulate filters, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

Plant 1
(i) gel coat booths (P1-G1 and P1-G2)
(ii) gel coat booth (P1-G3)
(iii) resin application booth (P1-R4)

Plant 2:
(i) gel coat booth (P2-MSGG1)

Plant 3
(i) tooling gel coat and resin operation (P3-R/G)

Plant 5
(i) gel coat booth (P5-G)
(ii) gel coat/resin chop application area (P5-LTGR)

(b) The two (2) final finish areas, identified as P1-FF and P5-FF, and the two (2) final assembly operations, identified as P1-AO and P5-AO, apply gel coat and resin with catalyst utilizing manual application methods (hand and hand wiping) that produce no airborne particulate and minimal overspray.

Pursuant to 326 IAC 6-3-1(b)(5) through (8), surface coating using dip, roll, flow, and brush coating are exempt from the requirements of 326 IAC 6-3-2. Therefore, the requirements of 326 IAC 6-3-2 do not apply to these units. They will be removed from the 326-IAC 6-3-2 requirements in the permit.

(c) The resin booths (P1-R, P1-R2) and the resin chop area (R5-R) utilize 100% transfer efficiency application technology and do not produce particulate emissions. Therefore, the requirements of 326 IAC 6-3-2 do not apply to these units. They will be removed from the 326-IAC 6-3-2 requirements in the permit.

(d) Pursuant to 326 IAC 6-3-1(b)(14), the FIT chop booth, identified as P2-MSCG1, is exempt from the requirements of 326 IAC 6-3-2 because its potential emissions are less than 0.551 pounds per hour. This unit will be removed from the 326 IAC 6-3-2 requirements in the permit.

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

(a) P1-G1 and P1-R:
Pursuant to the 326 IAC 8-1-6 BACT determination in CP039-8708-00141, issued on March 5, 1998 and SPM 039-17869-00141, issued on October 9, 2003, the Permittee shall comply with the following:

(1) The Permittee shall utilize an air-assisted airless spray applicator for gel coat and mechanical nonatomized application technology for resin. Air-assisted airless spray technology means a coating application system in which the coating fluid (including gel coat or resin) is supplied to the gun under fluid pressure; and air is combined at the spray cap of the gun.

(2) The combined potential to emit VOC from gelcoat booth, identified as P1-G1, and resin booth, identified as P1-R, shall be limited to less than a total of two hundred twenty eight (228) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

(3) The maximum styrene content of the resins used shall not exceed 60.0 percent by weight.

(b) P1-G2, P5-G, P5-R and P5-LTGR:
Pursuant to the 326 IAC 8-1-6 BACT determination in initial Title V Permit 039-7106-00141, issued December 30, 1999 and SPM 039-17869-00141, issued on October 9, 2003, the Permittee of the two (2) gel coat booths, identified as P1-G2 and P5-G, the resin booth, identified as P5-R, and the gelcoat/resin chop application, identified as P5-LTGR, shall comply with the following:

(1) The total HAP monomer content of the following materials shall be limited based on the application method used and the products produced as specified in the following table:

Fiber Reinforced Plastics Composites Products Except Watercraft	HAP Monomer Content, Weight Percent
Resin, manual or mechanical application	
Production - Specialty products	48
Production - Non-corrosion resistant unfilled	38
Production - Non-corrosion resistant filled	35
Production - Non-corrosion resistant, applied to thermoformed thermoplastic sheet	42
Production - Class I, Flame and Smoke	60
Shrinkage controlled	52
Tooling	43

Gel coat application	
Production - Pigmented	37
Clear production	44
Tooling	45
Production - pigmented, subject to ANSI standards	45
Production - clear, subject to ANSI standards	50

(2) The following categories of materials shall be applied using mechanical nonatomized application technology or manual application:

(A) Production noncorrosion resistant, unfilled resins from all sources.

(B) Production, specialty products resins from all sources.

(C) Tooling resins used in the manufacture of water craft.

(D) Production resin used for Class I flame and smoke products.

(3) Unless specified in subsection (2), gel coat application and mechanical application of resins shall be by any of the following spray technologies:

(A) Nonatomized application technology.

(B) Air-assisted airless.

(C) Airless.

(D) High volume, low pressure.

(E) Equivalent emission reduction technologies to subdivisions (B) through (D).

2003:
Pursuant to SSM 039-17829-00141, issued September 22, 2003, and SPM 039-17869-00141, issued October 9, 2003, unit descriptions were updated and incorporated into the 326 IAC 8-1-6 and 326 IAC 20-25 requirements in the permit. Although the ATSD correctly identified gel coat booth P1-G2 as subject to the requirements of 326 IAC 20-25 as satisfying the requirements of 326 IAC 8-1-6 (BACT), the unit was incorrectly written in the permit as P1-G1. The condition listed Plant 2 units as subject to the same requirements, although they were not individually listed. Plant 2 at that time consisted of P2-G, P2-R and P2-LTGR. Therefore, these units are subject to requirements to satisfy 326 IAC 8-1-6.

2007:
Pursuant to 1st Permit Renewal 039-18584-00141, issued September 5, 2007, no change was made to the regulations set up under 326 IAC 20-25 in order to satisfy 326 IAC 8-1-6 (BACT). However, 326 IAC 20-25 was now repealed, so those conditions no longer cited 326 IAC 20-25 but instead only refer to 326 IAC 8-1-6 (BACT). Gelcoat booth P1-G2 was still listed as P1-G1 and P2-LTGR remained absent from the regulations.

2012:
2nd Permit Renewal 039-30758-00141, issued March 22, 2012 contained no changes to 326 IAC 8-1-6 applicability.

2016:
With this 3rd Permit Renewal, the typographical error for gel coat booth P1-G2 and the gelcoat/resin booth P2-LTGR (now P5-LTGR) will be corrected for the 326 IAC 8-1-6 requirements.

(4) The Permittee shall operate the two (2) gel coat booths, identified as P1-G2, and P5-G, the resin booth, identified as P5-R, and the gelcoat/resin chop application, identified as P5-LTGR, in accordance with the following work practices standards:

(A) Nonatomizing spray equipment shall not be operated at pressures that atomize the material during the application process.

(B) Except for mixing containers as described in subsection (G), HAP containing materials shall be in a closed container when not in use.

(C) Solvent sprayed during cleanup and resin changes shall be directed into solvent collection containers.

(D) Solvent collection conditions shall be kept closed when not in use.

(E) Clean-up rags with solvent shall be closed when not in use.

(F) Closed containers shall be used for the storage of the following:

(i) All production and tooling resins that contain HAPs.

(ii) All production and tooling gel coats that contain HAPs.

(iii) Waste resins and gel coats that contain HAPs.

(iv) Cleaning materials, including waste cleaning materials.

(v) Other materials that contain HAPs

(G) All resin and gel coat mixing containers with a capacity equal to or greater than fifty-five (55) gallons must have a cover with no visible gaps in place at all times when material is being added to or removed from a container, or mixing or pumping equipment is being placed in or removed from a container.

(H) For routine flushing of resin and gel coat application equipment, such as spray guns, flowcoaters, brushes, rollers, and squeegees, owners or operators must use a cleaning solvent that contains no HAPs. However, recycled cleaning solvents that contain less than or equal to five percent (5%) HAP by weight are considered to contain no HAP for the purposes of this subdivision. For removing cured resin or gel coat from application equipment, no organic HAP limit applies.

(5) All new and existing personnel, including contract personnel, who are involved in resin and gel coat spraying and spray-like applications, identified as P1-G2, P5-G, P5-R and P5-LTGR (for example, those applications that could result in excess emissions if performed improperly) shall be trained according to the following schedule:

(A) All personnel hired after March 1, 2001 shall be trained within fifteen (15) days of hiring.

(B) All personnel hired before March 7, 2001 shall be trained or evaluated by a supervisor within thirty (30) days of the start of operation.

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

(D) Personnel who have been trained by another owner or operator subject to 326 IAC 20-25 are exempt from subdivision (A) if written documentation that the employee's training is current is provided to the new employer.

(E) If the result of an evaluation shows that training is needed, such training shall occur within fifteen (15) days of the evaluation.

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

(i) Appropriate application techniques.

(ii) Appropriate equipment cleaning procedures.

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

(c) Resin application booth P1-R4 is subject to 326 IAC 20-56 Training operations. Therefore, pursuant to 326 IAC 8-1-6(3)(C) it is not subject to 326 IAC 8-1-6. This unit was approved for construction on SSM 039-24877-00141, issued November 12, 2014, and SPM 039-34895-00141, issued December 2, 2014.

(d) Gelcoat booths (P1-G3, P2-MSGG1), resin booth (P1-R2), resin transfer molding units and prep (RTM, RTM1, RTM1 Mold Prep), FIT chop booth (P2-MSCG1), mold shop miscellaneous coating (P2-MSMISC), final finish areas (P1-FF, P5-FF) and assembly operations (P1-AO, P5-AO) are exempt from the requirements of 326 IAC 8-1-6 because each unit emit less than 25 tons per year VOC.

These are existing requirements not being modified in this permit renewal.

326 IAC 8-6 (Organic Solvent Emission Limitations)
This rule applies to sources commencing operation after October 7, 1974 and prior to January 1, 1980, located anywhere in the state, with potential solvent VOC emissions of one hundred (100) tons per year or more, and not regulated by any other provision of Article 8. This source was constructed after January 1, 1980 and is regulated by other article 8 rules. Therefore, this rule does not apply to this source.

326 IAC 20-56 (Reinforced Plastic Composites Production)
Pursuant to 320 IAC 20-56-1(a), the fiberglass reinforced plastic parts manufacturing facilities located at this source and associated resin mixing and storage tanks are subject to the requirements of 326 IAC 20-56-2 because this source is a major source of HAPs that uses thermoset resins and/or gel coats that contain styrene.

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

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

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

(2) To ensure training goals listed in 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 paragraph (1) if written documentation that the employee's training is current is provided to the new employer.

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

(1) Appropriate application techniques.

(2) Appropriate equipment cleaning procedures.

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

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

(1) A copy of the current training program.

(2) A list of the following:

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

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

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

Grinding and Trimming Operations

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

(a) Pursuant to 326 IAC 6-3-2(e), the particulate from grinding operations shall be limited by the following:

Emission Unit	Process Weight Rate (tons/hour)	Maximum Allowable Emission Rate (lbs/hour)	Maximum Allowable Emission Rate (tons/yr)
P1-GRIND	0.306	1.85	8.12
P5-GRIND#1	0.252	1.63	7.13
P5-GRIND#2	0.108	0.923	4.04
P2-MSGRIND1	0.25	1.62	7.09

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

Particulate emissions from the grinding areas shall be controlled by a dry particulate filter and the Permittee shall operate the control device in accordance with manufacturer's specifications. The dry particulate filter shall be in operation at all times P1-GRIND, P5-GRIND#1, P5-GRIND#2 and P2-MSGRIND1 are in operation, in order to comply with this limit.

Pursuant to AA 039-24752-00141, issued September 13, 2007, an existing grinder located in grinding booth P1-GRIND was moved to a newly set up grinding booth P1-SPGRIND used to grind small parts. The maximum throughput of 720 pounds per hour for P1-GRIND was split with P1-SPGRIND, with 85% to P1-GRIND (612 lb per hr) and

15% to be utilized by P1-SPGRIND (108 lb per hr). The 326 IAC 6-3-2 particulate limit was adjusted for P1-GRIND as a result of this change.

Pursuant to Second Renewal 039-30758-00141, issued March 22, 2012, the limit for P1-GRIND was incorrectly updated using the original maximum throughput of 720 pounds per hour because the calculation spreadsheet pound per hour capacity for determining 326 IAC 6-3-2 limit was not changed when the capacity changed in 2007. The renewal permit also found P1-SPGRIND not subject to 326 IAC 6-3-2 because its potential emissions are less than 0.551 pounds per hour.

With this current renewal, the 326 IAC 6-3-2 particulate limit determined for the grinding booth P1-GRIND will be corrected based on the corrected maximum throughput.

(b) Pursuant to 326 IAC 6-3-1(b)(14), the grinding operation, identified as P2-MPM, listed under insignificant activities, is exempt from the requirements of 326 IAC 6-3-2 because its potential emissions are less than 0.551 pounds per hour.

(c) Pursuant to 326 IAC 6-3-1(b)(14), the grinding operation, identified as P1-SPGRIND, is exempt from the requirements of 326 IAC 6-3-2 because its potential emissions are less than 0.551 pounds per hour.

Natural Gas-Fired Combustion Units

326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating)
The natural gas-fired combustion units are not subject to the provisions of 326 IAC 6-2 (Emission Limitations for Sources of Indirect Heating) because these units are not boilers or process heaters. They are air make-up units or space heaters.

326 IAC 6-3 (Particulate Emission Limitations from Manufacturing Processes)
The natural gas-fired combustion units are not subject to the provisions of 326 IAC 6-3 (Particulate Emission Limitations from Manufacturing Processes) because the natural gas-fired space heaters and air make-up units are not manufacturing processes.

326 IAC 7-1.1 Sulfur Dioxide Emission Limitations
The natural gas-fired combustion units located at the source are not subject to the provisions of 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations) because the natural gas-fired space heaters and air make-up units do not have the potential to emit greater than twenty-five (25) tons of SO_2 per year.

Insignificant Activities

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
The uncontrolled particulate emissions from the storage tanks (P1-RT1 and P5-RT1) and sheer mixing tanks (P1-R2SM, P5-RSM1 and P5-RSM2), each, is less than 0.551 pounds per hour. Therefore, as pursuant to 326 IAC 6-3-1(b)(14), these tanks are exempt from the requirements of 326 IAC 6-3.

326 IAC 8-9 (Volatile Organic Liquid Storage Vessels)
The two (2) 5,581.45 gallon above ground vertical fixed roof volatile organic liquid storage tanks (P1-RT1 and P5-RT1) are not subject to the provisions of 326 IAC 8-9 (Volatile Organic Liquid Storage Vessels) because the storage vessels are not located in Clark, Floyd, Lake, or Porter County.

326 IAC 8-3 (Organic Solvent Degreasing Operations)
The waste acetone recycling unit (P5-AR) is not a degreasing operation so it is not subject to this rule.

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.

There are no testing requirements applicable to this source.

Verifying compliance with all VOC limits shall be determined with the MSDS's and the methodology specified in the permit.

Ninety five percent (95%) control efficiency has been used in the PTE calculations for the resin, gel coat and 98.5% for the grinding operations. The dry filters can reasonably operate at this efficiency. Therefore, no particulate testing requirements are included in the permit.

The compliance determination requirements applicable to Plant 1, Plant 2, Plant 3, and Plant 5 of this source are as follows:

(a) Monthly usage by weight, monomer content, method of application, and other emission reduction techniques for each gel coat and resin shall be recorded. VOC emissions shall be calculated by multiplying the usage of each gel coat and resin by the emission factor that is appropriate for the monomer content, method of application, and other emission reduction techniques for each gel coat and resin, and summing the emissions for all gel coats and resins. Emission factors shall be obtained from the reference approved by IDEM, OAQ.

(b) Until such time that new emissions information is available by U.S. EPA in its AP-42 document or other U.S. EPA-approved form, emission factors shall be taken from the following reference approved by IDEM, OAQ: "Unified Emission Factors for Open Molding of Composites", October 13, 2009, or its updates, with the exception of the emission factors for controlled spray application. For VOC-emitting operations not addressed by this reference, emission factors shall be taken from U.S. EPA's AP-42 document. For the purposes of these emission calculations, HAP monomer in resins and gel coats that is not styrene or methyl methacrylate shall be considered as styrene on an equivalent weight basis.

(c) Monthly usage by weight and VOC content of each solvent shall be recorded.

(d) 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 resin, gel coat, catalyst, solvent and mold release agent used in the reinforced plastics composites manufacturing operations.

(e) Compliance with the HAP monomer content limitations shall be determined by one of the following:

(1) The manufacturer's certified product data sheet.

(2) The manufacturer's material safety data sheet.

(3) Sampling and analysis, using any of the following test methods, as applicable:

(1) 40 CFR 60, Method 24, Appendix A (July 1, 1998), shall be used to measure the total volatile HAP and volatile organic compound (VOC) content of resins and gel coats. Method 24 may be modified for measuring the volatile HAP content of resins or gel coats to require that the procedure be performed on uncatalyzed resin or gel coat samples.

(2) 40 CFR 63, Method 311, Appendix A (July 1, 1998), shall be used to measure HAP content in resins and gel coats by direct injection into a gas chromatograph.

(4) An alternate method approved by IDEM, OAQ.

These compliance determination requirements are necessary to ensure compliance with 326 IAC 2-2, 326 IAC 2-7-10.5(f), and 326 IAC 8-1-6 BACT.

The compliance determination requirements applicable to the Plant 1 resin booth (P1-R2) and gel coat booth (P1-G3) of this source are as follows:

(a) HAP emissions from resins and gel coats shall be calculated from HAP applied to the applicators, using the following method:

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

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

HAP emission from coatings, dilution coatings and cleaning solvents, where no cross linking reaction occurs in the process, shall be calculated using the following method:

Emissions, lb or ton = M (mass of coatings, dilution coatings or cleaning solvents used, lb or ton) * weight % HAP * 100 % flash off

These compliance determination requirements are necessary to ensure compliance with 326 IAC 2-2 and 326 IAC 2-7-10.5(f).

