



Indiana Department of Environmental Management

We Protect Hoosiers and Our Environment.

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

Michael R. Pence
Governor

Carol S. Comer
Commissioner

NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

Preliminary Findings Regarding a Significant Source Modification and a
Part 70 Operating Permit

for Indiana Composites, LLC in Marshall County

Part 70 Operating Permit No.: T099-37220-00118
Significant Source Modification No.: 099-37399-00118

The Indiana Department of Environmental Management (IDEM) has received an application from Indiana Composites, LLC, located at 606 West Center St., Bourbon, IN 46504, for a Significant Source Modification and a Part 70 Operating Permit. If approved by IDEM's Office of Air Quality (OAQ), this proposed modification would allow Indiana Composites, LLC to construct and operate four (4) resin transfer moulding operations, four (4) gel coat booths, one (1) resin application booths, one (1) mold shop operation, one (1) final finish operation, and one (1) grinding room. The source also proposed to modify its existing mold preparation and cleanup operation, gel coat application operation, resin application operation, assembly operation, fiberglass grinding operation, woodworking operation by increasing the maximum throughput of each unit.

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

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

Bourbon Public Library
307 North Main St.
Bourbon, IN 46504

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 T099-37220-00118 and SSM 099-37399-00118 in all correspondence.

Comments should be sent to:

Adam Wheat
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for extension 3-8397
Or dial directly: (317) 233-8397
Fax: (317) 232-6749 attn: Adam Wheat
E-mail: awheat@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 Adam Wheat of my staff at the above address.



Nathan C. Bell, Section Chief
Permits Branch
Office of Air Quality



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Eric Rygaard
Indiana Composites, LLC
409 Growth Parkway
Angola, IN 46703

Re: 099-37399-00118
Significant Source Modification

Dear Mr. Rygaard:

Indiana Composites, LLC was issued Registration No. R099-36847-00118 on April 15, 2016 for a stationary plastic composite boat and RV parts production plant located at 606 West Center Rd, Bourbon, IN 46504. An application to modify the source was received on May 24, 2016. Pursuant to the provisions of 326 IAC 2-7-10.5, a Significant Source Modification is hereby approved as described in the attached Technical Support Document.

Pursuant to 326 IAC 2-7-10.5, the following emission units are approved for construction at the source:

- (a) Four (4) resin transfer moulding operations, identified as RTM2 through RTM5, approved in 2016 for construction, each with a maximum capacity of 1.0 units per hour, utilizing resin transfer injection molding application, using no control, and exhausting indoors. [40 CFR 63, Subpart WWWW]
- (b) Four (4) gel coat application operations, identified as GC2 through GC5, approved in 2016 for construction, each with a maximum capacity of 5.0 units per hour, utilizing high volume low pressure (HVLP) spray application, using dry filters for particulate control, and exhausting to stacks GC2S through GC5S. [40 CFR 63, Subpart WWWW]
- (c) One (1) resin application operation, identified as CG2, approved in 2016 for construction, with a maximum capacity of 10.0 units per hour, utilizing mechanical non-atomized application: Fluid Impingement Technology (FIT), using dry filters for particulate control, and exhausting to stack CG2S. [40 CFR 63, Subpart WWWW]
- (d) One (1) mold shop operation, identified as MS1, approved in 2016 for construction, with a maximum capacity of 0.10 units per hour, utilizing high volume low pressure (HVLP) spray application, using dry filters for particulate control, and exhausting to stack CG2S. [40 CFR 63, Subpart WWWW]
- (e) One (1) final finish operation, identified as FF1, approved in 2016 for construction, with a maximum capacity of 25.0 units per hour, utilizing hand application, using no controls, and exhausting indoors.
- (f) One (1) fiberglass grinding room, identified as GR2, approved in 2016 for construction, with a maximum capacity of 394.0 pounds of fiberglass per hour, using dry filters for particulate control, and exhausting indoors.

Pursuant to 326 IAC 2-7-10.5, the following emission units are approved for modification at the source:

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- (a) One (1) mold preparation and cleanup operation, identified as MP1, constructed in 2016, modified in 2016, with a maximum capacity of 0.25 units per hour, using hand application, using no controls, and exhausting indoors. [40 CFR 63, Subpart WWWW]
- (b) One (1) gel coat application operation, identified as GC1, constructed in 2016, modified in 2016, with a maximum capacity of 5.0 units per hour, using HVLP application, using dry filters for particulate control, and exhausting to stack GC1S. [40 CFR 63, Subpart WWWW]
- (c) One (1) resin application operation, identified as CG1, constructed in 2016, modified in 2016, with a maximum capacity of 10.0 unit per hour, using mechanical non-atomized application: Fluid Impingement Technology (FIT), using dry filters for particulate control, and exhausting to stack CG1S. [40 CFR 63, Subpart WWWW]
- (d) One (1) assembly operation, identified as AO1, constructed in 2016, modified in 2016, with a maximum capacity of 25.0 units per hour, using hand application of adhesive to plastic parts, using no controls, and exhausting indoors. [40 CFR 63, Subpart PPPP]
- (e) One (1) fiberglass grinding room, identified as GR1, constructed in 2016, modified in 2016, with a maximum capacity of 394.0 pounds of fiberglass per hour, using dry filters for particulate control, and exhausting indoors.
- (f) One (1) woodworking operation, identified as WW1, constructed in 2016, modified in 2016, with a maximum capacity of 25.0 tons of wood per hour, using no control, and exhausting indoors.

The following construction conditions are applicable to the proposed modification:

1. General Construction Conditions
The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).
2. This approval to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.
3. Effective Date of the Permit
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.
4. Commenced Construction
Pursuant to 326 IAC 2-1.1-9 and 326 IAC 2-7-10.5(j), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.
5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.
6. Approval to Construct
Pursuant to 326 IAC 2-7-10.5(h)(2), this Significant Source Modification authorizes the construction of the new and modified emission unit(s), when the Significant Source Modification has been issued.

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Pursuant to 326 IAC 2-7-10.5(m), the emission units constructed under this approval shall not be placed into operation prior to issuance of the source's Part 70 Operating Permit to incorporate the required operation conditions.

Pursuant to 326 IAC 2-7-12, operation of the new and modified emission unit(s) is not approved until the Significant Permit Modification has been issued. Operating conditions shall be incorporated into the Part 70 Operating Permit in lieu of a Significant Permit Modification in accordance with 326 IAC 2-7-10.5(m)(2) and 326 IAC 2-7-12 (Permit Modification).

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

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

If you have any questions on this matter, please contact Adam Wheat of my staff, OAQ, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana, 46204-2251, or call at (800) 451-6027, and ask for Adam Wheat or extension 3-8397 or dial (317) 233-8397.

Sincerely,

Nathan C. Bell, Section Chief
Permits Branch
Office of Air Quality

Attachments: Significant Source Modification and Technical Support Document

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



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Significant Source Modification to a Part 70 Source

OFFICE OF AIR QUALITY

**Indiana Composites, LLC
606 West Center St.
Bourbon, IN 46504**

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

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.

This permit also addresses certain new source review requirements for new and/or existing equipment and is intended to fulfill the new source review procedures pursuant to 326 IAC 2-7-10.5, applicable to those conditions.

Significant Source Modification No. 099-37399-00118	
Issued by: Nathan C. Bell, Section Chief, Permits Branch Office of Air Quality	Issuance Date:

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Attachment A: 40 CFR 63, Subpart WWWW, NESHAP: Reinforced Plastic Composites Production
Attachment B: 40 CFR 63, Subpart PPPP, NESHAP: Surface Coating of Plastic Parts and Products

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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 plastic composite boat and RV parts production plant.

Source Address:	606 West Center St., Bourbon, Indiana 46504
General Source Phone Number:	(574) 849 - 0317
SIC Code:	3714
County Location:	Marshall
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 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)][326 IAC 2-7-5(14)]

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

- (a) One (1) gel coat application operation, identified as GC1, constructed in 2016, modified in 2016, with a maximum capacity of 5.0 units per hour, using HVLP application, using dry filters for particulate control, and exhausting to stack GC1S. [40 CFR 63, Subpart WWWW]
- (b) Four (4) gel coat application operations, identified as GC2 through GC5, approved in 2016 for construction, with a maximum capacity of 5.0 units per hour, utilizing high volume low pressure (HVLP) spray application, using dry filters for particulate control, and exhausting to stacks GC2S through GC5S. [40 CFR 63, Subpart WWWW]
- (c) One (1) resin application operation, identified as CG1, constructed in 2016, modified in 2016, with a maximum capacity of 10.0 unit per hour, using mechanical non-atomized application: Fluid Impingement Technology (FIT), using dry filters for particulate control, and exhausting to stack CG1S. [40 CFR 63, Subpart WWWW]
- (d) One (1) resin application operation, identified as CG2, approved in 2016 for construction, with a maximum capacity of 10.0 units per hour, utilizing mechanical non-atomized application: Fluid Impingement Technology (FIT), using dry filters for particulate control, and exhausting to stack CG2S. [40 CFR 63, Subpart WWWW]
- (e) One (1) mold shop operation, identified as MS1, approved in 2016 for construction, with a maximum capacity of 0.10 units per hour, utilizing high volume low pressure (HVLP) spray application, using dry filters for particulate control, and exhausting to stack CG2S. [40 CFR 63, Subpart WWWW]
- (f) One (1) fiberglass grinding room, identified as GR1, constructed in 2016, modified in 2016, with a maximum capacity of 394.0 pounds of fiberglass per hour, using dry filters for particulate control, and exhausting indoors.

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- (g) One (1) fiberglass grinding room, identified as GR2, approved in 2016 for construction, with a maximum capacity of 394.0 pounds of fiberglass per hour, using dry filters for particulate control, and exhausting indoors.

A.3 Specifically Regulated Insignificant Activities
[326 IAC 2-7-1(21)][326 IAC 2-7-4(c)][326 IAC 2-7-5(14)]

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

- (a) One (1) resin transfer molding operation, identified as RTM1, constructed in 2016, with a maximum capacity of 1.0 unit per hour, using resin transfer injection molding application, using no controls, and exhausting indoors. [40 CFR 63, Subpart WWWW]
- (b) Four (4) resin transfer moulding operations, identified as RTM2 through RTM5, approved in 2016 for construction, with a maximum capacity of 1.0 units per hour, utilizing resin transfer injection molding application, using no control, and exhausting indoors. [40 CFR 63, Subpart WWWW]
- (c) One (1) assembly operation, identified as AO1, constructed in 2016, modified in 2016, with a maximum capacity of 25.0 units per hour, using hand application of adhesive to plastic parts, using no controls, and exhausting indoors. [40 CFR 63, Subpart PPPP]

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

This stationary source also includes the following insignificant activities which are not specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) One (1) mold preparation and cleanup operation, identified as MP1, constructed in 2016, modified in 2016, with a maximum capacity of 0.25 units per hour, using hand application, using no controls, and exhausting indoors.
- (b) One (1) final finish operation, identified as FF1, approved in 2016 for construction, with a maximum capacity of 25.0 units per hour, utilizing hand application, using no controls, and exhausting indoors.
- (c) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, not including any boilers, consisting of the following:
 - (1) Twenty-five (25) furnaces, identified as SH1 through SH25, each constructed in 2016, each with a maximum heat input capacity of 0.15 MMBtu per hour, each using no control, and each exhausting indoors.
 - (2) Three (3) air make up units, identified as AM1 through AM3, each constructed in 2016, each with a maximum heat input capacity of 1.0 MMBtu per hour, each using no control, and each exhausting indoors.
- (d) Two (2) MIG welding stations, identified as Weld1 and Weld2, each constructed in 2016, each with a maximum consumption of 0.25 pounds of electrode per hour, each using no controls, and each exhausting indoors.
- (e) One (1) woodworking operation, identified as WW1, constructed in 2016, modified in 2016, with a maximum capacity of 25.0 tons of wood per hour, using no control, and exhausting indoors.
- (f) Paved roads and parking lots.

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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).

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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 Revocation of Permits [326 IAC 2-1.1-9(5)]

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

B.3 Affidavit of Construction [326 IAC 2-5.1-3(h)] [326 IAC 2-5.1-4]

This document shall also become the approval to operate pursuant to 326 IAC 2-5.1-4 when prior to the start of operation, the following requirements are met:

- (a) The attached Affidavit of Construction shall be submitted to the Office of Air Quality (OAQ), verifying that the emission units were constructed as proposed in the application or the permit. The emission units covered in this permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM if constructed as proposed.
- (b) If actual construction of the emission units differs from the construction proposed in the application, the source may not begin operation until the permit has been revised pursuant to 326 IAC 2 and an Operation Permit Validation Letter is issued.
- (c) The Permittee shall attach the Operation Permit Validation Letter received from the Office of Air Quality (OAQ) to this permit.

B.4 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, T099-37220-00118, 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.5 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.6 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.

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B.7 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.8 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.9 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.10 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.11 Annual Compliance Certification [326 IAC 2-7-6(5)]

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

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

and

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

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

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

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

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

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

The Permittee shall implement the PMPs.

- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM,

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OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

B.13 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;

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- (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.14 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.

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- (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.15 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 T099-37220-00118 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised under 326 IAC 2-7-10.5, or
 - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this combined permit, all previous registrations and permits are superseded by this combined new source review and part 70 operating permit.

B.16 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.17 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

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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.18 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.

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B.19 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.20 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.21 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

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

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

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B.23 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.24 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.25 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.

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- (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.26 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.

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SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

C.2 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

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

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

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

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of

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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.

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

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

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

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

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

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

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

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

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

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

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

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

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

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

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

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

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:

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

no later than 180 days from the date on which this source commences operation.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

The statement must be submitted to:

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

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

C.17 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

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

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

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

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

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

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

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

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Proper notice submittal under Section B –Emergency Provisions

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

- (b) The address for report submittal is:

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

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) The first report shall cover the period commencing on the date of issuance of this permit or the date of initial start-up, whichever is later, and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit, "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

C.19 Compliance with 40 CFR 82 and 326 IAC 22-1

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

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SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) gel coat application operation, identified as GC1, constructed in 2016, modified in 2016, with a maximum capacity of 5.0 units per hour, using HVLP application, using dry filters for particulate control, and exhausting to stack GC1S. [40 CFR 63, Subpart WWWW]
- (b) Four (4) gel coat application operations, identified as GC2 through GC5, approved in 2016 for construction, with a maximum capacity of 5.0 units per hour, utilizing high volume low pressure (HVLP) spray application, using dry filters for particulate control, and exhausting to stacks GC2S through GC5S. [40 CFR 63, Subpart WWWW]
- (c) One (1) resin application operation, identified as CG1, constructed in 2016, modified in 2016, with a maximum capacity of 10.0 unit per hour, using mechanical non-atomized application: Fluid Impingement Technology (FIT), using dry filters for particulate control, and exhausting to stack CG1S. [40 CFR 63, Subpart WWWW]
- (d) One (1) resin application operation, identified as CG2, approved in 2016 for construction, with a maximum capacity of 10.0 units per hour, utilizing mechanical non-atomized application: Fluid Impingement Technology (FIT), using dry filters for particulate control, and exhausting to stack CG2S. [40 CFR 63, Subpart WWWW]
- (e) One (1) mold shop operation, identified as MS1, approved in 2016 for construction, with a maximum capacity of 0.10 units per hour, utilizing high volume low pressure (HVLP) spray application, using dry filters for particulate control, and exhausting to stack CG2S. [40 CFR 63, Subpart WWWW]