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

Stack	Emission Unit	Operating Parameters	Range	Frequency
S11*	P1-G1 gelcoat booth - Plant 1	Visible Inspection	verify placement, integrity and particle loading	Daily
		Visible Observation	overspray while one or more booths are operating	Weekly

Stack	Emission Unit	Operating Parameters	Range	Frequency
		Visible Inspection	overspray on rooftops or nearby ground	Monthly
S12*	P1-G2 gelcoat booth - Plant 1	Visible Inspection	verify placement, integrity and particle loading	Daily
		Visible Observation	overspray while one or more booths are operating	Weekly
		Visible Inspection	overspray on rooftops or nearby ground	Monthly
S16	P1-G3 gelcoat booth - Plant 1	Visible Inspection	verify placement, integrity and particle loading	Daily
		Visible Observation	overspray while one or more booths are operating	Weekly
		Visible Inspection	overspray on rooftops or nearby ground	Monthly
P1R4S1, P1-R4S2	P1-R4 resin application booth - Plant 1	Visible Inspection	verify placement, integrity and particle loading	Daily
		Visible Observation	overspray while one or more booths are operating	Weekly
		Visible Inspection	overspray on rooftops or nearby ground	Monthly
S4*	P5-G gelcoat booth - Plant 5	Visible Inspection	verify placement, integrity and particle loading	Daily
		Visible Observation	overspray while one or more booths are operating	Weekly
		Visible Inspection	overspray on rooftops or nearby ground	Monthly
S2, S3	P5-LTGR gelcoat/resin chop area - Plant 5	Visible Inspection	verify placement, integrity and particle loading	Daily
		Visible Observation	overspray while one or more booths are operating	Weekly
		Visible Inspection	overspray on rooftops or nearby ground	Monthly
S1	P3-R/G insig: tooling gelcoat/resin - Plant 3	Visible Inspection	verify placement, integrity and particle loading	Daily
		Visible Observation	overspray while one or more booths are operating	Weekly
		Visible Inspection	overspray on rooftops or nearby ground	Monthly
MS1-S	P2-MSGG1 gelcoat booth - Plant 2	Visible Inspection	verify placement, integrity and particle loading	Daily
		Visible Observation	overspray while one or more booths are operating	Weekly
		Visible Inspection	overspray on rooftops or nearby ground	Monthly
S9, S10, S14*	P1-GRIND grinding booth - Plant 1	Visible Emissions	normal/abnormal emissions by trained employee	Record Daily during daylight operations
S5	P5-GRIND#1 grinding booth - Plant 5	Visible Emissions	normal/abnormal emissions by trained employee	Record Daily during daylight operations
S6	P5-GRIND#2 grinding booth - Plant 5	Visible Emissions	normal/abnormal emissions by trained employee	Record Daily during daylight operations
none	P2-MSGRIND1 grinding booth - Plant 2	Particulate Filter Inspections	all defective filters will be replaced	Quarterly

* monitoring for these units required by CAM (40 CFR 40)

The Plant 3 tooling gel coat and resin operation (P3-R/G) was added to the 326 IAC 6-3-2 particulate emissions requirements, pursuant to AA 039-24752-00141, issued September 13, 2007. However, no compliance monitoring requirements were included in the amended permit. Compliance monitoring is required for all surface coating operations that are subject to 326 IAC 6-3-2. Therefore, compliance monitoring for P3-R/G has been added to this renewal.

The Plant 5 grinding booths (P5-GRIND#1, P5-GRIND#2) were added to the 326 IAC 6-3-2 particulate emissions requirements pursuant to SSM 039-23169-00141, issued January 26, 2007 and SPM 039-23427-00141, issued February 21, 2007. However, no compliance monitoring requirements were included in the amended permit. Compliance monitoring is required for emission units that are subject to an emission limitation to avoid a state or federal applicable requirement. In this case, both grinding booths are subject to 326 IAC 2-2 PSD Minor limits. Therefore, compliance monitoring for P5-GRIND#1 and P5-GRIND#2 has been added to this renewal.

The Plant 2 grinding booth (P2-MSGRIND1) was added to the 326 IAC 6-3-2 particulate emissions requirements pursuant to MSM 039-35667-00141, issued April 29, 2015 and SPM 039-35692-00141, issued June 26, 2015. However, no compliance monitoring requirements were included in the amended permit. This unit has particulate filter control and vents indoors. Quarterly filter inspection is required to ensure the filters are working properly. Therefore, quarterly inspections for P2-MSGRIND1 have been added to this renewal.

These monitoring conditions are necessary because the dry filters for the reinforced plastic composites production processes listed above must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations), 40 CFR 64 (CAM) and 326 IAC 2-7 (Part 70).

Recommendation

The staff recommends to the Commissioner that the Part 70 Operating Permit Renewal be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on June 13, 2016.

Conclusion

The operation of this stationary fiberglass reinforced plastic parts manufacturing source shall be subject to the conditions of the attached Part 70 Operating Permit Renewal No. T039-37292-00141.

IDEM Contact

(a) Questions regarding this proposed permit can be directed to Jean Fix 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) 234-8531 or toll free at 1-800-451-6027 extension 4-8531.

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

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

Emissions Calculations
Source Wide Emissions Summary
Uncontrolled PTE and PSD Determination

Company Name: Patrick Industries, Inc. d/b/a Better Way Products
Address City IN Zip: 70891 and 71103 County Road 23, New Paris, Indiana 46553
TVOP Renewal No: 039-37292-00141
Reviewer: Jean Fix

Uncontrolled Potential Emissions for Permit Level Determination (tons/year)										
Emission Unit Description	**Emission Units**	**PM**	**PM_{10}**	**$PM_{2.5}$**	**SO_2**	**NOx**	**VOC**	**CO**	**Highest Single HAP****	**Combined HAP**
gelcoat booth - Plant 1	P1-G1	150.50	150.50	150.50	-	-	191.82	-	178.40	178.40
gelcoat booth - Plant 1	P1-G2	150.50	150.50	150.50	-	-	191.82	-	178.40	178.40
gelcoat booth - Plant 1	P1-G3	7.31	7.31	7.31	-	-	9.28	-	8.67	8.67
resin booth - Plant 1	P1-R2	-	-	-	-		19.79	-	15.03	15.03
resin booth - Plant 1	P1-R	-	-	-	-	-	146.72	-	111.30	111.30
resin application booth - Plant 1	P1-R4	79.60	79.60	79.60	-	-	110.47	-	109.46	109.46
resin transfer molding - Plant 1	RTM	-	-	-	-	-	0.353	-	0.143	0.143
assembly operation - Plant 1	P1-AO	0.04	0.04	0.04	-	-	0.061	-	0.00	0.045
gelcoat booth - Plant 5	P5-G	100.02	100.02	100.02	-	-	127.40	-	118.58	118.58
resin chop area - Plant 5	P5-R	0.00	0.00	0.00	-	-	81.83	-	62.07	62.07
gelcoat/resin chop area - Plant 5	P5-LTGR	3.80	3.80	3.80	-	-	26.35	-	18.68	18.68
assembly operation - Plant 5	P5-AO	0.04	0.04	0.04	-	-	0.061	-	0.00	0.045
insig:tooling gelcoat/resin - Plant 3	P3-R/G	0.98	0.98	0.98	-	-	9.68	-	7.40	7.49
final finish area - Plant 1	P1-FF	0.007	0.007	0.01	-	-	2.54	-	1.41	1.41
final finish area - Plant 5	P5-FF	0.007	0.007	0.01	-	-	2.54	-	1.41	1.41
resin transfer closed molding unit - Plant 3	RTM1	-	-	-	-	-	2.29	-	1.98	2.29
mold prep-cleanup - Plant 3	RTM1 Mold Prep	-	-	-	-	-	7.91	-	-	-
gelcoat booth - Plant 2	P2-MSGG1	1.86	1.86	1.86	-	-	3.39	-	2.89	3.38
FIT chop booth - Plant 2	P2-MSCG1	2.20	2.20	2.20	-	-	6.13	-	5.74	6.11
mold shop misc coating - Plant 2	P2-MSMISC	0.00	0.00	0.00	-	-	0.72	-	-	-
insig:misc particulate matter operation	P2-MPM	0.21	0.21	0.21	-	-	-	-	-	-
grinding booth - Plant 1	P1-GRIND	109.51	109.51	109.51	-	-	-	-	-	-
grinding booth - Plant 1	P1-SPGRIND	0.60	0.60	0.60	-	-	-	-	-	-
grinding booth - Plant 5	P5-GRIND#1	76.70	76.70	76.70	-	-	-	-	-	-
grinding booth - Plant 5	P5-GRIND#2	32.85	32.85	32.85	-	-	-	-	-	-
grinding booth - Plant 2	P2-MSGRIND1	12.51	12.51	12.51	-	-	-	-	-	-
	P5-AR	-	-	-	-	-	0.03	-	-	0.03
Resin Sheer Mix Tanks - Plant 1 & 5	P1-R2SM, P5-RSM1, P5-RSM2	7.050	7.050	7.050	-	-	4.02	-	4.02	4.02
Resin Storage Tanks - Plant 1 & 5	P1-RT1 & P5-RT1	-	-	-	-	-	0.06	-	0.06	0.06
Natural Gas Combustion - all	Natural Gas Combustion (Plants 1,2,3,5)	0.15	0.59	0.59	0.05	7.71	0.42	6.47	-	0.15
	TOTALS	**736.43**	**736.87**	**736.87**	**0.05**	**7.71**	**945.68**	**6.47**	**825.62**	**827.15**

** Highest single HAP is styrene

Particulate Matter Emission Limit Evaluation (PSD) (tons/year)					326 IAC 2-2 PSD minor limits		
Emission Unit Description	**Emission Units**	***PM**	***PM_{10}**	***$PM_{2.5}$**	***PM (lb/hr)**	***PM_{10} (lb/hr)**	***$PM_{2.5}$ (lb/hr)**
gelcoat booth - Plant 1	P1-G1	15.07	15.07	15.07	3.44	3.44	3.44
gelcoat booth - Plant 1	P1-G2	15.07	15.07	15.07	3.44	3.44	3.44
gelcoat booth - Plant 1	P1-G3	0.74	0.74	0.74	0.17	0.17	0.17
resin booth - Plant 1	P1-R2	-	-	-			
resin booth - Plant 1	P1-R	-	-	-			
resin application booth - Plant 1	P1-R4	7.97	7.97	7.97	1.82	1.82	1.82
resin transfer molding - Plant 1	RTM	-	-	-			
assembly operation - Plant 1	P1-AO	0.04	0.04	0.04	0.01	0.01	0.01
gelcoat booth - Plant 5	P5-G	9.99	9.99	9.99	2.28	2.28	2.28
resin chop area - Plant 5	P5-R	0.00	0.00	0.00			
gelcoat/resin chop area - Plant 5	P5-LTGR	0.09	0.09	0.09	0.02	0.02	0.02
assembly operation - Plant 5	P5-AO	0.04	0.04	0.04	0.01	0.01	0.01
insig:tooling gelcoat/resin - Plant 3	P3-R/G	0.09	0.09	0.09	0.02	0.02	0.02
final finish area - Plant 1	P1-FF	0.01	0.01	0.01			
final finish area - Plant 5	P5-FF	0.01	0.01	0.01			
resin transfer closed molding unit - Plant 3	RTM1	-	-	-			
mold prep-cleanup - Plant 3	RTM1 Mold Prep	-	-	-			
gelcoat booth - Plant 2	P2-MSGG1	1.86	1.860	1.860			
FIT chop booth - Plant 2	P2-MSCG1	2.20	2.203	2.203			
mold shop misc coating - Plant 2	P2-MSMISC	-	-	-			
insig:misc particulate matter operation	P2-MPM	0.21	0.21	0.21			
grinding booth - Plant 1	P1-GRIND	1.66	1.66	1.66	0.38	0.38	0.38
grinding booth - Plant 1	P1-SPGRIND	0.60	0.60	0.60			
grinding booth - Plant 5	P5-GRIND#1	1.14	1.14	1.14	0.26	0.26	0.26
grinding booth - Plant 5	P5-GRIND#2	0.48	0.48	0.48	0.11	0.11	0.11
grinding booth - Plant 2	P2-MSGRIND1	12.51	12.51	12.51			
insig: waster acetone recycle - Plant 5	P5-AR	-	-	-			
Resin Sheer Mix Tanks - Plant 1 & 5	P1-R2SM, P5-RSM1, P5-RSM2	7.05	7.05	7.05			
Resin Storage Tanks - Plant 1 & 5	P1-RT1 & P5-RT1	-	-	-			
Natural Gas Combustion - all	Natural Gas Combustion (Plants 1,2,3,5)	0.15	0.59	0.59			
	TOTALS	**76.98**	**77.42**	**77.42**			

** Highest single HAP is styrene

*326-IAC-2-2 PSD PM. PM10 and PM2.5 limits

Emissions Calculations
Source Wide Emissions Summary
PTE After Issuance

Company Name: Patrick Industries, Inc. d/b/a Better Way Products
Address City IN Zip: 70891 and 71103 County Road 23, New Paris, Indiana 46553
TVOP Renewal No: 039-37292-00141
Reviewer: Jean Fix

Limited Potential Emissions After Issuance of Permit (tons/year)										
Emission Unit Description	**Emission Units**	**PM**	**PM_{10}**	**$PM_{2.5}$**	**SO_2**	**NOx**	**VOC [3]**	**CO**	**Highest Single HAP****	**Combined HAP**
gelcoat booth - Plant 1	P1-G1 [1] [4]	15.07	15.07	15.07	-	-		-	178.40	178.40
gelcoat booth - Plant 1	P1-G2 [4]	15.07	15.07	15.07	-	-		-	178.40	178.40
gelcoat booth - Plant 1	P1-G3 [2] [4]	0.74	0.74	0.74	-	-		-	9.99	8.67
resin booth - Plant 1	P1-R2 [2]	-	-	-	-	-		-		15.03
resin booth - Plant 1	P1-R [1]	-	-	-	-	-		-	111.30	111.30
resin application booth - Plant 1	P1-R4 [4]	7.97	7.97	7.97	-	-		-	109.46	109.46
resin transfer molding - Plant 1	RTM	-	-	-	-	-		-	0.14	0.14
assembly operation - Plant 1	P1-AO [4]	0.04	0.04	0.04	-	-		-	0.00	0.05
gelcoat booth - Plant 5	P5-G [4]	9.99	9.99	9.99	-	-		-	118.58	118.58
resin chop area - Plant 5	P5-R	0.00	0.00	0.00	-	-	244.50	-	62.07	62.07
gelcoat/resin chop area - Plant 5	P5-LTGR [4]	0.09	0.09	0.09	-	-		-	18.68	18.68
assembly operation - Plant 5	P5-AO [4]	0.04	0.04	0.04	-	-		-	0.00	0.05
insig:tooling gelcoat/resin - Plant 3	P3-R/G [4]	0.09	0.09	0.09	-	-		-	7.40	7.49
final finish area - Plant 1	P1-FF	0.01	0.01	0.01	-	-		-	1.41	1.41
final finish area - Plant 5	P5-FF	0.01	0.01	0.01	-	-		-	1.41	1.41
resin transfer closed molding unit - Plant 3	RTM1	-	-	-	-	-		-	1.98	2.29
mold prep-cleanup - Plant 3	RTM1 Mold Prep	-	-	-	-	-		-	-	-
gelcoat booth - Plant 2	P2-MSGG1	1.86	1.86	1.86	-	-		-	2.89	3.38
FIT chop booth - Plant 2	P2-MSCG1	2.20	2.20	2.20	-	-		-	5.74	6.11
mold shop misc coating - Plant 2	P2-MSMISC	-	-	-	-	-	0.72	-	-	-
insig:misc particulate matter operation	P2-MPM	0.21	0.21	0.21	-	-	-	-	-	-
grinding booth - Plant 1	P1-GRIND [4]	1.66	1.66	1.66	-	-	-	-	-	-
grinding booth - Plant 1	P1-SPGRIND	0.60	0.60	0.60	-	-	-	-	-	-
grinding booth - Plant 5	P5-GRIND#1 [4]	1.14	1.14	1.14	-	-	-	-	-	-
grinding booth - Plant 5	P5-GRIND#2 [4]	0.48	0.48	0.48	-	-	-	-	-	-
grinding booth - Plant 2	P2-MSGRIND1	12.51	12.51	12.51	-	-	-	-	-	-
insig: waster acetone recycle - Plant 5	P5-AR	-	-	-	-	-	0.03	-	-	0.03
Resin Sheer Mix Tanks - Plant 1 & 5	P1-R2SM, P5-RSM1, P5-RSM2	7.05	7.05	7.05	-	-	4.02	-	4.02	4.02
Resin Storage Tanks - Plant 1 & 5	P1-RT1 & P5-RT1	-	-	-	-	-	0.06	-	0.06	0.06
Natural Gas Combustion - all	Natural Gas Combustion (Plants 1,2,3,5)	0.15	0.59	0.59	0.05	7.71	0.42	6.47	-	0.15
	TOTALS	**76.98**	**77.42**	**77.42**	**0.05**	**7.71**	**249.75**	**6.47**	**811.92**	**827.15**
Fugitive emissions - paved and unpaved roads		2.26	0.56	0.08	-	-	-	-	-	-