Specifically Regulated Insignificant Activities:

- (a) One (1) resin transfer molding operation, identified as RTM1, constructed in 2016, with a maximum capacity of 1.0 unit per hour, using resin transfer injection molding application, using no controls, and exhausting indoors. [40 CFR 63, Subpart WWWW]
- (b) Four (4) resin transfer moulding operations, identified as RTM2 through RTM5, approved in 2016 for construction, with a maximum capacity of 1.0 units per hour, utilizing resin transfer injection molding application, using no control, and exhausting indoors. [40 CFR 63, Subpart WWWW]

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

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

D.1.1 Particulate Emission Limitations [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from the gel coat application operations (GC1 through GC5) and mold shop operation (MS1) shall be controlled by a dry particulate filters, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

D.1.2 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 for the five (5) gel coat application operations (GC1 through GC5), two (2) resin application operations (CG1 and CG2), one (1) mold shop operation (MS1), and five (5) resin transfer molding operations (RTM1 through RTM5):

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- (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.

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

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

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

D.1.4 Particulate Control

In order to comply with condition D.1.1, the filters for particulate control shall be in operation and control emissions from gel coat application operations (GC1 through GC5) and mold shop operation (MS1) at all times that the facilities are in operation.

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

D.1.5 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the gel coat application operations (GC1 through GC5) and mold shop operation (MS1) stacks (GCS1 through GCS5, and MS1S, respectively) while

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one or more of the units are in operation. If a condition exists which should result in a response, the Permittee shall take a reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response required by this condition. Failure to take a reasonable response shall be considered a deviation from this permit.

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

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

D.1.6 Record Keeping Requirements

- (a) To document the compliance status with Condition D.1.5, the Permittee shall maintain a log of weekly overspray observations, as well as daily and monthly inspections.
- (b) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

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SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (f) One (1) fiberglass grinding room, identified as GR1, constructed in 2016, modified in 2016, with a maximum capacity of 394.0 pounds of fiberglass per hour, using dry filters for particulate control, and exhausting indoors.
- (g) One (1) fiberglass grinding room, identified as GR2, approved in 2016 for construction, with a maximum capacity of 394.0 pounds of fiberglass per hour, using dry filters for particulate control, and exhausting indoors.

(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 Emission Limitations [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the fiberglass grinding rooms (GR1 and GR2) shall each not exceed 1.38 pounds per hour when operating at a process weight rate of 394 pounds per hour.

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

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

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

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

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

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

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

D.2.3 Particulate Control

In order to comply with condition D.2.1, the filters for particulate control shall be in operation and control emissions from the two (2) fiberglass grinding rooms (GR1 and GR2) at all times that the facilities are in operation.

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SECTION E.1

NESHAP

Emissions Unit Description:

- (a) One (1) gel coat application operation, identified as GC1, constructed in 2016, modified in 2016, with a maximum capacity of 5.0 units per hour, using HVLP application, using dry filters for particulate control, and exhausting to stack GC1S. [40 CFR 63, Subpart WWWW]
- (b) Four (4) gel coat application operations, identified as GC2 through GC5, approved in 2016 for construction, with a maximum capacity of 5.0 units per hour, utilizing high volume low pressure (HVLP) spray application, using dry filters for particulate control, and exhausting to stacks GC2S through GC5S. [40 CFR 63, Subpart WWWW]
- (c) One (1) resin application operation, identified as CG1, constructed in 2016, modified in 2016, with a maximum capacity of 10.0 unit per hour, using mechanical non-atomized application: Fluid Impingement Technology (FIT), using dry filters for particulate control, and exhausting to stack CG1S. [40 CFR 63, Subpart WWWW]
- (d) One (1) resin application operation, identified as CG2, approved in 2016 for construction, with a maximum capacity of 10.0 units per hour, utilizing mechanical non-atomized application: Fluid Impingement Technology (FIT), using dry filters for particulate control, and exhausting to stack CG2S. [40 CFR 63, Subpart WWWW]
- (e) One (1) mold shop operation, identified as MS1, approved in 2016 for construction, with a maximum capacity of 0.10 units per hour, utilizing high volume low pressure (HVLP) spray application, using dry filters for particulate control, and exhausting to stack CG2S. [40 CFR 63, Subpart WWWW]

Specifically Regulated Insignificant Activities:

- (a) One (1) resin transfer molding operation, identified as RTM1, constructed in 2016, with a maximum capacity of 1.0 unit per hour, using resin transfer injection molding application, using no controls, and exhausting indoors. [40 CFR 63, Subpart WWWW]
- (b) Four (4) resin transfer moulding operations, identified as RTM2 through RTM5, approved in 2016 for construction, with a maximum capacity of 1.0 units per hour, utilizing resin transfer injection molding application, using no control, and exhausting indoors. [40 CFR 63, Subpart WWWW]

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

**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 unit(s) listed above, except as otherwise specified in 40 CFR Part 63, Subpart WWWW.

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- (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 Plastic 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
- (3) 40 CFR 63.5790
- (4) 40 CFR 63.5795
- (5) 40 CFR 63.5796
- (6) 40 CFR 63.5797
- (7) 40 CFR 63.5798
- (8) 40 CFR 63.5799 (a)
- (9) 40 CFR 63.5800
- (10) 40 CFR 63.5805
- (11) 40 CFR 63.5810
- (12) 40 CFR 63.5835 (a) and (c)
- (13) 40 CFR 63.5840
- (14) 40 CFR 63.5860 (a)
- (15) 40 CFR 63.5895 (b)(1), (b)(2), (b)(3), (b)(4), (c), and (d)
- (16) 40 CFR 63.5900 (a)(2), (a)(4), (b), (c), and (e)
- (17) 40 CFR 63.5905
- (18) 40 CFR 63.5910
- (19) 40 CFR 63.5915 (a)(1), (a)(2), (b), (c), and (e)
- (20) 40 CFR 63.5920
- (21) 40 CFR 63.5925
- (22) 40 CFR 63.5930
- (23) 40 CFR 63.5935
- (24) 40 CFR 63, Subpart WWWW, Table 1, 2, 3, 4, 7, 9, 13, 14, and 15

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SECTION E.2

NESHAP

Emissions Unit Description:

Specifically Regulated Insignificant Activities:

- (c) One (1) assembly operation, identified as AO1, constructed in 2016, modified in 2016, with a maximum capacity of 25.0 units per hour, using hand application of adhesive to plastic parts, using no controls, and exhausting indoors. [40 CFR 63, Subpart PPPP]

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

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

E.2.1 General Provisions Relating to 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 unit(s) listed above, except as otherwise specified in 40 CFR Part 63, Subpart PPPP.
- (b) Pursuant to 40 CFR 63.10, the Permittee shall submit all required notifications and reports to:

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

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

The Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart PPPP (included as Attachment B to the operating permit), which are incorporated by reference as 326 IAC 20-81, for the emission unit(s) listed above:

- (1) 40 CFR 63.4480
- (2) 40 CFR 63.4481 (a)(1), (a)(2), (b), (c), (d), and (e)
- (3) 40 CFR 63.4482
- (4) 40 CFR 63.4483 (a), (c)(1), (d)
- (5) 40 CFR 63.4490 (a)(1), and (c)(1)
- (6) 40 CFR 63.4491 (a) and (b)
- (7) 40 CFR 63.4492 (a)
- (8) 40 CFR 63.4493 (a)
- (9) 40 CFR 63.4500 (a)(1), (b)
- (10) 40 CFR 63.4501
- (11) 40 CFR 63.4510 (a), (b), (c)(1) through (7), (c)(8)(i), and (c)(8)(ii)
- (12) 40 CFR 63.4520 (a)(1) through (6)
- (13) 40 CFR 63.4530 (a), (b), (c)(1) through (3), (d), (e), (f), (g), and (h)
- (14) 40 CFR 63.4531
- (15) 40 CFR 63.4540
- (16) 40 CFR 63.4541
- (17) 40 CFR 63.4542
- (18) 40 CFR 63.4550
- (19) 40 CFR 63.4551

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- (20) 40 CFR 63.4552
- (21) 40 CFR 63.4580
- (22) 40 CFR 63.4581
- (23) 40 CFR 63, Subpart PPPP, Table 2, 3, and 4
- (24) 40 CFR 63, Subpart PPPP, Appendix A

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

Source Name: Indiana Composites, LLC
Source Address: 606 West Center St., Bourbon, Indiana 46504
Part 70 Permit No.: T099-37220-00118

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:

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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: Indiana Composites, LLC
Source Address: 606 West Center St., Bourbon, Indiana 46504
Part 70 Permit No.: T099-37220-00118

This form consists of 2 pages

Page 1 of 2

- | |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p><input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12)</p> <ul style="list-style-type: none">• The Permittee must notify the Office of Air Quality (OAQ), within four (4) daytime business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and• The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16. |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

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

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

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

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

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**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: Indiana Composites, LLC
Source Address: 606 West Center St., Bourbon, Indiana 46504
Part 70 Permit No.: T099-37220-00118

Months: _____ to _____ Year: _____

Page 1 of 2

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

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

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

Indiana Composites, LLC
606 West Center St.
Bourbon, Indiana 46504

Affidavit of Construction

I, _____, being duly sworn upon my oath, depose and say:
(Name of the Authorized Representative)

1. I live in _____ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.
2. I hold the position of _____ for _____.
(Title) (Company Name)
3. By virtue of my position with _____, I have personal
(Company Name)
knowledge of the representations contained in this affidavit and am authorized to make these representations on behalf of _____.
(Company Name)
4. I hereby certify that Indiana Composites, LLC 606 West Center St., Bourbon, Indiana 46504, completed construction of the stationary plastic composite boat and RV parts production plant on _____ in conformity with the requirements and intent of the construction permit application received by the Office of Air Quality on May 24, 2016 and as permitted pursuant to Significant Source Modification No.: 099-37399-00118, Plant ID No. 099-00118 issued on _____.
5. **Permittee, please cross out the following statement if it does not apply:** Additional (operations/facilities) were constructed/substituted as described in the attachment to this document and were not made in accordance with the construction permit.

Further Affiant said not.

I affirm under penalties of perjury that the representations contained in this affidavit are true, to the best of my information and belief.

Signature _____
Date _____

STATE OF INDIANA)
)SS

COUNTY OF _____)

Subscribed and sworn to me, a notary public in and for _____ County and State of Indiana
on this _____ day of _____, 20 _____. My Commission expires: _____.

Signature _____
Name _____ (typed or printed)

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

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

Source Description and Location

Source Name:	Indiana Composites, LLC
Source Location:	606 West Center St., Bourbon, IN 46504
County:	Marshall
SIC Code:	3714 (Motor Vehicle Parts and Accessories)
Operation Permit No.:	T099-37220-00118
Significant Source Modification No.:	099-37399-00118
Permit Reviewer:	Adam Wheat

The Indiana Department of Environmental Management (IDEM) has received an application from Indiana Composites, LLC, for a Significant Source Modification and transition to from a Registration to a Part 70 Operating Permit for their stationary plastic composite boat and RV parts production plant.

Background Information

On April 15, 2016, Indiana Composites, LLC was issued a Registration No. R099-36847-00118 for a stationary plastic composite boat and RV parts production plant. On May 24, 2016, IDEM OAQ received an application from Indiana Composites, LLC requesting approval to construct new emission units and modify existing equipment and to transition to from a Registration to a Part 70 Operating Permit. Indiana Composites, LLC indicated in the application that it has the opportunity to significantly expand its business to meet anticipated demand. On August 12, 2016, Indiana Composites, LLC provided the following additional background information:

1. All of the equipment listed in Registration R099-36847-00118 was constructed at the end of April 2016, according to the plans and specifications submitted to IDEM in the original application. The equipment listed in Registration R099-36847-00118 is currently operating at approximately 75% of its maximum capacity.
2. The application of gel coat is a bottleneck to the application of resin (chop booth). The addition of new gel coat booths will allow for an increase in the capacity of the existing chop booth. The facility will be adding more gel coat drum pumps to achieve an increase in the capacity of the existing gel coat booth. This will result in faster color changes by eliminating the time required to flush the pumps. Also, there will likely be a second gel coat gun added to reduce the time required for color change over, however it would be mutually exclusive to the existing gun. Therefore, although not clearly stated in the Title V Application, I would like each gel coat booth to be described with two (2) gel coat guns only one of which can be operated at a given time.
3. The exiting operation as permitted in Registration R099-36847-00118 was originally intended to construct parts solely for its parent company Indiana Marine Products (IMP). However, shortly after its startup, upon learning of the existence of the facility in early May of 2016, Indiana Composites was approached by several other companies requesting that they perform similar services for their companies. It is important to note that the other companies solicited work from Indiana Composites and not vice versa. Indiana Composites, LLC became aware of the need for a Title V Permit on May 13, 2016, and submitted a TV Permit Application on May 16, 2016 (received by IDEM OAQ on May 24, 2016).

Existing Approvals

The source has been operating under Registration No. R099-36847-00118, issued on April 15, 2016.

Due to this application, the source is transitioning from a Registration to a Part 70 permit.

County Attainment Status

The source is located in Marshall 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.

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

(a) Ozone Standards

Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to ozone. Marshall 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}

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

(c) Other Criteria Pollutants

Marshall County has been classified as attainment or unclassifiable in Indiana for all the 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 (1) 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 or National Emission Standard for Hazardous Air Pollutants 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.

Greenhouse Gas (GHG) Emissions

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 not

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.

Source Status - Existing Source

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

Process / Emission Unit	PM	PM ₁₀	PM _{2.5}	SO ₂	NO _x	VOC	CO	Single HAP*	Combined HAPs
Total for Source	19.29	19.43	19.43	0.02	2.90	10.4	2.43	8.43 (Styrene)	10.02
PSD Major Source Thresholds	250	250	250	250	250	250	250	NA	NA

- (a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no PSD regulated pollutant is emitted at a rate of two hundred fifty (250) tons per year or more and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1).
- (b) This existing source is a major source of HAPs, as defined in 40 CFR 63.2, because HAP emissions are equal to or greater than ten (10) tons per year for a single HAP. Therefore, this source is a major source under Section 112 of the Clean Air Act (CAA).
- (c) These emissions are based on the calculations contain in Appendix A of the TSD for Registration No. R099-36847-00118.

Background and Description of Permitted Emission Units

The Office of Air Quality (OAQ) has reviewed an application, submitted by Indiana Composites, LLC (received by IDEM OAQ on May 24, 2016), relating to construction and operation of four (4) resin transfer moulding operations (RTM2 through RTM5), four (4) gel coat booths (GC2 through GC5), one (1) resin application booths (CG2), one (1) mold shop operation (MS1), one (1) final finish operation (FF1), and one (1) grinding room (GR2). The source also applied to modify its existing mold preparation and cleanup operation (MP1), gel coat application operation (GC1), resin application operation (CG1), assembly operation (AO1), fiberglass grinding operation (GR1), woodworking operation (WW1) by increasing the maximum throughput of each unit.

The source consists of the following permitted emission units:

- (a) One (1) resin transfer molding operation, identified as RTM1, constructed in 2016, with a maximum capacity of 1.0 unit per hour, using resin transfer injection molding application, using no controls, and exhausting indoors. [40 CFR 63, Subpart WWWW]
- (b) One (1) mold preparation and cleanup operation, identified as MP1, constructed in 2016, modified in 2016, with a maximum capacity of 0.25 units per hour, using hand application, using no controls, and exhausting indoors. [40 CFR 63, Subpart WWWW]
- (c) One (1) gel coat application operation, identified as GC1, constructed in 2016, modified in 2016, with a maximum capacity of 5.0 units per hour, using HVLP application, using dry filters for particulate control, and exhausting to stack GC1S. [40 CFR 63, Subpart WWWW]

- (d) One (1) resin application operation, identified as CG1, constructed in 2016, modified in 2016, with a maximum capacity of 10.0 unit per hour, using mechanical non-atomized application: Fluid Impingement Technology (FIT), using dry filters for particulate control, and exhausting to stack CG1S. [40 CFR 63, Subpart WWWW]
- (e) One (1) assembly operation, identified as AO1, constructed in 2016, modified in 2016, with a maximum capacity of 25.0 units per hour, using hand application of adhesive to plastic parts, using no controls, and exhausting indoors. [40 CFR 63, Subpart PPPP]
- (f) One (1) fiberglass grinding room, identified as GR1, constructed in 2016, modified in 2016, with a maximum capacity of 394.0 pounds of fiberglass per hour, using dry filters for particulate control, and exhausting indoors.
- (g) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, not including any boilers, consisting of the following:
 - (1) Twenty-five (25) furnaces, identified as SH1 through SH25, each constructed in 2016, each with a maximum heat input capacity of 0.15 MMBtu per hour, each using no control, and each exhausting indoors.
 - (2) Three (3) air make up units, identified as AM1 through AM3, each constructed in 2016, each with a maximum heat input capacity of 1.0 MMBtu per hour, each using no control, and each exhausting indoors.
- (h) Two (2) MIG welding stations, identified as Weld1 and Weld2, each constructed in 2016, each with a maximum consumption of 0.25 pounds of electrode per hour, each using no controls, and each exhausting indoors.
- (i) One (1) woodworking operation, identified as WW1, constructed in 2016, modified in 2016, with a maximum capacity of 25.0 tons of wood per hour, using no control, and exhausting indoors.
- (j) Paved roads and parking lots.

Proposed Emission Units

The following is a list of the proposed new emission units and pollution control devices:

- (a) Four (4) resin transfer moulding operations, identified as RTM2 through RTM5, approved in 2016 for construction, each with a maximum capacity of 1.0 units per hour, utilizing resin transfer injection molding application, using no control, and exhausting indoors. [40 CFR 63, Subpart WWWW]
- (b) Four (4) gel coat application operations, identified as GC2 through GC5, approved in 2016 for construction, each with a maximum capacity of 5.0 units per hour, utilizing high volume low pressure (HVLP) spray application, using dry filters for particulate control, and exhausting to stacks GC2S through GC5S. [40 CFR 63, Subpart WWWW]
- (c) One (1) resin application operation, identified as CG2, approved in 2016 for construction, with a maximum capacity of 10.0 units per hour, utilizing mechanical non-atomized application: Fluid Impingement Technology (FIT), using dry filters for particulate control, and exhausting to stack CG2S. [40 CFR 63, Subpart WWWW]
- (d) One (1) mold shop operation, identified as MS1, approved in 2016 for construction, with a maximum capacity of 0.10 units per hour, utilizing high volume low pressure (HVLP) spray application, using dry filters for particulate control, and exhausting to stack CG2S. [40 CFR 63, Subpart WWWW]

- (e) One (1) final finish operation, identified as FF1, approved in 2016 for construction, with a maximum capacity of 25.0 units per hour, utilizing hand application, using no controls, and exhausting indoors.
- (f) One (1) fiberglass grinding room, identified as GR2, approved in 2016 for construction, with a maximum capacity of 394.0 pounds of fiberglass per hour, using dry filters for particulate control, and exhausting indoors.

Enforcement Issues

There are no pending enforcement actions related to this modification.

Emission Calculations

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

Permit Level Determination – Part 70 Modification to an Existing Source

Pursuant to 326 IAC 2-1.1-1(12), Potential to Emit is defined as “the maximum capacity of a stationary source or emission unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, IDEM, or the appropriate local air pollution control agency.”

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

Process / Emission Unit	PTE Before Controls of the New Emission Units (ton/year)								
	PM	PM ₁₀	PM _{2.5}	SO ₂	NO _x	VOC	CO	Single HAP	Combined HAPs
Resin Transfer Moulding Operations (RTM2 through RTM5)	-	-	-	-	-	3.83	-	3.78 (Styrene)	3.78
Gel Coat Booths (GC2 through GC5)	60.42	60.42	60.42	-	-	59.13	-	46.09 (Styrene)	59.04
Resin Application Booth (CG2)	-	-	-	-	-	29.03	-	28.79 (Styrene)	28.79
Mold Shop (MS1)	9.56	9.56	9.56	-	-	16.41	-	13.10 (Styrene)	16.35
Final Finish Operations (FF1)	-	-	-	-	-	7.44	-	-	-
Grinding Room (GR2)	13.14	13.14	13.14	-	-	-	-	-	-
Total:	83.12	83.12	83.12	-	-	115.9	-	91.76 (Styrene)	107.96

	PTE Change of the Modified Emission Units/Process (ton/year)								
	PM	PM₁₀	PM_{2.5}	SO₂	NO_x	VOC	CO	Single HAP	Combined HAPs
PTE Before Modification	6.06	6.06	6.06	-	-	8.82	-	7.49 (Styrene)	8.78
PTE After Modification	28.46	28.46	28.46	-	-	48.98	-	40.31 (Styrene)	46.40
PTE Increase From Modification	22.40	22.40	22.40	-	-	40.16	-	32.82 (Styrene)	37.62

Appendix A of this TSD reflects the potential emissions of the modification in detail.

	Total PTE Increase Due to the Modification (ton/year)								
	PM	PM₁₀	PM_{2.5}	SO₂	NO_x	VOC	CO	Single HAP	Combined HAPs
PTE of New Emission units	83.12	83.12	83.12	-	-	115.85	-	91.76 (Styrene)	107.96
PTE Increase of Modified Emission Units/Process	22.40	22.40	22.40	-	-	40.16	-	32.82 (Styrene)	37.62
Total PTE of the Modification	105.5	105.5	105.5	-	-	156.0	-	124.6 (Styrene)	145.6

Appendix A of this TSD reflects the potential emissions of the modification in detail.

(a) Approval to Construct

Pursuant to 326 IAC 2-7-10.5(g)(4), a Significant Source Modification is required because this modification has the potential to emit PM/PM10/direct PM2.5, and VOC greater than or equal to twenty-five (25) tons per year.

Pursuant to 326 IAC 2-7-10.5(g)(6), a Significant Source Modification is required because this modification has a potential to emit greater than or equal to ten (10) tons per year of a single HAP and twenty-five (25) tons per year of any combination of HAPs.

Permit Level Determination – Part 70 New Source

Pursuant to 326 IAC 2-7-1(30), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U.S. EPA.”

The following table is used to determine the appropriate permit level under 326 IAC 2-7. This table reflects the PTE after permit issuance.