** Highest single HAP is styrene

[1] 326 IAC 8-1-6 VOC limits less than 228 tpy with max styrene content 60% by weight

[2] Single HAP limit less than 10 tpy pursuant to MPM 039-21115-00141, issued 7-20-2005

[3] 326 IAC 2-2 PSD VOC limits less than 244.5 tpy

[4] 326 IAC 2-2 PSD PM, PM10, PM2.5 limits

Emissions Calculations
Potential Source Wide HAP Emissions Summary

Company Name: Patrick Industries, Inc. d/b/a Better Way Products
Address City IN Zip: 70891 and 71103 County Road 23, New Paris, Indiana 46553
TVOP Renewal No: 039-37292-00141
Reviewer: Jean Fix

Emission Unit Description	Emission Units	Dimethylanaline Emissions (ton/yr)	Hexane Emissions (ton/yr)	Methyl Methacrylate Emissions (ton/yr)	Styrene Emissions (ton/yr)	Methanol Emissions (ton/yr)	Total HAP Emissions (ton/yr)
gelcoat booth - Plant 1	P1-G1	0.00	0.00	0.00	178.40	0.00	178.40
gelcoat booth - Plant 1	P1-G2	0.00	0.00	0.00	178.40	0.00	178.40
gelcoat booth - Plant 1	P1-G3	0.00	0.00	0.00	8.67	0.00	8.67
resin booth - Plant 1	P1-R	0.00	0.00	0.00	111.30	0.00	111.30
resin booth - Plant 1	P1-R2	0.00	0.00	0.00	15.03	0.00	15.03
resin transfer molding - Plant 1	RTM	0.00	0.00	0.00	0.14	0.00	0.14
gelcoat booth - Plant 5	P5-G	0.00	0.00	0.00	118.58	0.00	118.58
resin chop area - Plant 5	P5-R	0.00	0.00	0.00	62.07	0.00	62.07
gelcoat/resin chop area - Plant 5	P5-LTGR	0.00	0.00	0.00	18.68	0.00	18.68
insig:tooling gelcoat/resin - Plant 3	P3-R/G	0.00	0.00	0.09	7.40	0.00	7.49
assembly operation - Plant 1	P1-AO	0.005	0.00	0.041	0.00	0.00	0.045
assembly operation - Plant 5	P5-AO	0.005	0.00	0.041	0.00	0.00	0.045
final finish area - Plant 1	P1-FF	0.00	0.0004	0.00	1.41	0.00	1.41
final finish area - Plant 5	P5-FF	0.00	0.0004	0.00	1.41	0.00	1.41
resin transfer closed molding unit - Plant	RTM1	0.00	0.00	0.32	1.98	0.00	2.29
resin application booth - Plant 1	P1-R4	0.00	0.00	0.00	109.46	0.00	109.46
gelcoat booth - Plant 2	P2-MSGG1	0.00	0.00	0.49	2.89	0.00	3.38
FIT chop booth - Plant 2	P2-MSCG1	0.00	0.00	0.37	5.74	0.00	6.11
insig: waster acetone recycle - Plant 5	P5-AR	0.00	0.00	0.00	0.00	0.03	0.03
Natural Gas Combustion - all	Natural Gas Combustion (Plants 1,2,3,5)	0.00	0.14	0.00	0.00	0.00	0.15
Resin Sheer Mix Tanks - Plant 1 & 5	P1-R2SM, P5-RSM1, P5-RSM2	0.00	0.00	0.00	4.02	0.00	4.02
Resin Storage Tanks - Plant 1 & 5	P1-RT1 & P5-RT1	0.00	0.00	0.00	0.06	0.00	0.06
	Total Emissions (TPY) by HAP	**0.01**	**0.14**	**1.34**	**825.62**	**0.03**	**827.15**

Appendix A: Emissions Calculations
VOC and Particulate
From Gel and Resin Coating Operations
Reinforced Plastics and Composites Fiberglass Processes
Emission Unit (P1-G1)

Company Name: Patrick Industries, Inc. d/b/a Better Way Products
Address City IN Zip: 70891 and 71103 County Road 23, New Paris, Indiana 46553
TVOP Renewal No: 039-37292-00141
Reviewer: Jean Fix

Gel Coat Application (P1-G1)

Material (Note 2)	Density (Lb/Gal) (Note 5)	Weight % Styrene Monomer or VOC (Notes 3 & 4)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Ton Processed per hour	40 CFR 63, Subpart WWWW Table 3 Emission Limit (lb/ton)	Potential VOC pounds per hour	Potential Pounds of VOC per day	Potential VOC tons per year	Particulate Potential (ton/yr)	Transfer Efficiency (Note 1)
Other Pigment Gelcoat	10.71	37.00%	2.69	7.50	0.108	377.00	40.73	977.52	178.40	149.06	75.00%

NOTES:
1) This emission unit uses high transfer efficiency air atomized application technology.
2) This emission unit is capable of applying either, "White or Off-white" or "Other Pigmented" Gelcoat as described in 40 CFR 63, Subpart WWWW. Of the two categories, "Other Pigmented" Gelcoat has the higher HAP monomer content and emission limit.
3) The maximum HAP monomer content for the category of "Other Pigmented" Gelcoat is 37.0% by weight styrene. This complies with the previous BACT Determination.
4) Total VOC content equals total HAP content as styrene.
5) Density based upon Valspar Gray Sanding Gelcoat 5779E90254.

Catalyst

Material (Note 2)	Density (Lb/Gal)	Weight % Styrene Monomer or VOC (Note 3)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Ton Processed per hour	Emission Factor (lb/ton)	Potential VOC pounds per hour	Potential Pounds of VOC per day	Potential VOC tons per year	Particulate Potential (ton/yr)	Transfer Efficiency (Note 1)
Methyl Ethyl Ketone Peroxide	8.34	70.00%	0.07	7.50	0.002	2,000.00	3.06	73.56	13.42	1.44	75.00%

NOTES:
1) This emission unit uses high transfer efficiency air atomized application technology.
2) Cadox L-50A.
3) The VOC content is equal to the weight percent of 2,2,4-Trimethyl-1,3-pentanediol diisobutanoate.

Miscellaneous

Material	Density (Lb/Gal)	Weight % Styrene Monomer or VOC	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Ton Processed per hour	Emission Factor (lb/ton)	Potential VOC pounds per hour	Potential Pounds of VOC per day	Potential VOC tons per year	Particulate Potential (ton/yr)	Transfer Efficiency (Note 1)
Acetone	6.61	0.00%	0.05	7.50	0.00124	2,000.00	0.00	0.00	0.00	0.00	100%

NOTES:
1) Manual application method.

Total Potential Emissions	**43.79**	**1051.08**	**191.82**	**150.50**	
Control Efficiency - Dry Filters 95% Efficient			**0.00%**	**95.00%**	
Controlled Total Potential Emissions			**191.82**	**7.52**	

METHODOLOGY
Tons Processed per Hour (tons/hr) = Material Density (lb/gal) * Usage (gal/unit) * Maximum (units/hr) * 1/2,000 (lb/ton)
Potential VOC Pounds per Hour (lb/hr) = Tons Processed per Hour (tons/hr) * Emission Factor or Limit (lb/ton)
Potential VOC Pounds per Day (lb/day) = Pounds of VOC per Hour (lb/hr) * (24 hr/day)
Potential VOC Tons per Year (tons/yr) = Pounds of VOC per Hour (lb/hr) * 8,760 (hr/yr) * 1/2,000 (lbs/ton)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *8,760 (hrs/yr) * 1/2,000 (lbs/ton)

NOTES
Emission factors are based on the allowable emission limits of 40 CFR 63, Subpart WWWW, Table 3.
Potenitial VOC Emissions from "Other Pigmented" Gelcoat Application = Potential HAP Emissions as Styrene.

Appendix A: Emissions Calculations
VOC and Particulate
From Gel and Resin Coating Operations
Reinforced Plastics and Composites Fiberglass Processes
Emission Unit (P1-G2)

Company Name: Patrick Industries, Inc. d/b/a Better Way Products
Address City IN Zip: 70891 and 71103 County Road 23, New Paris, Indiana 46553
TVOP Renewal No: 039-37292-00141
Reviewer: Jean Fix

Gel Coat Application (P1-G2)

Material (Note 2)	Density (Lb/Gal) (Note 5)	Weight % Styrene Monomer or VOC (Notes 3 & 4)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Ton Processed per hour	40 CFR 63, Subpart WWWW Table 3 Emission Limit (lb/ton)	Potential VOC pounds per hour	Potential Pounds of VOC per day	Potential VOC tons per year	Particulate Potential (ton/yr)	Transfer Efficiency (Note 1)
Other Pigment Gelcoat	10.71	37.00%	2.69	7.50	0.108	377.00	40.73	977.52	178.40	149.06	75.00%

NOTES:
1) This emission unit uses high transfer efficiency air atomized application technology.
2) This emission unit is capable of applying either, "White or Off-white" or "Other Pigmented" Gelcoat as described in 40 CFR 63, Subpart WWWW. Of the two categories, "Other Pigmented" Gelcoat has the higher HAP monomer content and emission limit.
3) The maximum HAP monomer content for the category of "Other Pigmented" Gelcoat is 37.0% by weight styrene.
4) Total VOC content equals total HAP content as styrene.
5) Density based upon Valspar Gray Sanding Gelcoat 5779E90254.

Catalyst

Material (Note 2)	Density (Lb/Gal)	Weight % Styrene Monomer or VOC (Note 3)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Ton Processed per hour	Emission Factor (lb/ton)	Potential VOC pounds per hour	Potential Pounds of VOC per day	Potential VOC tons per year	Particulate Potential (ton/yr)	Transfer Efficiency (Note 1)
Methyl Ethyl Ketone Peroxide	8.34	70.00%	0.07	7.50	0.002	2,000.00	3.06	73.56	13.42	1.44	75.00%

NOTES:
1) This emission unit uses high transfer efficiency air atomized application technology.
2) Cadox L-50A.
3) The VOC content is equal to the weight percent of 2,2,4-Trimethyl-1,3-pentanediol diisobutanoate.

Miscellaneous

Material	Density (Lb/Gal)	Weight % Styrene Monomer or VOC	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Ton Processed per hour	Emission Factor (lb/ton)	Potential VOC pounds per hour	Potential Pounds of VOC per day	Potential VOC tons per year	Particulate Potential (ton/yr)	Transfer Efficiency (Note 1)
Acetone	6.61	0.00%	0.05	7.50	0.00124	2,000.00	0.00	0.00	0.00	0.00	100%

NOTES:
1) Manual application method.

Total Potential Emissions	**43.79**	**1051.08**	**191.82**	**150.50**	
Control Efficiency - Dry Filters 95% Efficient			**0.00%**	**95.00%**	
Controlled Total Potential Emissions			**191.82**	**7.52**	

METHODOLOGY
Tons Processed per Hour (tons/hr) = Material Density (lb/gal) * Usage (gal/unit) * Maximum (units/hr) * 1/2,000 (lb/ton)
Potential VOC Pounds per Hour (lb/hr) = Tons Processed per Hour (tons/hr) * Emission Factor or Limit (lb/ton)
Potential VOC Pounds per Day (lb/day) = Pounds of VOC per Hour (lb/hr) * (24 hr/day)
Potential VOC Tons per Year (tons/yr) = Pounds of VOC per Hour (lb/hr) * 8,760 (hr/yr) * 1/2,000 (lbs/ton)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *8,760 (hrs/yr) * 1/2,000 (lbs/ton)

NOTES
Emission factors are based on the allowable emission limits of 40 CFR 63, Subpart WWWW, Table 3.
Potenitial VOC Emissions from "Other Pigmented" Gelcoat Application = Potential HAP Emissions as Styrene.

Appendix A: Emissions Calculations
VOC and Particulate
From Gel and Resin Coating Operations
Reinforced Plastics and Composites Fiberglass Processes
Emission Unit (P1-G3)

Company Name: Patrick Industries, Inc. d/b/a Better Way Products
Address City IN Zip: 70891 and 71103 County Road 23, New Paris, Indiana 46553
TVOP Renewal No: 039-37292-00141
Reviewer: Jean Fix

Gel Coat Application (P1-G3)

Material (Note 2)	Density (Lb/Gal) (Note 5)	Weight % Styrene Monomer or VOC (Notes 3 & 4)	Gal of Mat. (gal/unit)	Maximum (unit/hour) (Note 6)	Ton Processed per hour	40 CFR 63, Subpart WWWW Table 3 Emission Limit (lb/ton)	Potential VOC pounds per hour	Potential Pounds of VOC per day	Potential VOC tons per year	Particulate Potential (ton/yr)	Transfer Efficiency (Note 1)
Other Pigment Gelcoat	10.71	37.00%	0.049	20.00	0.005	377.00	1.98	47.48	8.67	7.24	75.00%

NOTES:
1) This emission unit uses high transfer efficiency air atomized application technology.
2) This emission unit is capable of applying either, "White or Off-white" or "Other Pigmented" Gelcoat as described in 40 CFR 63, Subpart WWWW. Of the two categories, "Other Pigmented" Gelcoat has the higher HAP monomer content and emission limit.
3) The maximum HAP monomer content for the category of "Other Pigmented" Gelcoat is 37.0% by weight styrene. This complies with the previous BACT Determination.
4) Total VOC content equals total HAP content as styrene.
5) Density based upon Valspar Gray Sanding Gelcoat 5779E90254.
6) Max units/hour = 160 units/day * (1 day/8 hr) (based on 8 hour day)

Catalyst

Material (Note 2)	Density (Lb/Gal)	Weight % Styrene Monomer or VOC (Note 3)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Ton Processed per hour	Emission Factor (lb/ton)	Potential VOC pounds per hour	Potential Pounds of VOC per day	Potential VOC tons per year	Particulate Potential (ton/yr)	Transfer Efficiency (Note 1)
Methyl Ethyl Ketone Peroxide	8.34	70.00%	0.0012	20.00	0.0001	2,000.00	0.140	3.36	0.61	0.07	75.00%

NOTES:
1) This emission unit uses high transfer efficiency air atomized application technology.
2) Cadox L-50A.
3) The VOC content is equal to the weight percent of 2,2,4-Trimethyl-1,3-pentanediol diisobutanoate.

Miscellaneous

Material	Density (Lb/Gal)	Weight % Styrene Monomer or VOC	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Ton Processed per hour	Emission Factor (lb/ton)	Potential VOC pounds per hour	Potential Pounds of VOC per day	Potential VOC tons per year	Particulate Potential (ton/yr)	Transfer Efficiency (Note 1)
Acetone	6.61	0.00%	0.010	20.00	0.00066	2,000.00	0.00	0.00	0.00	0.00	100%

NOTES:
1) Manual application method.

Total Potential Emissions	**2.12**	**50.85**	**9.28**	**7.31**	
Control Efficiency - Dry Filters 95% Efficient			**0.00%**	**95.00%**	
Controlled Total Potential Emissions			**9.28**	**0.365**	

METHODOLOGY
Tons Processed per Hour (tons/hr) = Material Density (lb/gal) * Usage (gal/unit) * Maximum (units/hr) * 1/2,000 (lb/ton)
Potential VOC Pounds per Hour (lb/hr) = Tons Processed per Hour (tons/hr) * Emission Factor or Limit (lb/ton)
Potential VOC Pounds per Day (lb/day) = Pounds of VOC per Hour (lb/hr) * (24 hr/day)
Potential VOC Tons per Year (tons/yr) = Pounds of VOC per Hour (lb/hr) * 8,760 (hr/yr) * 1/2,000 (lbs/ton)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *8,760 (hrs/yr) * 1/2,000 (lbs/ton)

NOTES
Emission factors are based on the allowable emission limits of 40 CFR 63, Subpart WWWW, Table 3.
Potenitial VOC Emissions from "Other Pigmented" Gelcoat Application = Potential HAP Emissions as Styrene.

Appendix A: Emissions Calculations
VOC and Particulate
From Gel and Resin Coating Operations
Reinforced Plastics and Composites Fiberglass Processes
Emission Unit (P1-R)

Company Name: Patrick Industries, Inc. d/b/a Better Way Products
Address City IN Zip: 70891 and 71103 County Road 23, New Paris, Indiana 46553
TVOP Renewal No: 039-37292-00141
Reviewer: Jean Fix

Resin Application (P1-R)

Material (Note 2)	Density (Lb/Gal) (Note 5)	Weight % Styrene Monomer or VOC (Notes 3 & 4)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Ton Processed per hour	40 CFR 63, Subpart WWWW Table 3 Emission Limit (lb/ton)	Potential VOC pounds per hour	Potential Pounds of VOC per day	Potential VOC tons per year	Particulate Potential (ton/yr)	Transfer Efficiency (Note 1)
Non-CR/HS Production Resin	9.67	38.00%	7.963	7.50	0.289	88.00	25.41	609.86	111.30	0.00	100.00%

NOTES:
1) This emission unit uses non-atomized, high transfer efficiency application technology.
2) This emission unit uses non-corrosion resistant/non-high strength resin as defined in 40 CFR 63, Subpart WWWW.
3) The VOC content is equal to the highest allowable styrene content for the application method that would comply with the emission limit of 40 CFR 63, Subpart WWWW for neat Non-CR/HS Resin.
4) Total VOC content equals total HAP content as styrene.
5) Density based upon Resin COR61-AA-257.

Catalyst

Material (Note 2)	Density (Lb/Gal)	Weight % Styrene Monomer or VOC (Note 3)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Ton Processed per hour	Emission Factor (lb/ton)	Potential VOC pounds per hour	Potential Pounds of VOC per day	Potential VOC tons per year	Particulate Potential (ton/yr)	Transfer Efficiency (Note 1)
Methyl Ethyl Ketone Peroxide	8.34	70.00%	0.1847	7.50	0.0058	2,000.00	8.087	194.09	35.42	0.00	100.00%

NOTES:
1) This emission unit uses non-atomized application technology for resin application.
2) Cadox L-50A.
3) The VOC content is equal to the weight percent of 2,2,4-Trimethyl-1,3-pentanediol diisobutanoate.

Miscellaneous

Material	Density (Lb/Gal)	Weight % Styrene Monomer or VOC	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Ton Processed per hour	Emission Factor (lb/ton)	Potential VOC pounds per hour	Potential Pounds of VOC per day	Potential VOC tons per year	Particulate Potential (ton/yr)	Transfer Efficiency (Note 1)
Acetone	6.61	0.00%	0.100	7.50	0.00248	2,000.00	0.00	0.00	0.00	0.00	100%

NOTES:
1) Manual application method.

Total Potential Emissions	**33.50**	**803.95**	**146.72**	**0.00**	
Control Efficiency - Dry Filters 95% Efficient			**0.00%**	**95.00%**	
Controlled Total Potential Emissions			**146.72**	**0.0000**	

METHODOLOGY
Tons Processed per Hour (tons/hr) = Material Density (lb/gal) * Usage (gal/unit) * Maximum (units/hr) * 1/2,000 (lb/ton)
Potential VOC Pounds per Hour (lb/hr) = Tons Processed per Hour (tons/hr) * Emission Factor or Limit (lb/ton)
Potential VOC Pounds per Day (lb/day) = Pounds of VOC per Hour (lb/hr) * (24 hr/day)
Potential VOC Tons per Year (tons/yr) = Pounds of VOC per Hour (lb/hr) * 8,760 (hr/yr) * 1/2,000 (lbs/ton)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *8,760 (hrs/yr) * 1/2,000 (lbs/ton)

NOTES
Emission factors are based on the allowable emission limits of 40 CFR 63, Subpart WWWW, Table 3.
Potenitial VOC Emissions from "Non-CR/HS Production" Resin Application = Potential HAP Emissions as Styrene.

Appendix A: Emissions Calculations
VOC and Particulate
From Gel and Resin Coating Operations
Reinforced Plastics and Composites Fiberglass Processes
Emission Unit (P1-R2)

Company Name: Patrick Industries, Inc. d/b/a Better Way Products
Address City IN Zip: 70891 and 71103 County Road 23, New Paris, Indiana 46553
TVOP Renewal No: 039-37292-00141
Reviewer: Jean Fix

Resin Application (P1-R2)

Material (Note 2)	Density (Lb/Gal) (Note 5)	Weight % Styrene Monomer or VOC (Notes 3 & 4)	Gal of Mat. (gal/unit)	Maximum (unit/hour) (Note 6)	Ton Processed per hour	40 CFR 63, Subpart WWWW Table 3 Emission Limit (lb/ton)	Potential VOC pounds per hour	Potential Pounds of VOC per day	Potential VOC tons per year	Particulate Potential (ton/yr)	Transfer Efficiency (Note 1)
Non-CR/HS Production Resin	9.67	38.00%	0.4033	20.00	0.039	88.00	3.43	82.37	15.03	0.00	100.00%

NOTES:
1) This emission unit uses non-atomized, high transfer efficiency application technology.
2) This emission unit uses non-corrosion resistant/non-high strength resin as defined in 40 CFR 63, Subpart WWWW.
3) The VOC content is equal to the highest allowable styrene content for the application method that would comply with the emission limit of 40 CFR 63, Subpart WWWW for neat Non-CR/HS Resin and the previous BACT Determination.
4) Total VOC content equals total HAP content as styrene.
5) Density based upon Resin COR61-AA-257.
6) Max units/hour = 160 units/day * (1 day/8 hr) (based on 8 hour day)

Catalyst

Material (Note 2)	Density (Lb/Gal)	Weight % Styrene Monomer or VOC (Note 3)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Ton Processed per hour	Emission Factor (lb/ton)	Potential VOC pounds per hour	Potential Pounds of VOC per day	Potential VOC tons per year	Particulate Potential (ton/yr)	Transfer Efficiency (Note 1)
Methyl Ethyl Ketone Peroxide	8.34	70.00%	0.0093	20.00	0.0008	2,000.00	1.086	26.06	4.76	0.00	100.00%

NOTES:
1) This emission unit uses non-atomized application technology for resin application.
2) Cadox L-50A.
3) The VOC content is equal to the weight percent of 2,2,4-Trimethyl-1,3-pentanediol diisobutanoate.

Miscellaneous

Material	Density (Lb/Gal)	Weight % Styrene Monomer or VOC	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Ton Processed per hour	Emission Factor (lb/ton)	Potential VOC pounds per hour	Potential Pounds of VOC per day	Potential VOC tons per year	Particulate Potential (ton/yr)	Transfer Efficiency (Note 1)
Acetone	6.61	0.00%	0.040	20.00	0.00264	2,000.00	0.00	0.00	0.00	0.00	100%

NOTES:
1) Manual application method.

Total Potential Emissions	**4.52**	**108.43**	**19.79**	**0.00**	
Control Efficiency - Dry Filters 95% Efficient			**0.00%**	**95.00%**	
Controlled Total Potential Emissions			**19.8**	**0.000**	

METHODOLOGY
Tons Processed per Hour (tons/hr) = Material Density (lb/gal) * Usage (gal/unit) * Maximum (units/hr) * 1/2,000 (lb/ton)
Potential VOC Pounds per Hour (lb/hr) = Tons Processed per Hour (tons/hr) * Emission Factor or Limit (lb/ton)
Potential VOC Pounds per Day (lb/day) = Pounds of VOC per Hour (lb/hr) * (24 hr/day)
Potential VOC Tons per Year (tons/yr) = Pounds of VOC per Hour (lb/hr) * 8,760 (hr/yr) * 1/2,000 (lbs/ton)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *8,760 (hrs/yr) * 1/2,000 (lbs/ton)

NOTES
Emission factors are based on the allowable emission limits of 40 CFR 63, Subpart WWWW, Table 3.
Potenitial VOC Emissions from "Non-CR/HS Production" Resin Application = Potential HAP Emissions as Styrene.

Appendix A: Emissions Calculations
VOC and Particulate
From Gel and Resin Coating Operations
Reinforced Plastics and Composites Fiberglass Processes
Emission Unit (P1-R4)

Company Name: Patrick Industries, Inc. d/b/a Better Way Products
Address City IN Zip: 70891 and 71103 County Road 23, New Paris, Indiana 46553
TVOP Renewal No: 039-37292-00141
Reviewer: Jean Fix

Resin Application (P1-R4)

Material (Note 2)	Density (Lb/Gal) (Note 5)	Weight % Styrene Monomer or VOC (Notes 3 & 4)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Ton Processed per hour	40 CFR 63, Subpart WWWW Table 3 Emission Limit (lb/ton)	Potential VOC pounds per hour	Potential Pounds of VOC per day	Potential VOC tons per year	Particulate Potential (ton/yr)	Transfer Efficiency (Note 1)
Non-CR/HS Production Resin	9.51	38.00%	7.9630	7.50	0.284	88.00	24.99	599.77	109.46	77.12	95.00%

NOTES:
1) This emission unit uses non-atomized, high transfer efficiency application technology.
2) This emission unit uses non-corrosion resistant/non-high strength resin as defined in 40 CFR 63, Subpart WWWW.
3) The VOC content is equal to the highest allowable styrene content for the application method that would comply with the emission limit of 40 CFR 63, Subpart WWWW for neat Non-CR/HS Resin and the previous BACT Determination.
4) Total VOC content equals total HAP content as styrene.
5) Density based upon Resin COR61-AA-257.

Catalyst

Material (Note 2)	Density (Lb/Gal)	Weight % Styrene Monomer or VOC (Note 3)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Ton Processed per hour	Emission Factor (lb/ton)	Potential VOC pounds per hour	Potential Pounds of VOC per day	Potential VOC tons per year	Particulate Potential (ton/yr)	Transfer Efficiency (Note 1)
Methyl Ethyl Ketone Peroxide	8.34	2.00%	0.1847	7.50	0.0058	2,000.00	0.231	5.55	1.01	2.48	95.00%

NOTES:
1) This emission unit uses non-atomized application technology for resin application.
2) Cadox L-50A.
3) The VOC content is equal to the weight percent of 2,2,4-Trimethyl-1,3-pentanediol diisobutanoate.

Miscellaneous

Material	Density (Lb/Gal)	Weight % Styrene Monomer or VOC	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Ton Processed per hour	Emission Factor (lb/ton)	Potential VOC pounds per hour	Potential Pounds of VOC per day	Potential VOC tons per year	Particulate Potential (ton/yr)	Transfer Efficiency (Note 1)
Acetone	6.61	0.00%	0.100	7.50	0.00248	2,000.00	0.00	0.00	0.00	0.00	100%

NOTES:
1) Manual application method.

Total Potential Emissions	**25.22**	**605.31**	**110.47**	**79.60**	
Control Efficiency - Dry Filters 95% Efficient			**0.00%**	**95.00%**	
Controlled Total Potential Emissions			**110.5**	**3.980**	

METHODOLOGY
Tons Processed per Hour (tons/hr) = Material Density (lb/gal) * Usage (gal/unit) * Maximum (units/hr) * 1/2,000 (lb/ton)
Potential VOC Pounds per Hour (lb/hr) = Tons Processed per Hour (tons/hr) * Emission Factor or Limit (lb/ton)
Potential VOC Pounds per Day (lb/day) = Pounds of VOC per Hour (lb/hr) * (24 hr/day)
Potential VOC Tons per Year (tons/yr) = Pounds of VOC per Hour (lb/hr) * 8,760 (hr/yr) * 1/2,000 (lbs/ton)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *8,760 (hrs/yr) * 1/2,000 (lbs/ton)

NOTES
Emission factors are based on the allowable emission limits of 40 CFR 63, Subpart WWWW, Table 3.
Potenitial VOC Emissions from "Non-CR/HS Production" Resin Application = Potential HAP Emissions as Styrene.

Appendix A: Emissions Calculations
VOC and Particulate
From Gel and Resin Coating Operations
Reinforced Plastics and Composites Fiberglass Processes
Emission Unit (RTM)

Company Name: Patrick Industries, Inc. d/b/a Better Way Products
Address City IN Zip: 70891 and 71103 County Road 23, New Paris, Indiana 46553
TVOP Renewal No: 039-37292-00141
Reviewer: Jean Fix

Resin Application (RTM)

Material (Note 2)	Density (Lb/Gal) (Note 4)	Weight % Styrene Monomer or VOC (Note 3)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Ton Processed per hour	Emission Factor (lb/ton)	Potential VOC pounds per hour	Potential Pounds of VOC per day	Potential VOC tons per year	Particulate Potential (ton/yr)	Transfer Efficiency (Note 1)
Non-CR/HS Production Resin	9.67	32.00%	0.352	1.00	0.002	19.20	0.03	0.78	0.14	0.00	100.00%

NOTES:
1) This emission unit uses closed molding, fluid resin transfer (pump) technology.
2) This emission unit uses non-corrosion resistant/non-high strength resin.
3) The VOC emission factor is based upon AP-42 for closed molding/polymer casting operations which is 3% of the available monomer content.
4) Density based upon Resin COR61-AA-257.

Catalyst

Material (Note 2)	Density (Lb/Gal)	Weight % Styrene Monomer or VOC (Note 3)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Ton Processed per hour	Emission Factor (lb/ton)	Potential VOC pounds per hour	Potential Pounds of VOC per day	Potential VOC tons per year	Particulate Potential (ton/yr)	Transfer Efficiency (Note 1)
Methyl Ethyl Ketone Peroxide	8.34	70.00%	0.0082	1.00	0.0000	2,000.00	0.048	1.15	0.21	0.00	100.00%

NOTES:
1) This emission unit uses closed molding, fluid resin transfer (pump) technology.
2) Cadox L-50A.
3) The VOC content is equal to the weight percent of 2,2,4-Trimethyl-1,3-pentanediol diisobutanoate.

Miscellaneous

Material	Density (Lb/Gal)	Weight % Styrene Monomer or VOC	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Ton Processed per hour	Emission Factor (lb/ton)	Potential VOC pounds per hour	Potential Pounds of VOC per day	Potential VOC tons per year	Particulate Potential (ton/yr)	Transfer Efficiency (Note 1)
Acetone	6.61	0.00%	0.0025	1.00	0.00001	2,000.00	0.00	0.00	0.00	0.00	100%

NOTES:
1) Manual application method.

Total Potential Emissions	**0.08**	**1.93**	**0.353**	**0.00**	
Control Efficiency - None			**0.00%**	**0.00%**	
Controlled Total Potential Emissions			**0.353**	**0.00**	

METHODOLOGY
Tons Processed per Hour (tons/hr) = Material Density (lb/gal) * Usage (gal/unit) * Maximum (units/hr) * 1/2,000 (lb/ton)
Potential VOC Pounds per Hour (lb/hr) = Tons Processed per Hour (tons/hr) * Emission Factor or Limit (lb/ton)
Potential VOC Pounds per Day (lb/day) = Pounds of VOC per Hour (lb/hr) * (24 hr/day)
Potential VOC Tons per Year (tons/yr) = Pounds of VOC per Hour (lb/hr) * 8,760 (hr/yr) * 1/2,000 (lbs/ton)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *8,760 (hrs/yr) * 1/2,000 (lbs/ton)

NOTES
Emission factors are based on AP-42 for Polymer Casting/Closed Molding.
Potenitial VOC Emissions from "Non-CR/HS Production" Resin Application = Potential HAP Emissions as Styrene.

Appendix A: Emissions Calculations
Potential VOC and Particulate Emissions
From Surface Coating Operations
Plant 1 Assembly Operations (P1-AO)

Company Name: Patrick Industries, Inc. d/b/a Better Way Products
Address City IN Zip: 70891 and 71103 County Road 23, New Paris, Indiana 46553
TVOP Renewal No: 039-37292-00141
Reviewer: Jean Fix

VOC and Particulate

Process	Manufacturer	Product Number	Use	Description	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water & Exempt	Weight % Organics	Volume % Water & Exempt	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 (See Notes Below)	Substrate	Application Method
Assembly	Lord	606	Adhesive	Lord Acrylic Adhesive	9.16	50.00%	0.00%	50.00%	0.00%	100.00%	0.0003	7.500	4.58	4.58	0.01	0.25	0.045	0.01	4.58	75%	Plastic	HVLP
Assembly	Lord	6	Adhesive	Adehesive Accelerator	12.68	3.60%	0.00%	3.60%	0.00%	94.40%	0.0003	7.500	0.46	0.46	0.001	0.02	0.004	0.03	0.48	75%	Plastic	HVLP
Assembly	Dow	3110	Caulk	RTV Silicone Rubber	9.51	7.00%	0.00%	7.00%	0.00%	91.13%	0.0005	7.500	0.67	0.67	0.002	0.06	0.011	0.00	0.73	100%	Plastic	Manual
Assembly	Superior	Acetone	Cleaner	Acetone	6.61	100.00%	100.00%	0.00%	100.00%	0.00%	0.0020	7.500	N/A	0.00	0.00	0.00	0.00	0.00	N/A	100%	Solvent Cleaner	Manual
Potential to Emit															**0.01**	**0.33**	**0.061**	**0.041**				

Transfer Efficiency - Hand or Manual Application = 100%; HVLP = 75%

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

HAZARDOUS AIR POLLUTANTS

Process	Manufacturer	Product Number	Use	Description	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % DMA	Weight % Methyl Methacrylate	DMA Emissions (ton/yr)	Methyl Methacrylate (ton/yr)	Total HAP Emissions (ton/yr)
Assembly	Lord	606	Adhesive	Lord Acrylic Adhesive	9.16	3.00E-04	7.500	5.00%	45.00%	0.005	0.041	0.045
Assembly	Lord	6	Adhesive	Adehesive Accelerator	12.68	3.00E-04	7.500	0.00%	0.00%	0.00	0.00	0.000
Assembly	Dow	3110	Caulk	RTV Silicone Rubber	9.51	5.00E-04	7.500	0.00%	0.00%	0.00	0.00	0.000
Assembly	Superior	Acetone	Cleaner	Acetone	6.61	2.00E-03	7.500	0.00%	0.00%	0.00	0.00	0.000
Uncontrolled Potential Emissions										**0.005**	**0.041**	**0.045**

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

Appendix A: Emissions Calculations
VOC and Particulate
From Gel and Resin Coating Operations
Reinforced Plastics and Composites Fiberglass Processes
Emission Unit (P5-G)

Company Name: Patrick Industries, Inc. d/b/a Better Way Products
Address City IN Zip: 70891 and 71103 County Road 23, New Paris, Indiana 46553
TVOP Renewal No: 039-37292-00141
Reviewer: Jean Fix

Gel Coat Application (P5-G)

Material (Note 2)	Density (Lb/Gal) (Note 5)	Weight % Styrene Monomer or VOC (Notes 3 & 4)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Ton Processed per hour	40 CFR 63, Subpart WWWW Table 3 Emission Limit (lb/ton)	Potential VOC pounds per hour	Potential Pounds of VOC per day	Potential VOC tons per year	Particulate Potential (ton/yr)	Transfer Efficiency (Note 1)
Other Pigment Gelcoat	10.71	37.00%	1.788	7.50	0.072	377.00	27.07	649.74	118.58	99.08	75.00%

NOTES:
1) This emission unit uses high transfer efficiency air atomized application technology.
2) This emission unit is capable of applying either, "White or Off-white" or "Other Pigmented" Gelcoat as described in 40 CFR 63, Subpart WWWW. Of the two categories, "Other Pigmented" Gelcoat has the higher HAP monomer content and emission limit.
3) The maximum HAP monomer content for the category of "Other Pigmented" Gelcoat is 37.0% by weight styrene. This complies with the previous BACT Determination.
4) Total VOC content equals total HAP content as styrene.
5) Density based upon Valspar Gray Sanding Gelcoat 5779E90254.