Process / Emission Unit	Part 70: Unlimited PTE (tons/yr)								
	PM	PM ₁₀	PM _{2.5}	SO ₂	NO _x	VOC	CO	Single HAP*	Combined HAPs
Resin Transfer Molding Operation (RTM1 through RTM5)	-	-	-	-	-	4.79	-	4.73 (Styrene)	4.73
Gel Coat Application Booths (GC1 through GC5)	75.52	75.52	75.52	-	-	73.91	-	57.61 (Styrene)	73.80
Resin Application Booths (CG1 and CG2)	-	-	-	-	-	58.05	-	57.57 (Styrene)	57.57
Mold Shop (MS1)	9.56	9.56	9.56	-	-	16.41		13.10 (Styrene)	16.35
Mold Preparation and Cleanup Operation (MP1)	9.56	9.56	9.56	-	-	16.41		-	-
Assembly Operation (AO1)	-	-	-	-	-	2.86	-	2.86 (MMA)	2.86
Final Finish Operation (FF1)	-	-	-	-	-	0.23	-	-	-
Fiberglass Grinding Rooms (GR1 and GR2)	-	-	-	-	-	7.44	-	-	-
Natural Gas Combustion	26.28	26.28	26.28	-	-	-	-	0.05 (Hexane)	0.05
Welding (Weld 1 and Weld2)	0.06	0.22	0.22	0.02	2.90	0.16	2.43	0.01 (Manganese)	0.01
Miscellaneous Woodworking (WW1)	0.01	0.01	0.01	-	-	-	-	-	-
Paved Roads**	0.21	0.21	0.21	-	-	-	-	-	-
Total for Source	111.7	111.8	111.8	0.02	2.90	165.94	2.43	133.02 (Styrene)	155.37
Part 70 Threshold	NA	100	100	100	100	100	100	10	25

- (a) The potential to emit (as defined in 326 IAC 2-7-1(30)) of PM₁₀, PM_{2.5}, and VOC is equal to or greater than one hundred (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.
- (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 and will be issued a Part 70 Operating Permit.

Permit Level Determination – PSD

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

Process / Emission Unit	Project Emissions (ton/year)							
	PM	PM ₁₀	PM _{2.5} *	SO ₂	NO _x	VOC	CO	(Other) (Pb, Be, Hg, etc.)
PTE of New Emission units	83.12	83.12	83.12	-	-	115.85	-	-
PTE Increase of Modified Emission Units/Process	22.40	22.40	22.40	-	-	40.16	-	-
Total for Modification	105.5	105.5	105.5	-	-	156.0	-	-
PSD Major Source Thresholds	250	250	250	250	250	250	250	-

*PM_{2.5} listed is direct PM_{2.5}.

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

Federal Rule Applicability Determination

Due to the modification at this source, federal rule applicability has been reviewed as follows:

New Source Performance Standards (NSPS):

- (a) The requirements of the New Source Performance Standard, Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Dc (326 IAC 12), are not included in the permit, because each of the twenty-eight (28) natural gas-fired units, have maximum heat input capacities of less than ten (10) million British thermal units per hour, each, and are not steam generating units.
- (b) The requirements of the New Source Performance Standards (NSPS) for Surface Coating of Metal Furniture, 40 CFR 60, Subpart EE (326 IAC 12), are not included in the permit, since this source does not coat metal furniture as described in §60.310(a).
- (c) The requirements of the New Source Performance Standards (NSPS) for Automobile and Light Duty Truck Surface Coating Operations, 40 CFR 60, Subpart MM (326 IAC 12), are not included in the permit, since this source does not coat automobiles or light duty trucks as described in §60.390(a).
- (d) The requirements of the New Source Performance Standards (NSPS) for Pressure Sensitive Tape and Label Surface Coating Operations, 40 CFR 60, Subpart RR (326 IAC 12), are not included in the permit, since this source does not coat sensitive tape or label materials as described in §60.440(a).
- (e) The requirements of the New Source Performance Standards (NSPS) for Industrial Surface Coating: Large Appliances, 40 CFR 60.450, Subpart SS (326 IAC 12), are not included in the permit, since this source does not coat large appliances as described in §60.450(a).
- (f) The requirements of the New Source Performance Standards (NSPS) for Metal Coil Surface Coating, 40 CFR 60.460, Subpart TT (326 IAC 12), are not included in the permit, since this source does not coat metal coils as described in §60.460(a).
- (g) The requirements of the New Source Performance Standards (NSPS) for the Beverage Can Surface Coating Industry, 40 CFR 60.490, Subpart WW (326 IAC 12), are not included in the permit, since this source does not coat beverage cans as described in §60.490(a).

- (h) The requirements of the New Source Performance Standards (NSPS) for Magnetic Tape Coating Facilities, 40 CFR 60.710, Subpart SSS (326 IAC 12), are not included in the permit, since this source does not coat magnetic tape as defined in §60.711(a)(13).
- (i) The requirements of the New Source Performance Standards (NSPS) for Industrial Surface Coating: Surface Coating of Plastic Parts for Business Machines, 40 CFR 60.720, Subpart TTT (326 IAC 12), are not included in the permit, since this source does not coat plastic parts for business machines as defined in §60.721(a).
- (j) The requirements of the New Source Performance Standards for Spark Ignition Internal Combustion Engines, 40 CFR 60, Subpart JJJJ (326 IAC 12), are not included in the permit for the twenty-eight (28) natural gas-fired units, because they are each not reciprocating internal combustion engines.
- (k) There are no other New Source Performance Standards (40 CFR Part 60) and 326 IAC 12 included in the permit.

National Emission Standards for Hazardous Air Pollutants (NESHAP):

- (l) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Wood Furniture Manufacturing Operations, Subpart JJ (326 IAC 20-14) are not included in the permit, because this source does not manufacture wood furniture components as defined in 40 CFR 63.801.
- (m) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Automobiles and Light-Duty Trucks, 40 CFR 63, Subpart IIII (4I), (326 IAC 20-85), is not included in the permit, since this source does not coat automobile or light duty truck body parts.

In addition, pursuant to 63.3081(b)(1), this source is not subject to this rule, since the source meets all of the following criteria:

- (1) The coating operation is located at a plastic or composites molding facility;
 - (2) All of the body parts topcoated at the facility for use in new automobiles or new light-duty trucks are fabricated (molded, stamped, formed, etc.) at the facility or at another plastic or composites molding facility owned/operated by this source, and none of the new vehicles in which these body parts are used are assembled at the facility; and
 - (3) This source does not topcoat all of the body parts for any single new automobile or new light-duty truck at the facility.
- (n) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Metal Cans, 40 CFR 63, Subpart KKKK (326 IAC 20-86) are not included in the permit, since this source does not coat metal cans.
 - (o) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Miscellaneous Metal Parts and Products Surface Coating, 40 CFR 63, Subpart MMMM (326 IAC 20-80), are not included in the permit, since this source does not coat metal parts.
 - (p) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Large Appliances, 40 CFR 63, Subpart NNNN (326 IAC 20-63) are not included in the permit, since this source does not coat large appliances.
 - (q) The assembly operation (AO1) is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR 63, Subpart PPPP (Surface Coating of Plastic Parts and Products)

and 326 IAC 20-81, because it uses 100 gallons per year, or more, of coatings containing HAPs in the surface coating of plastic parts and products, and is located at a major source of HAPs.

The specific facility subject to this rule includes the following:

- (1) One (1) assembly operation, identified as AO1, constructed in 2016, modified in 2016, with a maximum capacity of 25.0 units per hour, using hand application of adhesive to plastic parts, using no controls, and exhausting indoors. [40 CFR 63, Subpart PPPP]

The assembly operation (AO1) is subject to the following portions of Subpart PPPP:

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

The requirements of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated as 326 IAC 20-1, apply to the assembly operation (AO1) except as otherwise specified in 40 CFR 63, Subpart PPPP.