Catalyst

Material (Note 2)	Density (Lb/Gal)	Weight % Styrene Monomer or VOC (Note 3)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Ton Processed per hour	Emission Factor (lb/ton)	Potential VOC pounds per hour	Potential Pounds of VOC per day	Potential VOC tons per year	Particulate Potential (ton/yr)	Transfer Efficiency (Note 1)
Methyl Ethyl Ketone Peroxide	8.34	70.00%	0.0460	7.50	0.0014	2,000.00	2.014	48.34	8.82	0.95	75.00%

NOTES:
1) This emission unit uses high transfer efficiency air atomized application technology.
2) Cadox L-50A.
3) The VOC content is equal to the weight percent of 2,2,4-Trimethyl-1,3-pentanediol diisobutanoate.

Miscellaneous

Material	Density (Lb/Gal)	Weight % Styrene Monomer or VOC	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Ton Processed per hour	Emission Factor (lb/ton)	Potential VOC pounds per hour	Potential Pounds of VOC per day	Potential VOC tons per year	Particulate Potential (ton/yr)	Transfer Efficiency (Note 1)
Acetone	6.61	0.00%	0.050	7.50	0.00124	2,000.00	0.00	0.00	0.00	0.00	100%

NOTES:
1) Manual application method.

Total Potential Emissions	**29.09**	**698.08**	**127.40**	**100.02**	
Control Efficiency - Dry Filters 95% Efficient			**0.00%**	**95.00%**	
Controlled Total Potential Emissions			**127.40**	**5.00**	

METHODOLOGY
Tons Processed per Hour (tons/hr) = Material Density (lb/gal) * Usage (gal/unit) * Maximum (units/hr) * 1/2,000 (lb/ton)
Potential VOC Pounds per Hour (lb/hr) = Tons Processed per Hour (tons/hr) * Emission Factor or Limit (lb/ton)
Potential VOC Pounds per Day (lb/day) = Pounds of VOC per Hour (lb/hr) * (24 hr/day)
Potential VOC Tons per Year (tons/yr) = Pounds of VOC per Hour (lb/hr) * 8,760 (hr/yr) * 1/2,000 (lbs/ton)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *8,760 (hrs/yr) * 1/2,000 (lbs/ton)

NOTES
Emission factors are based on the allowable emission limits of 40 CFR 63, Subpart WWWW, Table 3.
Potenitial VOC Emissions from "Other Pigmented" Gelcoat Application = Potential HAP Emissions as Styrene.

Appendix A: Emissions Calculations
VOC and Particulate
From Gel and Resin Coating Operations
Reinforced Plastics and Composites Fiberglass Processes
Emission Unit (P5-R)

Company Name: Patrick Industries, Inc. d/b/a Better Way Products
Address City IN Zip: 70891 and 71103 County Road 23, New Paris, Indiana 46553
TVOP Renewal No: 039-37292-00141
Reviewer: Jean Fix

Resin Application (P5-R)

Material (Note 2)	Density (Lb/Gal) (Note 5)	Weight % Styrene Monomer or VOC (Notes 3 & 4)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Ton Processed per hour	40 CFR 63, Subpart WWWW Table 3 Emission Limit (lb/ton)	Potential VOC pounds per hour	Potential Pounds of VOC per day	Potential VOC tons per year	Particulate Potential (ton/yr)	Transfer Efficiency (Note 1)
Non-CR/HS Production Resin	9.67	38.00%	4.441	7.50	0.161	88.00	14.17	340.12	62.07	0.00	100.00%

NOTES:
1) This emission unit uses non-atomized, high transfer efficiency application technology.
2) This emission unit uses non-corrosion resistant/non-high strength resin as defined in 40 CFR 63, Subpart WWWW.
3) The VOC content is equal to the highest allowable styrene content for the application method that would comply with the emission limit of 40 CFR 63, Subpart WWWW for neat Non-CR/HS Resin and the previous BACT Determination.
4) Total VOC content equals total HAP content as styrene.
5) Density based upon Resin COR61-AA-257.

Catalyst

Material (Note 2)	Density (Lb/Gal)	Weight % Styrene Monomer or VOC (Note 3)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Ton Processed per hour	Emission Factor (lb/ton)	Potential VOC pounds per hour	Potential Pounds of VOC per day	Potential VOC tons per year	Particulate Potential (ton/yr)	Transfer Efficiency (Note 1)
Methyl Ethyl Ketone Peroxide	8.34	70.00%	0.1030	7.50	0.0032	2,000.00	4.510	108.24	19.75	0.00	100.00%

NOTES:
1) This emission unit uses non-atomized application technology for resin application.
2) Cadox L-50A.
3) The VOC content is equal to the weight percent of 2,2,4-Trimethyl-1,3-pentanediol diisobutanoate.

Miscellaneous

Material	Density (Lb/Gal)	Weight % Styrene Monomer or VOC	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Ton Processed per hour	Emission Factor (lb/ton)	Potential VOC pounds per hour	Potential Pounds of VOC per day	Potential VOC tons per year	Particulate Potential (ton/yr)	Transfer Efficiency (Note 1)
Acetone	6.61	0.00%	0.075	7.50	0.00186	2,000.00	0.00	0.00	0.00	0.00	100%

NOTES:
1) Manual application method.

Total Potential Emissions	**18.68**	**448.36**	**81.83**	**0.00**	
Control Efficiency - Dry Filters 95% Efficient			**0.00%**	**95.00%**	
Controlled Total Potential Emissions			**81.83**	**0.00**	

METHODOLOGY
Tons Processed per Hour (tons/hr) = Material Density (lb/gal) * Usage (gal/unit) * Maximum (units/hr) * 1/2,000 (lb/ton)
Potential VOC Pounds per Hour (lb/hr) = Tons Processed per Hour (tons/hr) * Emission Factor or Limit (lb/ton)
Potential VOC Pounds per Day (lb/day) = Pounds of VOC per Hour (lb/hr) * (24 hr/day)
Potential VOC Tons per Year (tons/yr) = Pounds of VOC per Hour (lb/hr) * 8,760 (hr/yr) * 1/2,000 (lbs/ton)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *8,760 (hrs/yr) * 1/2,000 (lbs/ton)

NOTES
Emission factors are based on the allowable emission limits of 40 CFR 63, Subpart WWWW, Table 3.
Potenitial VOC Emissions from "Non-CR/HS Production" Resin Application = Potential HAP Emissions as Styrene.

Appendix A: Emissions Calculations
VOC and Particulate
From Gel and Resin Coating Operations
Reinforced Plastics and Composites Fiberglass Processes
Emission Unit (P5-LTGR)

Company Name: Patrick Industries, Inc. d/b/a Better Way Products
Address City IN Zip: 70891 and 71103 County Road 23, New Paris, Indiana 46553
TVOP Renewal No: 039-37292-00141
Reviewer: Jean Fix

Gel Coat Application (P5-LTGR)

Material (Note 2)	Density (Lb/Gal) (Note 5)	Weight % Styrene Monomer or VOC (Notes 3 & 4)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Ton Processed per hour	40 CFR 63, Subpart WWWW Table 3 Emission Limit (lb/ton)	Potential VOC pounds per hour	Potential Pounds of VOC per day	Potential VOC tons per year	Particulate Potential (ton/yr)	Transfer Efficiency (Note 1)
Other Pigment Gelcoat	10.71	37.00%	0.061	7.50	0.002	377.00	0.92	22.17	4.05	3.38	75.00%

NOTES:
1) This emission unit uses high transfer efficiency air atomized application technology.
2) This emission unit is capable of applying either, "White or Off-white" or "Other Pigmented" Gelcoat as described in 40 CFR 63, Subpart WWWW. Of the two categories, "Other Pigmented" Gelcoat has the higher HAP monomer content and emission limit.
3) The maximum HAP monomer content for the category of "Other Pigmented" Gelcoat is 37.0% by weight styrene. This complies with the previous BACT Determination.
4) Total VOC content equals total HAP content as styrene.
5) Density based upon Valspar Gray Sanding Gelcoat 5779E90254.

Resin Application (P5-LTGR)

Material (Note 2)	Density (Lb/Gal) (Note 5)	Weight % Styrene Monomer or VOC (Notes 3 & 4)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Ton Processed per hour	40 CFR 63, Subpart WWWW Table 3 Emission Limit (lb/ton)	Potential VOC pounds per hour	Potential Pounds of VOC per day	Potential VOC tons per year	Particulate Potential (ton/yr)	Transfer Efficiency (Note 1)
Non-CR/HS Production Resin	9.67	38.00%	1.047	7.50	0.038	88.00	3.34	80.19	14.63	0.00	100.00%

NOTES:
1) This emission unit uses non-atomized, high transfer efficiency application technology.
2) This emission unit uses non-corrosion resistant/non-high strength resin as defined in 40 CFR 63, Subpart WWWW.
3) The VOC content is equal to the highest allowable styrene content for the application method that would comply with the emission limit of 40 CFR 63, Subpart WWWW for neat Non-CR/HS Resin and the previous BACT Determination.
4) Total VOC content equals total HAP content as styrene.
5) Density based upon Resin COR61-AA-257.

Catalyst

Material (Note 2)	Density (Lb/Gal)	Weight % Styrene Monomer or VOC (Note 3)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Ton Processed per hour	Emission Factor (lb/ton)	Potential VOC pounds per hour	Potential Pounds of VOC per day	Potential VOC tons per year	Particulate Potential (ton/yr)	Transfer Efficiency (Note 1)
Methyl Ethyl Ketone Peroxide - Gel Coat	8.34	70.00%	0.0157	7.50	0.0005	2,000.00	0.687	16.50	3.01	0.32	75.00%
Methyl Ethyl Ketone Peroxide - Resin	8.34	70.00%	0.0243	7.50	0.0008	2,000.00	1.064	25.54	4.66	0.10	95.00%

NOTES:
1) This emission unit uses high transfer efficiency air atomized application technology for gel coat application and non-atomized application technology for resin application.
2) Cadox L-50A.
3) The VOC content is equal to the weight percent of 2,2,4-Trimethyl-1,3-pentanediol diisobutanoate.

Miscellaneous

Material	Density (Lb/Gal)	Weight % Styrene Monomer or VOC	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Ton Processed per hour	Emission Factor (lb/ton)	Potential VOC pounds per hour	Potential Pounds of VOC per day	Potential VOC tons per year	Particulate Potential (ton/yr)	Transfer Efficiency (Note 1)
Acetone	6.61	0.00%	0.010	7.50	0.00025	2,000.00	0.00	0.00	0.00	0.00	100%

NOTES:
1) Manual application method.

Total Potential Emissions	**6.02**	**144.39**	**26.35**	**3.80**	
Control Efficiency - Dry Filters 95% Efficient			**0.00%**	**95.00%**	
Controlled Total Potential Emissions			**26.35**	**0.190**	

METHODOLOGY
Tons Processed per Hour (tons/hr) = Material Density (lb/gal) * Usage (gal/unit) * Maximum (units/hr) * 1/2,000 (lb/ton)
Potential VOC Pounds per Hour (lb/hr) = Tons Processed per Hour (tons/hr) * Emission Factor or Limit (lb/ton)
Potential VOC Pounds per Day (lb/day) = Pounds of VOC per Hour (lb/hr) * (24 hr/day)
Potential VOC Tons per Year (tons/yr) = Pounds of VOC per Hour (lb/hr) * 8,760 (hr/yr) * 1/2,000 (lbs/ton)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *8,760 (hrs/yr) * 1/2,000 (lbs/ton)

NOTES
Emission factors are based on the allowable emission limits of 40 CFR 63, Subpart WWWW, Table 3.
Potenitial VOC Emissions from "Other Pigmented" Gelcoat Application and "Non-CR/HS Production" Resin Application = Potential HAP Emissions as Styrene.

Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations
Plant 5 Assembly Operations (P5-AO)

Company Name: Patrick Industries, Inc. d/b/a Better Way Products
Address City IN Zip: 70891 and 71103 County Road 23, New Paris, Indiana 46553
TVOP Renewal No: 039-37292-00141
Reviewer: Jean Fix

CRITERIA POLLUTANTS

Process	Manufacturer	Product Number	Use	Description	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water & Exempt	Weight % Organics	Volume % Water & Exempt	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 (See Notes Below)	Substrate	Application Method
Assembly	Lord	606	Adhesive	Lord Acrylic Adhesive	9.16	50.00%	0.00%	50.00%	0.00%	100.00%	0.0003	7.500	4.58	4.58	0.01	0.25	0.045	0.01	4.58	75%	Plastic	HVLP
Assembly	Lord	6	Adhesive	Adehesive Accelerator	12.68	3.60%	0.00%	3.60%	0.00%	94.40%	0.0003	7.500	0.46	0.46	0.001	0.02	0.0045	0.03	0.48	75%	Plastic	HVLP
Assembly	Dow	3110	Caulk	RTV Silicone Rubber	9.51	7.00%	0.00%	7.00%	0.00%	91.13%	0.0005	7.500	0.67	0.67	0.002	0.06	0.011	0.00	0.73	100%	Plastic	Manual
Assembly	Superior	Acetone	Cleaner	Acetone	6.61	100.00%	100.00%	0.00%	100.00%	0.00%	0.0020	7.500	N/A	0.00	0.00	0.00	0.00	0.00	N/A	100%	Solvent Cleaner	Manual
Potential to Emit															**0.01**	**0.33**	**0.061**	**0.04**				

Transfer Efficiency - Hand or Manual Application = 100%, HVLP = 75%

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

HAZARDOUS AIR POLLUTANTS

Process	Manufacturer	Product Number	Use	Description	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % DMA	Weight % Methyl Methacrylate	DMA Emissions (ton/yr)	Methyl Methacrylate (ton/yr)	Total HAP Emissions (ton/yr)
Assembly	Lord	606	Adhesive	Lord Acrylic Adhesive	9.16	3.00E-04	7.500	5.00%	45.00%	0.005	0.04	0.045
Assembly	Lord	6	Adhesive	Adehesive Accelerator	12.68	3.00E-04	7.500	0.00%	0.00%	0.00	0.00	0.000
Assembly	Dow	3110	Caulk	RTV Silicone Rubber	9.51	5.00E-04	7.500	0.00%	0.00%	0.00	0.00	0.000
Assembly	Superior	Acetone	Cleaner	Acetone	6.61	2.00E-03	7.500	0.00%	0.00%	0.00	0.00	0.000
Uncontrolled Potential Emissions										**0.005**	**0.04**	**0.045**

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

Appendix A: Emissions Calculations
Potential VOC and Particulate Emissions
From Gel and Resin Coating Operations
Reinforced Plastics and Composites Fiberglass Processes
Emission Unit Tooling Gelcoat and Resin Operation (Plant 3) Booth P3-R/G

Company Name: Patrick Industries, Inc. d/b/a Better Way Products
Address City IN Zip: 70891 and 71103 County Road 23, New Paris, Indiana 46553
TVOP Renewal No: 039-37292-00141
Reviewer: Jean Fix

Gel Coat Application (P3-R/G)

Material (Note 2)	Density (Lb/Gal) (Note 5)	Weight % Styrene Monomer or VOC (Notes 3 & 4)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Ton Processed per hour	40 CFR 63, Subpart WWWW Table 3 Emission Limit (lb/ton)	Potential VOC pounds per hour	Potential Pounds of VOC per day	Potential VOC tons per year	Particulate Potential (ton/yr)	Transfer Efficiency (Note 1)
Tooling Gelcoat	9.87	40.00%	1.218	0.10	0.001	440.00	0.26	6.35	1.16	0.79	75.00%

NOTES:
1) This emission unit uses high transfer efficiency air atomized application technology.
2) This emission unit uses tooling gelcoat as defined in 40 CFR 63, Subpart WWWW.
3) The maximum HAP monomer content for the category of "Tooling" Gelcoat is 40.0% by weight. This is split 92.5% styrene and 7.5% MMA per the MSDS.
4) Total VOC content equals total HAP content as styrene.
5) Density based upon Black Tooling Gelcoat 85-801670.

Resin Application (P3-R/G)

Material (Note 2)	Density (Lb/Gal) (Note 5)	Weight % Styrene Monomer or VOC (Notes 3 & 4)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Ton Processed per hour	40 CFR 63, Subpart WWWW Table 3 Emission Limit (lb/ton)	Potential VOC pounds per hour	Potential Pounds of VOC per day	Potential VOC tons per year	Particulate Potential (ton/yr)	Transfer Efficiency (Note 1)
Tooling Resin - Non-Atomized Application	9.34	91.40%	9.581	0.10	0.004	254.00	1.14	27.28	4.98	0.17	95.00%
Tooling Resin - Manual Application	9.67	45.90%	4.071	0.10	0.002	157.00	0.31	7.42	1.35	0.00	100.00%

NOTES:
1) This emission unit uses non-atomized, high transfer efficiency application technology and manual or hand application technology ("manual application").
2) This emission unit uses tooling resins as defined in 40 CFR 63, Subpart WWWW.
3) The VOC content is equal to the highest allowable styrene content for the application method that would comply with the emission limit of 40 CFR 63, Subpart WWWW for tooling resin application.
4) Total VOC content equals total HAP content as styrene.
5) Density based upon Vinyl Ester Resin CORVE8115 for Non-Atomized Application and XL Micrcel Bodyfiller for Manual Application.

Catalyst

Material (Note 2)	Density (Lb/Gal)	Weight % Styrene Monomer or VOC (Note 3)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Ton Processed per hour	Emission Factor (lb/ton)	Potential VOC pounds per hour	Potential Pounds of VOC per day	Potential VOC tons per year	Particulate Potential (ton/yr)	Transfer Efficiency (Note 1)
Methyl Ethyl Ketone Peroxide	8.34	70.00%	0.0288	0.10	0.00001	2,000.00	0.0168	0.40	0.074	0.01	75.00%
Methyl Ethyl Ketone Peroxide - Non-Atomized Application	8.34	70.00%	0.2146	0.10	0.0001	2,000.00	0.125	3.01	0.55	0.01	95.00%
Methyl Ethyl Ketone Peroxide - Manual Application	8.34	70.00%	0.0944	0.10	0.00004	2,000.00	0.055	1.32	0.24	0.00	100.00%

NOTES:
1) This emission unit uses high transfer efficiency air atomized application technology for gel coat application and non-atomized and manual application technology for resin application.
2) Cadox L-50A.
3) The VOC content is equal to the weight percent of 2,2,4-Trimethyl-1,3-pentanediol diisobutanoate.

Miscellaneous

Material	Density (Lb/Gal)	Weight % Styrene Monomer or VOC	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Ton Processed per hour	Emission Factor (lb/ton)	Potential VOC pounds per hour	Potential Pounds of VOC per day	Potential VOC tons per year	Particulate Potential (ton/yr)	Transfer Efficiency (Note 1)
Mold Release/Wax (Xtend 19CMS)	6.19	98.00%	0.500	0.10	0.00015	2,000.00	0.30	7.28	1.33	0.00	100%
Acetone	6.61	0.00%	0.050	0.10	0.00002	2,000.00	0.00	0.00	0.00	0.00	100%

NOTES:
1) Manual application method.

Total Potential Emissions	**2.21**	**53.05**	**9.68**	**0.98**	
Control Efficiency - Dry Filters 95% Efficient			**0.00%**	**95.00%**	
Controlled Total Potential Emissions			**9.68**	**0.049**	

METHODOLOGY
Tons Processed per Hour (tons/hr) = Material Density (lb/gal) * Usage (gal/unit) * Maximum (units/hr) * 1/2,000 (lb/ton)
Potential VOC Pounds per Hour (lb/hr) = Tons Processed per Hour (tons/hr) * Emission Factor or Limit (lb/ton)
Potential VOC Pounds per Day (lb/day) = Pounds of VOC per Hour (lb/hr) * (24 hr/day)
Potential VOC Tons per Year (tons/yr) = Pounds of VOC per Hour (lb/hr) * 8,760 (hr/yr) * 1/2,000 (lbs/ton)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *8,760 (hrs/yr) * 1/2,000 (lbs/ton)

NOTES
Emission factors are based on the allowable emission limits of 40 CFR 63, Subpart WWWW, Table 3.
Ninety-two and One Half Percent (92.5%) Potenitial VOC Emissions from "Tooling" Gelcoat Application and "Tooling" Resin Application = Potential HAP Emissions as Styrene.
Seven and One Half Percent (7.5%) Potenitial VOC Emissions from "Tooling" Gelcoat Application = Potential HAP Emissions as MMA.

Appendix A: Emissions Calculations
VOC and Particulate
Reinforced Plastics and Composites Fiberglass Processes
Plant 1 Final Finish Operations (P1-FF)

Company Name: Patrick Industries, Inc. d/b/a Better Way Products
Address City IN Zip: 70891 and 71103 County Road 23, New Paris, Indiana 46553
TVOP Renewal No: 039-37292-00141
Reviewer: Jean Fix

Gel Coat Application (P1-FF)

Material (Note 2)	Density (Lb/Gal) (Note 5)	Weight % Styrene Monomer or VOC (Notes 3 & 4)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Ton Processed per hour	40 CFR 63, Subpart WWWW Table 3 Emission Limit (lb/ton)	Potential VOC pounds per hour	Potential Pounds of VOC per day	Potential VOC tons per year	Particulate Potential (ton/yr)	Transfer Efficiency (Note 1)
Other Pigment Gelcoat	10.71	37.00%	0.016	7.50	0.0006	377.00	0.24	5.81	1.06	0.00	100.00%

NOTES:
1) This emission unit uses manual application of gelcoat.
2) This emission unit is capable of applying either, "White or Off-white" or "Other Pigmented" Gelcoat as described in 40 CFR 63, Subpart WWWW. Of the two categories, "Other Pigmented" Gelcoat has the higher HAP monomer content and emission limit.
3) The maximum HAP monomer content for the category of "Other Pigmented" Gelcoat is 37.0% by weight styrene.
4) Total VOC content equals total HAP content as styrene.
5) Density based upon Valspar Gray Sanding Gelcoat 5779E90254.

Resin Application (P1-FF)

Material (Note 2)	Density (Lb/Gal) (Note 5)	Weight % Styrene Monomer or VOC (Notes 3 & 4)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Ton Processed per hour	40 CFR 63, Subpart WWWW Table 3 Emission Limit (lb/ton)	Potential VOC pounds per hour	Potential Pounds of VOC per day	Potential VOC tons per year	Particulate Potential (ton/yr)	Transfer Efficiency (Note 1)
Non-CR/HS Production Resin	9.67	33.70%	0.025	7.50	0.0009	87.00	0.08	1.89	0.35	0.00	100.00%

NOTES:
1) This emission unit uses manual application of resin.
2) This emission unit uses non-corrosion resistant/non-high strength resin as defined in 40 CFR 63, Subpart WWWW.
3) The VOC content is equal to the highest allowable styrene content for the application method that would comply with the emission limit of 40 CFR 63, Subpart WWWW for neat Non-CR/HS Resin.
4) Total VOC content equals total HAP content as styrene.
5) Density based upon Resin COR61-AA-257.

Catalyst

Material (Note 2)	Density (Lb/Gal)	Weight % Styrene Monomer or VOC (Note 3)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Ton Processed per hour	Emission Factor (lb/ton)	Potential VOC pounds per hour	Potential Pounds of VOC per day	Potential VOC tons per year	Particulate Potential (ton/yr)	Transfer Efficiency (Note 1)
Methyl Ethyl Ketone Peroxide - Gel Coat	8.34	70.00%	0.00032	7.50	0.0000	2,000.00	0.0140	0.336	0.061	0.00	100.00%
Methyl Ethyl Ketone Peroxide - Resin	8.34	70.00%	0.00063	7.50	0.0000	2,000.00	0.0276	0.662	0.1208	0.00	100.00%

NOTES:
1) This emission unit uses manual application for resins and gelcoats.
2) Cadox L-50A.
3) The VOC content is equal to the weight percent of 2,2,4-Trimethyl-1,3-pentanediol diisobutanoate.

Adhesives & Sealants (P1-FF)

Material	Density (Lb/Gal)	Weight % Styrene Monomer or VOC	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Ton Processed per hour	Emission Factor (lb/ton)	Potential VOC pounds per hour	Potential Pounds of VOC per day	Potential VOC tons per year	Particulate Potential (ton/yr)	Transfer Efficiency (Note 1)
3M 77 Adhesive	5.81	75.00%	0.00029	7.50	0.000006	2,000.00	0.009	0.23	0.04	0.007	50%

NOTES:
1) This emission unit uses aerosol application.
2) HAP Emissions = 1% of VOC Emissions as Hexane: 0.0004 Tons/Year Hexane

Miscellaneous

Material	Density (Lb/Gal)	Weight % Styrene Monomer or VOC	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Ton Processed per hour	Emission Factor (lb/ton)	Potential VOC pounds per hour	Potential Pounds of VOC per day	Potential VOC tons per year	Particulate Potential (ton/yr)	Transfer Efficiency (Note 1)
Menzerna Polishing Compound	10.84	50.00%	0.0050	7.50	0.00020	2,000.00	0.20	4.88	0.89	0.00	100%
Transparent Layout Fluid	7.01	89.44%	0.0001	7.50	0.000003	2,000.00	0.005	0.11	0.02	0.00	100%
Acetone	6.61	0.00%	0.0015	7.50	0.00004	2,000.00	0.00	0.00	0.00	0.00	100%

NOTES:
1) Manual application method.

Total Potential Emissions	**0.58**	**13.92**	**2.54**	**0.007**	
Control Efficiency - None			**0.00%**	**0.00%**	
Controlled Total Potential Emissions			**2.54**	**0.007**	

METHODOLOGY
Tons Processed per Hour (tons/hr) = Material Density (lb/gal) * Usage (gal/unit) * Maximum (units/hr) * 1/2,000 (lb/ton)
Potential VOC Pounds per Hour (lb/hr) = Tons Processed per Hour (tons/hr) * Emission Factor or Limit (lb/ton)
Potential VOC Pounds per Day (lb/day) = Pounds of VOC per Hour (lb/hr) * (24 hr/day)
Potential VOC Tons per Year (tons/yr) = Pounds of VOC per Hour (lb/hr) * 8,760 (hr/yr) * 1/2,000 (lbs/ton)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *8,760 (hrs/yr) * 1/2,000 (lbs/ton)

NOTES
Emission factors are based on the allowable emission limits of 40 CFR 63, Subpart WWWW, Table 3.
Potenitial VOC Emissions from "Other Pigmented" Gelcoat Application and "Non-CR/HS Production" Resin Application = Potential HAP Emissions as Styrene.

Appendix A: Emissions Calculations
VOC and Particulate
Reinforced Plastics and Composites Fiberglass Processes
Plant 5 Final Finish Operations (P5-FF)

Company Name: Patrick Industries, Inc. d/b/a Better Way Products
Address City IN Zip: 70891 and 71103 County Road 23, New Paris, Indiana 46553
TVOP Renewal No: 039-37292-00141
Reviewer: Jean Fix

Gel Coat Application (P5-FF)

Material (Note 2)	Density (Lb/Gal) (Note 5)	Weight % Styrene Monomer or VOC (Notes 3 & 4)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Ton Processed per hour	40 CFR 63, Subpart WWWW Table 3 Emission Limit (lb/ton)	Potential VOC pounds per hour	Potential Pounds of VOC per day	Potential VOC tons per year	Particulate Potential (ton/yr)	Transfer Efficiency (Note 1)
Other Pigment Gelcoat	10.71	37.00%	0.016	7.50	0.0006	377.00	0.24	5.81	1.06	0.00	100.00%

NOTES:
1) This emission unit uses manual application of gelcoat.
2) This emission unit is capable of applying either, "White or Off-white" or "Other Pigmented" Gelcoat as described in 40 CFR 63, Subpart WWWW. Of the two categories, "Other Pigmented" Gelcoat has the higher HAP monomer content and emission limit.
3) The maximum HAP monomer content for the category of "Other Pigmented" Gelcoat is 37.0% by weight styrene.
4) Total VOC content equals total HAP content as styrene.
5) Density based upon Valspar Gray Sanding Gelcoat 5779E90254.

Resin Application (P5-FF)

Material (Note 2)	Density (Lb/Gal) (Note 5)	Weight % Styrene Monomer or VOC (Notes 3 & 4)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Ton Processed per hour	40 CFR 63, Subpart WWWW Table 3 Emission Limit (lb/ton)	Potential VOC pounds per hour	Potential Pounds of VOC per day	Potential VOC tons per year	Particulate Potential (ton/yr)	Transfer Efficiency (Note 1)
Non-CR/HS Production Resin	9.67	33.70%	0.025	7.50	0.0009	87.00	0.08	1.89	0.35	0.00	100.00%

NOTES:
1) This emission unit uses manual application of resin.
2) This emission unit uses non-corrosion resistant/non-high strength resin as defined in 40 CFR 63, Subpart WWWW.
3) The VOC content is equal to the highest allowable styrene content for the application method that would comply with the emission limit of 40 CFR 63, Subpart WWWW for neat Non-CR/HS Resin.
4) Total VOC content equals total HAP content as styrene.
5) Density based upon Resin COR61-AA-257.

Catalyst

Material (Note 2)	Density (Lb/Gal)	Weight % Styrene Monomer or VOC (Note 3)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Ton Processed per hour	Emission Factor (lb/ton)	Potential VOC pounds per hour	Potential Pounds of VOC per day	Potential VOC tons per year	Particulate Potential (ton/yr)	Transfer Efficiency (Note 1)
Methyl Ethyl Ketone Peroxide - Gel Coat	8.34	70.00%	0.00032	7.50	0.0000	2,000.00	0.0140	0.336	0.061	0.00	100.00%
Methyl Ethyl Ketone Peroxide - Resin	8.34	70.00%	0.00063	7.50	0.0000	2,000.00	0.0276	0.662	0.1208	0.00	100.00%

NOTES:
1) This emission unit uses manual application for resins and gelcoats.
2) Cadox L-50A.
3) The VOC content is equal to the weight percent of 2,2,4-Trimethyl-1,3-pentanediol diisobutanoate.

Adhesives & Sealants (P5-FF)

Material	Density (Lb/Gal)	Weight % Styrene Monomer or VOC	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Ton Processed per hour	Emission Factor (lb/ton)	Potential VOC pounds per hour	Potential Pounds of VOC per day	Potential VOC tons per year	Particulate Potential (ton/yr)	Transfer Efficiency (Note 1)
3M 77 Adhesive	5.81	75.00%	0.00029	7.50	0.000006	2,000.00	0.009	0.23	0.04	0.007	50%

NOTES:
1) This emission unit uses aerosol application.
2) HAP Emissions = 1% of VOC Emissions as Hexane: 0.0004 Tons/Year Hexane

Miscellaneous

Material	Density (Lb/Gal)	Weight % Styrene Monomer or VOC	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Ton Processed per hour	Emission Factor (lb/ton)	Potential VOC pounds per hour	Potential Pounds of VOC per day	Potential VOC tons per year	Particulate Potential (ton/yr)	Transfer Efficiency (Note 1)
Menzerna Polishing Compound	10.84	50.00%	0.0050	7.50	0.00020	2,000.00	0.20	4.88	0.89	0.00	100%
Transparent Layout Fluid	7.01	89.44%	0.0001	7.50	0.000003	2,000.00	0.005	0.11	0.02	0.00	100%
Acetone	6.61	0.00%	0.0015	7.50	0.00004	2,000.00	0.00	0.00	0.00	0.00	100%

NOTES:
1) Manual application method.