Pursuant to 40 CFR 63.4481(c)(6), the resin transfer moulding operations (RTM1 through RTM5), gel coat application operations (GC1 through GC5), resin application operations (CG1 and CG2), and mold shop operation (MS1) are not subject to NESHAP, Subpart PPPP, since each unit is subject to NESHAP, Subpart WWWW

- (r) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Wood Building Products, 40 CFR 63, Subpart QQQQ (326 IAC 20-79), are not included in the permit, since this source does not coat wood building products.
- (s) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Metal Furniture, 40 CFR 63, Subpart RRRR (326 IAC 20-78), are not included in the permit, since this source does not coat metal furniture.
- (t) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Metal Coil, 40 CFR 63, Subpart SSSS (326 IAC 20-64), are not included in the permit, since this source does not coat metal coil.

- (u) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Boat Manufacturing, 40 CFR 63, Subpart VVVV (326 IAC 20-48) are not included in the permit, since although this source does manufacture reinforced plastic parts for boats, the source does not manufacture hulls or decks of boats from fiberglass or aluminum, or assemble boats from premanufactured hulls and decks, or builds molds to make fiberglass hulls or decks
- (v) This source is subject to the National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production (40 CFR 63.5780, Subpart WWWW), which is incorporated by reference as 326 IAC 20-56 because the source produces reinforced plastic composites and is a major source of HAPs.

The specific facilities subject to this rule include the following:

- (1) One (1) gel coat application operation, identified as GC1, constructed in 2016, with a maximum capacity of 2.0 units per hour, using HVLP application, using dry filters for particulate control, and exhausting to stack GC1S.
- (2) Four (4) gel coat application operations, identified as GC2 through GC5, approved in 2016 for construction, with a maximum capacity of 5.0 units per hour, utilizing high volume low pressure (HVLP) spray application, using dry filters for particulate control, and exhausting to stacks GC2S through GC5S.
- (3) One (1) resin application operation, identified as CG1, constructed in 2016, with a maximum capacity of 1.0 unit per hour, using mechanical non-atomized application: Fluid Impingement Technology (FIT), using dry filters for particulate control, and exhausting to stack CG1S.
- (4) One (1) resin application operation, identified as CG2, approved in 2016 for construction, with a maximum capacity of 10.0 units per hour, utilizing mechanical non-atomized application: Fluid Impingement Technology (FIT), using dry filters for particulate control, and exhausting to stack CG2S.
- (5) One (1) mold shop operation, identified as MS1, approved in 2016 for construction, with a maximum capacity of 0.10 units per hour, utilizing mechanical non-atomized application: Fluid Impingement Technology (FIT), using dry filters for particulate control, and exhausting to stack CG2S.
- (6) One (1) resin transfer molding operation, identified as RTM1, constructed in 2016, with a maximum capacity of 1.0 unit per hour, using resin transfer injection molding application, using no controls, and exhausting indoors.
- (7) Four (4) resin transfer moulding operations, identified as RTM2 through RTM5, approved in 2016 for construction, with a maximum capacity of 1.0 units per hour, utilizing resin transfer injection molding application, using no control, and exhausting indoors.

Under NESHAP WWWW, GC1 through GC5, CG1, CG2, MS1, and RTM1 through RTM5 are considered new affected sources.

The entire rule is included as Attachment A of the permit. These units are subject to the following portions of Subpart WWWW:

- (1) 40 CFR 63.5780
- (2) 40 CFR 63.5785
- (3) 40 CFR 63.5790
- (4) 40 CFR 63.5795
- (5) 40 CFR 63.5796
- (6) 40 CFR 63.5797

- (7) 40 CFR 63.5798
- (8) 40 CFR 63.5799 (a)
- (9) 40 CFR 63.5800
- (10) 40 CFR 63.5805
- (11) 40 CFR 63.5810
- (12) 40 CFR 63.5835 (a) and (c)
- (13) 40 CFR 63.5840
- (14) 40 CFR 63.5860 (a)
- (15) 40 CFR 63.5895 (b)(1), (b)(2), (b)(3), (b)(4), (c), and (d)
- (16) 40 CFR 63.5900 (a)(2), (a)(4), (b), (c), and (e)
- (17) 40 CFR 63.5905
- (18) 40 CFR 63.5910
- (19) 40 CFR 63.5915 (a)(1), (a)(2), (b), (c), and (e)
- (20) 40 CFR 63.5920
- (21) 40 CFR 63.5925
- (22) 40 CFR 63.5930
- (23) 40 CFR 63.5935
- (24) 40 CFR 63, Subpart WWWW, Table 1, 2, 3, 4, 7, 9, 13, 14, and 15

The requirements of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated as 326 IAC 20-1, apply to RTM1 through RTM5, GC1 through GC5, CG1, CG2, and MS1, except as otherwise specified in 40 CFR 63, Subpart WWWW.

Pursuant to 40 CFR 63.5790(c), the mold preparation and cleanup operation (MP1) is not subject to 40 CFR 63, Subpart WWWW, since it applies mold sealing and release agents and performs mold stripping and cleaning.

- (w) The requirements of the National Emission Standard for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63, Subpart DDDDD (326 IAC 20-95) are not included in the permit, because natural gas-fired combustion units are used to heat the interior of the source and do not meet the definition of a process heater, as defined by 40 CFR 60.7575.
- (x) The requirements of the National Emission Standards for Hazardous Air Pollutants for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR Part 63, Subpart HHHHHH, are not included in this permit because this source does not perform paint stripping using chemical strippers that contain methylene chloride in the removal of dried paint, perform spray application of coatings to mobile vehicles and mobile equipment, or perform spray application of a coating that contains chromium, lead, manganese, nickel, or cadmium to a plastic and/or metal substrate. The requirements of this rule are not included in the permit for the processes at this source as follows:
 - (1) The resin and gel coat materials applied to molds in the resin transfer molding operations (RTM1 through RTM5), mold preparation and cleanup operation (MP1), gel coat application booths (GC1 through GC5), resin application booths (CG1 and CG2), and mold shop operation (MS1), do not meet the definition of coating as defined in 40 CFR 63.11180, since the materials are not applied to the mold for decorative, protective, or functional purposes and the materials are considered in-mold coatings that are spray-applied in the manufacture of reinforced plastic composite parts. Once the plastic part has been manufactured, it is removed from the mold and the mold is reused to make another part.

Pursuant to 40 CFR 63.11180, "coating" means, for the purposes of 40 CFR Part 63, Subpart HHHHHH, a material spray-applied to a substrate for decorative, protective, or functional purposes. For the purposes of 40 CFR Part 63, Subpart HHHHHH, coating does not include the following materials:

- (1) Decorative, protective, or functional materials that consist only of protective oils for metal, acids, bases, or any combination of these substances.
 - (2) Paper film or plastic film that may be pre-coated with an adhesive by the film manufacturer.
 - (3) Adhesives, sealants, maskants, or caulking materials.
 - (4) Temporary protective coatings, lubricants, or surface preparation materials.
 - (5) In-mold coatings that are spray-applied in the manufacture of reinforced plastic composite parts.
- (2) The coatings that are hand applied to plastic parts in the assembly operation (AO1) and Final Finish Operation (FF1) are not spray applied.
- (y) The requirements of the National Emission Standard for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers Area Sources, 40 CFR 63, Subpart JJJJJJ, are not included in this permit, since each of the twenty-eight (28) natural gas-fired units, fire only natural gas are not considered boilers.
- (z) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) Area Source Standards for Nine Metal Fabrication and Finishing Source Categories, 40 CFR 63, Subpart XXXXXX, are not included in the permit, because the operations at this source fall under SIC code 3714 (NAICS Code: 336350), which is not one of the nine source categories listed in 40 CFR 63.11514 (see Federal Register, 73 FR 43000, July 23, 2008, for the list of NAICS codes for regulated source categories). This source does not perform metal fabrication or finishing. This source manufactures and coats plastic boat and RV parts.
- (aa) There are no other National Emission Standards for Hazardous Air Pollutants under 40 CFR 63, 326 IAC 14 and 326 IAC 20 included in the permit.