Total Potential Emissions	**0.58**	**13.92**	**2.54**	**0.007**	
Control Efficiency - None			**0.00%**	**0.00%**	
Controlled Total Potential Emissions			**2.54**	**0.007**	

METHODOLOGY
Tons Processed per Hour (tons/hr) = Material Density (lb/gal) * Usage (gal/unit) * Maximum (units/hr) * 1/2,000 (lb/ton)
Potential VOC Pounds per Hour (lb/hr) = Tons Processed per Hour (tons/hr) * Emission Factor or Limit (lb/ton)
Potential VOC Pounds per Day (lb/day) = Pounds of VOC per Hour (lb/hr) * (24 hr/day)
Potential VOC Tons per Year (tons/yr) = Pounds of VOC per Hour (lb/hr) * 8,760 (hr/yr) * 1/2,000 (lbs/ton)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *8,760 (hrs/yr) * 1/2,000 (lbs/ton)

NOTES
Emission factors are based on the allowable emission limits of 40 CFR 63, Subpart WWWW, Table 3.
Potenitial VOC Emissions from "Other Pigmented" Gelcoat Application and "Non-CR/HS Production" Resin Application = Potential HAP Emissions as Styrene.

Appendix A: Emission Calculations
VOC, HAP, and PM/PM_{10} Emission Calculations
for One (1) Resin Transfer Molding Operation (RTM1)

Company Name: Patrick Industries, Inc. d/b/a Better Way Products
Address City IN Zip: 70891 and 71103 County Road 23, New Paris, Indiana 46553
TVOP Renewal No: 039-37292-00141
Reviewer: Jean Fix

Unit	Application Method	Material[1]	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)	VOC Control Efficiency (%)	PTE of VOC after Controls (ton/yr)	PTE of PM/PM10 before Controls (lbs/hr)[3]	PTE of PM/PM10 before Controls (tons/yr)[3]	Transfer Efficiency[4]	PM/PM10 Control Efficiency[5]	PTE of PM/PM10 after Controls (lbs/hr)	PTE of PM/PM10 after Controls (tons/yr)
RTM1	Resin Transfer Molding	Production Resin	10.01	55.00%	5.00	0.60	30.03	33.00	0.50	11.89	2.17	0.00%	2.17	0.00	0.00	100.00%	0%	0.00	0.00
24/25-1RC	Resin Transfer Molding	MEKP	8.41	70.00%	2.00	0.078	1.31	40.00	0.03	0.63	0.11	0.00%	0.11	0.00	0.00	100.00%	0%	0.00	0.00
Total									**0.52**	**12.52**	**2.29**		**2.29**		**0.00**				**0.00**

1) This units apply production resin.
2) The emission factors for resin are ***the sum of the*** weight percentages for styrene and MMA multiplied by 2,000 and by the AP-42 Emission Factor of 3% for Closed Molding Operations.
Emission factor for MEKP = 2,000 *Wt% MEK in MEKP.
3) Assume all the PM emissions equal PM10 emissions.
4) The transfer efficiency is 100% for resin transfer injection molding.
5) The control efficiency includes 100% capture efficiency with no controls.

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 VOC after controls (tons/yr) = PTE of VOC before controls (tons/yr) * (1-VOC Control Eficiency)
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)
PTE of PM/PM10 after Controls (lbs/hr) = Max Usage (lbs/hr) * (1-Weight % VOC) * (1-Control Efficiency)
PTE of PM/PM10 after Controls (tons/yr) = Max Usage (lbs/hr) * (1-Weight % VOC) * (1-Control 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)	Weight % Styrene	Emission Styrene (lbs/ton)[1]	PTE Styrene (tons/yr)	Weight % MMA	Emission MMA (lbs/ton)[1]	PTE MMA (tons/yr)	Total HAPs (tons/yr)
RTM1	Resin Transfer Molding	Production Resin	10.01	5.00	0.60	30.03	47.00%	64	1.98	8.00%	4.80	0.32	**2.29**
Total PTE before Controls (tons/yr)									**1.98**			**0.32**	

[1] The emission factors for resin are the weight percentages for styrene and MMA multiplied by 2,000 and by the AP-42 Emission Factor of 3% for Closed Molding Operations.
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
Potential VOC and Particulate Emissions from
RTM Mold Preparation and Cleanup Operations
Resin mix and storage tanks
Company Name: Patrick Industries, Inc. d/b/a Better Way Products
Address City IN Zip: 70891 and 71103 County Road 23, New Paris, Indiana 46553
TVOP Renewal No: 039-37292-00141
Reviewer: Jean Fix

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	RTM1	7.30	99.00%	0.00%	99.00%	0.00%	1.50%	0.0500	5.00	7.23	7.23	1.81	43.36	7.91	0.00	481.80	100.00%
Acetone	RTM1	6.61	100.00%	100.00%	0.00%	100.00%	0.00%	0.0500	5.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100.00%
Potential Emissions												**1.81**	**43.36**	**7.91**	**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.

Resin Sheer Mix Tanks

Operation/Material	Unit ID/Control Device	Weight % Volatile (water & organics)	Volume % Water	Weight % Organics	Filler/Powder Loading % Added to Unit	Maximum Throughput (tons/year)	HAP/VOC (Styrene) Emission Factor from EPA 40 CFR Part 63, Subpart WWWW Tech. Background Information Document	HAP/VOC (Styrene) PTE (tons/year)	PM/PM10/PM2.5 Emission Factor *%	Uncontrolled PM/PM10/ PM2.5 PTE (tons/yr)	Uncontrolled PM/PM10/ PM2.5 PTE (lb/hr)
Plant 5 Sheer Mix Tank 1 (P5-RSM1)	Covered Mixing Operation	38.0%	0.0%	38.0%	40.0%	1175	0.50%	**1.34**	0.50%	**2.35**	0.54
Plant 5 Sheer Mix Tank 2 (P5-RSM2)	Covered Mixing Operation	38.0%	0.0%	38.0%	40.0%	1175	0.50%	**1.34**	0.50%	**2.35**	0.54
Plant 1 Sheer Mix Tank (P1-R2SM)	Covered Mixing Operation	38.0%	0.0%	38.0%	40.0%	1175	0.50%	**1.34**	0.50%	**2.35**	0.54
								4.02		**7.05**	

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

METHODOLOGY

*Weight % Organics taken from T039-30758-00141 for P5-R Production Resin (and it was identified as P5-R in this revision)
VOC/HAP Emissions, tons/yr = throughput, tons/yr * VOC weight % * Emission Factor * Weight % Resin In Mix (1 - Weight% Filler)
PM/PM10/PM2.5 Emissions, tons/yr = throughput, tons/yr * PM/PM10 Emission Factor * ton/2000 lb
PM/PM10/PM2.5 Emissions, lb/hr = PM/PM10/PM2.5 Emissions (tons/yr) * 2000 lb/ton / 8760 hrs/yr

Appendix A: Emissions Calculations
Reinforced Plastics and Composites
Mold Shop Operations - Plant 2
Resin and Gel Usage

Company Name: Patrick Industries, Inc. d/b/a Better Way Products
Address City IN Zip: 70891 and 71103 County Road 23, New Paris, Indiana 46553
TVOP Renewal No: 039-37292-00141
Reviewer: Jean Fix

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 Before control (tons/ year)	Potential PM After Control (tons/ year)**
MSGG1	Tooling Gel Coat - Styrene	9.87	40.00%	1.218	0.25	439	15.83	2.89	75%	1.82	
	Tooling Gel Coat - Methyl Methacrylate	9.87	5.00%	1.218	0.25	75	2.70	0.49	75%		
							Total	**3.38**		**1.82**	0.09
MSCG1	Tooling Resin - Styrene	8.72	49.84%	9.581	0.25	125.49	31.45	5.74	95%	2.15	
	Tooling Resin - Methyl Methacrylate	8.72	3.19%	9.581	0.25	8.03	2.01	0.37	95%		
							Total	**6.11**		**2.15**	0.1075

*HVLP Gelcoat Application and Fluid Impingement Technology (FIT) Resin Application
**dry filter control at 95% efficiency

METHODOLOGY

Unified Emission Factor (UEF) based on "Unified Emission Factors for Open Molding of Composites", published July 23, 2001, Revised October 13, 2009, by the Composites Fabricators Association (CFA)
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) * 24 hrs/day * 1 ton material/2000 lbs 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 ton/2000 lb)

Appendix A: Emissions Calculations
VOC and Particulate
Plant 2 Misc coating operation

Company Name: **Patrick Industries, Inc. d/b/a Better Way Products**
Address City IN Zip: **70891 and 71103 County Road 23, New Paris, Indiana 46553**
TVOP Renewal No: **039-37292-00141**
Reviewer: **Jean Fix**

Emissions Unit	Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	Transfer Efficiency
MSMISC	Zyvax Fiberglass Shield	7.31	90.00%	0.0%	90.0%	0.0%	0.00%	0.10	0.25	6.58	6.58	0.16	3.95	0.72	0.00	100%
MSGG1	Cadox L50A	8.34	4.00%	2.0%	2.0%	2.0%	0.00%	0.02	0.25	0.17	0.17	0.00	0.02	0.00	0.04	75%
MSCG1	Cadox L50A	8.34	4.00%	2.0%	2.0%	2.0%	0.00%	0.12	0.25	0.17	0.17	0.01	0.12	0.02	0.05	95%

Potential Emissions **0.17** **4.09** **0.75** **0.09**

Potential PM after 95% Control Efficiency 0.005

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)
Materials Do Not Contain Hazardous Air Pollutants

Appendix A: Emissions Calculations
Plant 3 Miscellaneous Particulate Matter Operations (P2-MPM)

Company Name: Patrick Industries, Inc. d/b/a Better Way Products
Address City IN Zip: 70891 and 71103 County Road 23, New Paris, Indiana 46553
TVOP Renewal No: 039-37292-00141
Reviewer: Jean Fix

Plywood Cutting for Mold Construction: **Throughput Weight :** **32.00 lb/hr**

Process/Operation	Make	Model	Description	Equipment ID	Material Thickness (in)	Cutting Surface Thickness (in)	Process Rate (in/hr)	Material Loss (in3/hr)	Material Density (lb/in3)	Material Loss (lb/hr)
Cutting	Delta	1601	Vertical Bandsaw	P3-BS	0.25	0.0625	24.00	0.38	0.014	0.01
Cutting	Delta	NA	Table Saw	P3-TS	0.25	0.125	96.00	3.00	0.014	0.04
Estimated Losses (lb/hr)										0.05
Estimated Emissions (tons/year)										0.21

METHODOLOGY

Material Loss (in3/hr) = Material Thickness (in) x Cutting Surface Thickness, e.g., Blade (in) x Process Rate (in/hr)

Material Density (lb/in3) = 32.0 lbs/Plywood Sheet / 2,304 (in3/sheet)

Material Loss (lb/hr) = Material Loss (in3/hr) x Material Density (lb/in3)

Emissions (tons/year) = Material Loss (lb/hr) x 8,760 (hrs/year) x 1/2,000 (lb/ton)

METHODOLOGY

Presume all loss of mass as particulate matter emissions as "worst case scenario".

Appendix A: Emissions Calculations
Potential Particulate Emissions from Grinding Operations

Company Name: Patrick Industries, Inc. d/b/a Better Way Products
Address City IN Zip: 70891 and 71103 County Road 23, New Paris, Indiana 46553
TVOP Renewal No: 039-37292-00141
Reviewer: Jean Fix

Uncontrolled Potential Emissions (tons/year)								
Process	No. of Units	Airflow (acfm)	Grain Loading per Actual Cubic Foot of Outlet Air	Air to Cloth Ratio Air Flow (acfm/ft²)	Total Filter Area (ft²)	Control Efficiency	Total (tons/yr)	Total (lbs/hr)
P1-GRIND	1	22,800	1.92E-03	114.0	200.00	98.50%	109.51	25.00
P5-GRIND#1	1	22,800	1.34E-03	114.0	200.00	98.50%	76.70	17.51
P5-GRIND#2	1	22,800	5.76E-04	114.0	200.00	98.50%	32.85	7.50
P2-MSGRIND1	1	5,000	1.00E-03	25.0	200.00	98.50%	12.51	2.86
Total Emissions Based on Rated Capacity at 8,760 Hours/Year (tons/year) =							**231.57**	
Total Emissions Based on Rated Capacity (lb/hr) =							**52.87**	

Controlled Potential Emissions (tons/year)								
Process	No. of Units	Airflow (acfm)	Grain Loading per Actual Cubic Foot of Outlet Air	Air to Cloth Ratio Air Flow (acfm/ft²)	Total Filter Area (ft²)	Control Efficiency	Total (tons/yr)	Total (lbs/hr)
P1-GRIND	1	22,800	1.92E-03	114.0	200.00	98.50%	1.64	0.38
P5-GRIND#1	1	22,800	1.34E-03	114.0	200.00	98.50%	1.15	0.26
P5-GRIND#2	1	22,800	5.76E-04	114.0	200.00	98.50%	0.493	0.11
P2-MSGRIND1	1	5,000	1.00E-03	25.0	200.00	98.50%	0.188	0.04

P2GRIND was modified to split the processing from 720 pounds per hour to 504 pounds per hour for P5-GRIND#1 and 216 pounds per hour for P5-GRIND#2, pursuant to SPM 039-23427-00141, issued February 21, 2007.

P1-GRIND was modified to split the processing from 720 pounds oer hour to 612 pounds per hour for P1-GRIND and 108 pounds per hour for P1-SPGRIND, pursuant to AA 03-24752-00141, issued September 13, 2007.

Total Emissions Based on Rated Capacity at 8,760 Hours/Year and source controls (tons/year) =	**3.47**
Total Emissions Based on Rated Capacity at 8,760 Hours/Year and source controls (lb/hr) =	**0.793**

326 IAC 6-3-2 Particulate	**P1-GRIND**	**P5-GRIND#1**	**P5-GRIND#2**	**P2-MSGRIND1**
Allowable Emission (lb/hr) = 4.10 X [Process Weight Rate]$^{0.67}$ =	**1.85**	**1.63**	**0.923**	**1.62**
Material Input Rate (lb/hr) =	**612.0**	**504.0**	**216.0**	**500**
Allowable Emission (tons/yr) =	**8.12**	**7.13**	**4.04**	**7.09**

METHODOLOGY

Uncontrolled Potential Emission(tons/yr) = [No. Units * Loading (grains/acf) * Air/Cloth Ratio (acfm/ft²) * Filter Area (ft²) * 1 lb/7,000 grains * 60 min/hr * 8760 hr/yr * 1 ton/2,000 lbs * 1/(1-Control Efficiency)]

Controlled Potential Emission (tons/yr) = [No. Units * Loading (grains/acf) * Air/Cloth Ratio (acfm/ft²) * Filter Area (ft²) * 1 lb/7,000 grains * 60 min/hr * 8760 hr/yr * 1 ton/2,000 lbs]

Process/Operation	**Description**	**Equipment ID**	**Surface Thickness Removed (in)**	**Surface Width Removed (in)**	**Surface Distance (in/hr)**	**Material Loss (in3/hr)**	**Material Density (lb/in3)**	**Material Loss (lb/hr)**
Grinding	Hand Grinder	P1-SPGRIND	0.06250	4.00	25.00	6.25	0.022	0.14
Estimated Losses (lb/hr)								0.14
Uncontrolled Emissions (tons/year)								0.60

METHODOLOGY

Material Loss (in3/hr) = Surface Thickness (in) x Surface Width (in) x Surface Distance (in/hr)

Material Density (lb/in3) = 38 lbs/ft3

Material Loss (lb/hr) = Material Loss (in3/hr) x Material Density (lb/in3)

Emissions (tons/year) = Material Loss (lb/hr) x 8,760 (hrs/year) x 1/2,000 (lb/ton)

Assume all loss of mass as particulate matter emissions as "worst case scenario".

Appendix A: Emissions Calculations
Acetone Recyling Unit (P5-AR)

Company Name: Patrick Industries, Inc., d/b/a Better Way Products
Address City IN Zip: 70891 County Road 23, New Paris, Indiana 46553
TVOP Renewal No: 039-37292-00141
Reviewer: Jean Fix

Material	Material Density (lb/gal)	Weight Percent Organic VOC	Material VOC Content (lb VOC/gal)	Material Throughput (gal/hr)	VOC Throughput (lb VOC/hr)	Emission Loss 100% of VOC Content	Potential VOC Emissions (lb VOC/hr)	Potential VOC Emissions (lb VOC/day)	Potential VOC Emissions (TPY)
Waste Acetone (R1-350)	6.65	0.039%	0.003	2.29	0.01	100.00%	0.01	0.14	0.03
Totals							**0.01**	**0.14**	**0.03**

METHODOLOGY

Material = Waste Acetone Cleanup Solvent from Equipment Cleaning for Production Operations; VOC Content Based Upon Waste Profile
VOC Throughput (lb VOC/hr) = Material Throughput (gal/hr) x Maximum Material VOC Content (lb VOC/gal)
Potential VOC Emissions (lb VOC/hr) = VOC Throughput (lb VOC/hr) x Presumed 100% Loss of VOC Content
Potential VOC Emissions (lb VOC/day) = Potential VOC Emissions (lb VOC/hr) x 24 (hr/day)
Potential VOC Emissions (tpy) = Potential VOC Emissions (lb VOC/hr) x 8,760 (hr/yr) x 1/2,000 (lb/ton)

Hazardous Air Pollutants

Material	Material Density (lb/gal)	Weight Percent Methanol	Material Methanol Content (lb/gal)	Material Throughput (gal/hr)	Methanol Throughput (lb HAP/hr)	Emission Loss 100% of Methanol Content	Potential Methanol Emissions (lb/hr)	Potential Methanol Emissions (lb/day)	Potential Methanol Emissions (TPY)
Waste Acetone (R1-350)	6.65	0.039%	0.003	2.29	0.01	100.00%	0.01	0.14	0.03
Totals							**0.01**	**0.14**	**0.03**

METHODOLOGY

HAP Throughput (lb HAP/hr) = Material Throughput (gal/hr) x Maximum Material HAP Content (lb HAP/gal)
Potential HAP Emissions (lb HAP/hr) = HAP Throughput (lb HAP/hr) x Presumed 100% Loss of HAP Content
Potential HAP Emissions (lb HAP/day) = Potential HAP Emissions (lb HAP/hr) x 24 (hr/day)

Appendix A: Emissions Calculations
Emission Losses from Two (2) Resin Storage Tanks (P1-RT1 & P5-RT1)

Company Name: Patrick Industries, Inc. d/b/a Better Way Products
Address City IN Zip: 70891 and 71103 County Road 23, New Paris, Indiana 46553
TVOP Renewal No: 039-37292-00141
Reviewer: Jean Fix

Resin Storage Tanks

	Total VOC Emission Losses as Styrene			
Emission Unit	**pounds/year**	**pounds/hour**	**pounds/day**	**tons/year**
P1-RT1	66.19	0.0076	0.1813	0.03
P5-RT1	59.16	0.0068	0.1621	0.03
				0.06

Methodology

The VOC potential passive emissions for the tanks were calculated using the U.S. EPA TANKS 4.0.9d program.

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

Company Name: Patrick Industries, Inc. d/b/a Better Way Products
Address City IN Zip: 70891 and 71103 County Road 23, New Paris, Indiana 46553
TVOP Renewal No: 039-37292-00141
Reviewer: Jean Fix

Heat Input Capacity MMBtu/hr	HHV mmBtu/mmscf	Potential Throughput MMCF/yr
18.0	1020	154.2

	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	0.15	0.59	0.59	0.05	7.71	0.42	6.47

*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
individual units are listed in NG Combus list tab

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

Hazardous Air Pollutants (HAPs)

	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	1.6E-04	9.2E-05	5.8E-03	0.14	2.6E-04	**0.15**

	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	3.9E-05	8.5E-05	1.1E-04	2.9E-05	1.6E-04	**4.2E-04**
					Total HAPs	**0.15**
					Worst HAP	**0.14**

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
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

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
NG Combustion Unit List - All Plants

Company Name: Patrick Industries, Inc. d/b/a Better Way Products
Address City IN Zip: 70891 and 71103 County Road 23, New Paris, Indiana 46553
TVOP Renewal No: 039-37292-00141
Reviewer: Jean Fix

Description	Number of Emission Units	Emission Unit ID	Heat Input Capacity Per Unit (MMBtu/hr)	Total Maximum Potential Throughput (MMCF/yr)
Air Makeup Unit, Plant 1	1	P1-A1	4.800	41.2
Radiant Heaters, Plant 1	8	P1-R1 to R8	0.150	10.3
Radiant Heaters, Plant 1	1	P1-R9	0.100	0.9
Office Heaters, Plant 1	2	P1-H1 to H2	0.100	1.7
Air Makeup Unit, Plant 2	1	P2-MSAM1	4.800	41.2
Radiant Heaters, Plant 2	5	MSRH1- MSRH5	0.150	6.4
Radiant Heaters, Plant 3	2	P3-R1 to R2	0.150	2.6
Radiant Heaters, Plant 3	1	P3-R3	0.100	0.9
Air-makeup unit, Plant 5	1	P5-A1	4.800	41.2
Radiant Heaters, Plant 5	6	P5-R1 to R6	0.150	7.7
TOTALS	**28**		**17.95**	**154.2**

Appendix A: Emission Calculations
Fugitive Dust Emissions - Unpaved Roads

Company Name: Patrick Industries, Inc. dba Better Way Products
Address City IN Zip: 70891 County Road 23, New Paris, Indiana 46553
Permit Number: 039-37292-00141
Reviewer: Jean Fix

Unpaved Roads at Industrial Site
The following calculations determine the amount of emissions created by unpaved roads, based on 8,760 hours of use and AP-42, Ch 13.2.2 (11/2006).

Vehicle Information (provided by source)

Type	Maximum number of vehicles	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight Loaded (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Freight Truck (5) Axels - Entry	4.0	1.0	4.0	40.0	160.0	250	0.047	0.2	69.1
Freight Truck (5) Axels - Departure	4.0	1.0	4.0	40.0	160.0	250	0.047	0.2	69.1
Moving Truck (2-axle) (24' Straight Truck) - Entry	8.0	1.0	8.0	9.0	72.0	500	0.095	0.8	276.5
Moving Truck (2-axle) (24' Straight Truck) - Departu	8.0	1.0	8.0	9.0	72.0	500	0.095	0.8	276.5
		Totals	**24.0**		**464.0**			**1.9**	**691.3**

Average Vehicle Weight Per Trip = 19.3 tons/trip
Average Miles Per Trip = 0.08 miles/trip

Unmitigated Emission Factor, Ef = k*[(s/12)^a]*[(W/3)^b] (Equation 1a from AP-42 13.2.2)

	PM	PM10	PM2.5	
where k =	4.9	1.5	0.15	lb/mi = particle size multiplier (AP-42 Table 13.2.2-2 for Industrial Roads)
s =	6.0	6.0	6.0	% = mean % silt content of unpaved roads (AP-42 Table 13.2.2-1 Iron and Steel Production)
a =	0.7	0.9	0.9	= constant (AP-42 Table 13.2.2-2 for Industrial Roads)
W =	19.3	19.3	19.3	tons = average vehicle weight (provided by source)
b =	0.45	0.45	0.45	= constant (AP-42 Table 13.2.2-2 for Industrial Roads)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, Eext = E * [(365 - P)/365] (Equation 2 from AP-42 13.2.2)
Mitigated Emission Factor, Eext = E * [(365 - P)/365]
where P = 125 days of rain greater than or equal to 0.01 inches (see Fig. 13.2.2-1)

	PM	PM10	PM2.5	
Unmitigated Emission Factor, Ef =	6.98	1.86	0.19	lb/mile
Mitigated Emission Factor, Eext =	4.59	1.22	0.12	lb/mile
Dust Control Efficiency =	0%	0%	0%	(pursuant to control measures outlined in fugitive dust control plan)

Process	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10 (tons/yr)	Unmitigated PTE of PM2.5 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM2.5 (tons/yr)	Controlled PTE of PM (tons/yr)	Controlled PTE of PM10 (tons/yr)	Controlled PTE of PM2.5 (tons/yr)
Freight Truck (5) Axels - Entry	0.24	0.06	0.01	0.16	0.04	0.00	0.16	0.04	0.00
Freight Truck (5) Axels - Departure	0.24	0.06	0.01	0.16	0.04	0.00	0.16	0.04	0.00
Moving Truck (2-axle) (24' Straight Truck) - Entry	0.96	0.26	0.03	0.63	0.17	0.02	0.63	0.17	0.02
Moving Truck (2-axle) (24' Straight Truck) - Departu	0.96	0.26	0.03	0.63	0.17	0.02	0.63	0.17	0.02
Totals	**2.41**	**0.64**	**0.06**	**1.59**	**0.42**	**0.04**	**1.59**	**0.42**	**0.04**

Methodology

Total Weight driven per day (ton/day)	= [Maximum Weight Loaded (tons/trip)] * [Maximum trips per day (trip/day)]
Maximum one-way distance (mi/trip)	= [Maximum one-way distance (feet/trip) / [5280 ft/mile]
Maximum one-way miles (miles/day)	= [Maximum trips per year (trip/day)] * [Maximum one-way distance (mi/trip)]
Average Vehicle Weight Per Trip (ton/trip)	= SUM[Total Weight driven per day (ton/day)] / SUM[Maximum trips per day (trip/day)]
Average Miles Per Trip (miles/trip)	= SUM[Maximum one-way miles (miles/day)] / SUM[Maximum trips per year (trip/day)]
Unmitigated PTE (tons/yr)	= (Maximum one-way miles (miles/yr)) * (Unmitigated Emission Factor (lb/mile)) * (ton/2000 lbs)
Mitigated PTE (tons/yr)	= (Maximum one-way miles (miles/yr)) * (Mitigated Emission Factor (lb/mile)) * (ton/2000 lbs)
Controlled PTE (tons/yr)	= (Mitigated PTE (tons/yr)) * (1 - Dust Control Efficiency)

Abbreviations
PM = Particulate Matter
PM10 = Particulate Matter (<10 um)
PM2.5 = Particulate Matter (<2.5 um)
PTE = Potential to Emit

Appendix A: Emission Calculations
Fugitive Dust Emissions - Paved Roads

Company Name: Patrick Industries, Inc. dba Better Way Products
Source Address: 70891 County Road 23, New Paris, Indiana 46553
Permit Number: 039-37292-00141
Reviewer: Jean Fix

Paved Roads at Industrial Site

The following calculations determine the amount of emissions created by paved roads, based on 8,760 hours of use and AP-42, Ch 13.2.1 (1/2011).

Vehicle Informtation (provided by source)

Type	Maximum number of vehicles per day	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight Loaded (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Freight Truck (5) Axels - Entry	4.0	1.0	4.0	40.0	160.0	500	0.095	0.4	138.3
Freight Truck (5) Axels - Departure	4.0	1.0	4.0	40.0	160.0	500	0.095	0.4	138.3
Moving Truck (2-axle) (24' Straight Truck) - Entry	8.0	1.0	8.0	9.0	72.0	500	0.095	0.8	276.5
Moving Truck (2-axle) (24' Straight Truck) - Departu	8.0	1.0	8.0	9.0	72.0	500	0.095	0.8	276.5
		Totals	**24.0**		**464.0**			**2.3**	**829.5**

Average Vehicle Weight Per Trip = 19.3 tons/trip
Average Miles Per Trip = 0.09 miles/trip

Unmitigated Emission Factor, Ef = [k * (sL)^0.91 * (W)^1.02] (Equation 1 from AP-42 13.2.1)

	PM	PM10	PM2.5	
where k =	0.011	0.0022	0.00054	lb/VMT = particle size multiplier (AP-42 Table 13.2.1-1)
W =	19.3	19.3	19.3	tons = average vehicle weight (provided by source)
sL =	9.7	9.7	9.7	g/m^2 = silt loading value for paved roads at iron and steel production facilities - Table 13.2.1-3)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, Eext = E * [1 - (p/4N)] (Equation 2 from AP-42 13.2.1)

Mitigated Emission Factor, Eext = Ef * [1 - (p/4N)]
where p = 125 days of rain greater than or equal to 0.01 inches (see Fig. 13.2.1-2)
N = 365 days per year

	PM	PM10	PM2.5	
Unmitigated Emission Factor, Ef =	1.784	0.357	0.0876	lb/mile
Mitigated Emission Factor, Eext =	1.631	0.326	0.0801	lb/mile
Dust Control Efficiency =	0%	0%	0%	(pursuant to control measures outlined in fugitive dust control plan)

Process	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10 (tons/yr)	Unmitigated PTE of PM2.5 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM2.5 (tons/yr)	Controlled PTE of PM (tons/yr)	Controlled PTE of PM10 (tons/yr)	Controlled PTE of PM2.5 (tons/yr)
Freight Truck (5) Axels - Entry	0.12	0.02	0.01	0.11	0.02	0.01	0.11	0.02	0.01
Freight Truck (5) Axels - Departure	0.12	0.02	0.01	0.11	0.02	0.01	0.11	0.02	0.01
Moving Truck (2-axle) (24' Straight Truck) - Entry	0.25	0.05	0.01	0.23	0.05	0.01	0.23	0.05	0.01
Moving Truck (2-axle) (24' Straight Truck) - Departu	0.25	0.05	0.01	0.23	0.05	0.01	0.23	0.05	0.01
Totals	**0.74**	**0.15**	**0.04**	**0.68**	**0.14**	**0.03**	**0.68**	**0.14**	**0.03**

Methodology

Total Weight driven per day (ton/day) = [Maximum Weight Loaded (tons/trip)] * [Maximum trips per day (trip/day)]
Maximum one-way distance (mi/trip) = [Maximum one-way distance (feet/trip) / [5280 ft/mile]
Maximum one-way miles (miles/day) = [Maximum trips per year (trip/day)] * [Maximum one-way distance (mi/trip)]
Average Vehicle Weight Per Trip (ton/trip) = SUM[Total Weight driven per day (ton/day)] / SUM[Maximum trips per day (trip/day)]
Average Miles Per Trip (miles/trip) = SUM[Maximum one-way miles (miles/day)] / SUM[Maximum trips per year (trip/day)]
Unmitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] * [Unmitigated Emission Factor (lb/mile)] * (ton/2000 lbs)
Mitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] * [Mitigated Emission Factor (lb/mile)] * (ton/2000 lbs)
Controlled PTE (tons/yr) = [Mitigated PTE (tons/yr)] * [1 - Dust Control Efficiency]

Abbreviations

PM = Particulate Matter
PM10 = Particulate Matter (<10 um)
PM2.5 = Particle Matter (<2.5 um)
PTE = Potential to Emit

Indiana Department of Environmental Management
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Michael R. Pence
Governor

Carol S. Comer
Commissioner

Notice of Public Comment

August 30, 2016
Patrick Industries, Inc. dba Better Way Products
039-37292-00141

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

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Carol S. Comer
Commissioner

AFFECTED STATE NOTIFICATION OF PUBLIC COMMENT PERIOD
DRAFT INDIANA AIR PERMIT

August 30, 2016

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

Permit Number: **039-37292-00141**
Applicant Name: **Patrick Industries, Inc. dba Better Way Products**
Location: **New Paris, Elkhart 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.

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Michael R. Pence
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Carol S. Comer
Commissioner

August 30, 2016

Mr. Pat Hare
Patrick Industries, Inc. dba Better Way Products
70891 County Road 23
New Paris, IN 46553

Re: Public Notice
Patrick Industries, Inc. dba Better Way Products
Permit Level: Part 70 Operating Permit Renewal
Permit Number: 039-37292-00141

Dear Mr. Hare:

Enclosed is a copy of your draft Part 70 Operating Permit Renewal, 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 Elkhart Truth in Elkhart, Indiana publish the abbreviated version of the public notice no later than August 30, 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 Goshen Public Library, 601 S 5th Street in Goshen, 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 Jean Fix, 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 4-8531 or dial (317) 234-8531.

Sincerely,

Greg Hotopp

Greg Hotopp
Permits Branch
Office of Air Quality

Enclosures
PN Applicant Cover letter 2/17/2016

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Michael R. Pence
Governor

Carol S. Comer
Commissioner

August 30, 2016

To: Goshen 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: Patrick Industries, Inc. dba Better Way Products
Permit Number: 039-37292-00141

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 2/16/2016

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Michael R. Pence
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Carol S. Comer
Commissioner

ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING

August 26

Elkhart Truth
421 South Second Street
PO Box 487
Elkhart, IN 46515

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for Patrick Industries, Inc. dba Better Way Products, Elkhart 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 August 30, 2016.

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

To ensure proper payment, please reference account # 100174737.

We are required by the Auditor's Office to request that you place the Federal ID Number on all claims. If you have any conflicts, questions, or problems with the publishing of this notice or if you do not receive complete public notice information for this notice, please call Catherine Denny at 800-451-6027 and ask for extension 4-5256 or dial 317-234-5256.

Sincerely,

Catherine Denny

Catherine Denny
Permit Branch
Office of Air Quality

Permit Level: Part 70 Operating Permit Renewal
Permit Number: 039-37292-00141

Enclosure

PN Newspaper.dot 2/17/2016

Mail Code 61-53

IDEM Staff	GHOTOPP 8/30/2016 Patrick Industries Incorporated dba Better Way Products 039-37292-00141 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		Pat Hare Patrick Industries Incorporated dba Better Way Pro 70891 County Road 23 New Paris IN 46553 (Source CAATS)									
2		Clint Decker Business Unit Director Patrick Industries Incorporated dba Better Way Pro 70891 County Road 23 New Paris IN 46553 *(RO CAATS)*									
3		Elkhart City Council and Mayors Office 229 South Second Street Elkhart IN 46516 *(Local Official)*									
4		Elkhart County Health Department 608 Oakland Avenue Elkhart IN 46516 *(Health Department)*									
5		Middlebury Town Council and Town Manager P.O. Box 812, 418 North Main Street Middlebury IN 46540 *(Local Official)*									
6		Goshen Public Library 601 S 5th St Goshen IN 46526-3994 *(Library)*									
7		Elkhart County Board of Commissioners 117 North Second St. Goshen IN 46526 *(Local Official)*									
8		Kevin Parks D & B Environmental 401 Lincoln Way West Osceola IN 46561 *(Consultant)*									
9											
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8			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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