Compliance Assurance Monitoring (CAM):

- (bb) 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.
- (cc) Pursuant to 40 CFR 64.2(b)(1)(i), emission limitations or standards proposed after November 15, 1990 pursuant to a NSPS or NESHAP under Section 111 or 112 of the Clean Air Act are exempt from the requirements of CAM. Therefore, an evaluation was not conducted for any emission limitations or standards proposed after November 15, 1990 pursuant to a NSPS or NESHAP under Section 111 or 112 of the Clean Air Act.
- (dd) Pursuant to 40 CFR 64.2(b)(1)(iii), Acid Rain requirements pursuant to Sections 404, 405, 406, 407(a), 407(b), or 410 of the Clean Air Act are exempt emission limitations or standards. Therefore, CAM was not evaluated for emission limitations or standards for SO₂ and NO_x under the Acid Rain Program.
- (ee) Pursuant to 40 CFR 64.3(d), if a continuous emission monitoring system (CEMS) is required pursuant to other federal or state authority, the owner or operator shall use the CEMS to satisfy the requirements of CAM according to the criteria contained in 40 CFR 64.3(d).

The following table is used to identify the applicability of CAM to each existing emission unit and each emission limitation or standard for a specified pollutant based on the criteria specified under 40 CFR 64.2:

Emission Unit / Pollutant	Control Device	Applicable Emission Limitation	Uncontrolled PTE (tons/year)	Controlled PTE (tons/year)	CAM Applicable (Y/N)	Large Unit (Y/N)
GC1 through GC5** / PM*	Y	326 IAC 6-3-2	15.10	0.76	N ^A	N
MS1 / PM*	Y	326 IAC 6-3-2	9.56	0.48	N ^A	N
CG1 / PM	Y	None	0.00	0.00	N	N
CG2 / PM	Y	None	0.00	0.00	N	N
GR1/ PM*	Y	362 IAC 6-3-2	13.14	0.13	N ^A	N
GR2/ PM*	Y	362 IAC 6-3-2	13.14	0.13	N ^A	N
Uncontrolled PTE (tpy) and controlled PTE (tpy) are evaluated against the Major Source Threshold for each pollutant. Major Source Threshold for criteria pollutants (PM10, PM2.5, SO2, NOX, VOC and CO) is 100 tpy, for a single HAP ten (10) tpy, and for total HAPs twenty-five (25) tpy						
PM* Under 326 IAC 6-3-2. PM is limited as a surrogate for the Part 70 regulated pollutant, PM10. Therefore, uncontrolled PTE and controlled PTE reflect the emissions of PM10.						
** All booths are similar units and CAM analysis is for an individual booth, and not the collection of booths.						
N ^A CAM does not apply for PM because the uncontrolled PTE of PM is less than the major source threshold.						
Emission units without air pollution controls are not subject to CAM. Therefore, they are not listed.						

Based on this evaluation, the requirements of 40 CFR Part 64, CAM, are not applicable to any of the new or modified units as part of this new source construction permit.

State Rule Applicability Determination

State rule applicability for this source has been reviewed as follows:

326 IAC 2-2 (PSD) and 2-3 (Emission Offset)

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

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

The operation of gel coat application booths (GC1 through GC5), resin application booths (CG1 and CG2), and mold shop operation (MS1), will emit equal to or greater than ten (10) tons per year for a single HAP and equal to or greater than twenty-five (25) tons per year for a combination of HAPs. Therefore, 326 IAC 2-4.1 would apply to the each unit, however, pursuant to 326 IAC 2-4.1-1(b)(2), because these units are specifically regulated by NESHAP 40 CFR 63, Subpart WWWW, which was issued pursuant to Section 112(d), 112(h), or 112(j) of the CAA, these units are exempt from the requirements of 326 IAC 2-4.1.

326 IAC 2-6 (Emission Reporting)

Since this source is required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program, this source is subject to 326 IAC 2-6 (Emission Reporting). In accordance with the compliance schedule in 326 IAC 2-6-3, an emission statement must be submitted triennially. The first report is due no later than July 1, 2019, and subsequent reports are due every three (3) years thereafter. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

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

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

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

- (1) 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.
- (2) 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.

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 the source does not have potential fugitive particulate emissions greater than 25 tons per year. Therefore, 326 IAC 6-5 does not apply.

326 IAC 12 (New Source Performance Standards)

See Federal Rule Applicability Section of this TSD.

326 IAC 20 (Hazardous Air Pollutants)

See Federal Rule Applicability Section of this TSD.

Surface Coating, Mold Making, and Assembly Operations

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

- (a) Pursuant to 326 IAC 6-3-1(b)(8), the resin transfer molding operations (RTM1 through RTM5), mold preparation and cleanup operation (MP1), and resin application booths (CG1 and CG2), are each not subject to the requirements of 326 IAC 6-3-2, since each uses hand, resin transfer injection molding, or mechanical non-atomized application which does not emit particulate emissions (i.e., does not use spray application).
- (b) Pursuant to 326 IAC 6-3-1(b)(15), the gel coat application booths (GC1 through GC5) and mold shop operation (MS1) are subject to the requirements of 326 IAC 6-3-2, since each has a potential coating usage of greater than 5 gallons per day.

Pursuant to 326 IAC 6-3-2(d) (Particulate emission limitations, work practices, and control technologies), the gel coat application booths (GC1 through GC5) and mold shop operation (MS1) shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, and the Registrant shall operate the control device in accordance with manufacturer's specifications.

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

The provisions of 326 IAC 8-1-6 are applicable to new facilities as of January 1, 1980, that have potential emissions of twenty-five (25) tons per year or more of VOC, are located anywhere in the state, and are not otherwise regulated by another Article 8 rule, 326 IAC 20-48 (Emission Standards for Hazardous Air Pollutants for Boat Manufacturing), or 326 IAC 20-56 (Reinforced Plastic Composites Production).

- (a) The requirements of 326 IAC 8-1-6 are not applicable to the resin transfer molding operations (RTM1 through RTM5), mold preparation and cleanup operation (MP1), gel coat application booths (GC1 through GC5), mold shop operation (MS1), assembly operation (AO1), and final finish operation (FF1), since the unlimited VOC potential emissions from each are less than

twenty-five (25) tons per year and each is not otherwise regulated by another Article 8 rule or 326 IAC 20-56 (Reinforced Plastic Composites Production).

- (b) While the unlimited potential VOC emissions from the resin application booths (CG1 and CG2) is greater than twenty-five (25) tons per year, each unit is subject to 326 IAC 20-56 and is therefore exempt from the requirements of 326 IAC 8-1-6 (BACT).

326 IAC 8-2-2 (Automobile and Light Duty Truck Coating Operations)

Pursuant to 326 IAC 8-2-2, the resin transfer molding operations (RTM1 through RTM5), mold preparation and cleanup operation (MP1), gel coat application booths (GC1 through GC5), resin application booths (CG1 and CG2), mold shop operation (MS1), assembly operation (AO1), and final finish operation (FF1), are each not subject to the requirements of 326 IAC 8-2-2, because each is not considered an automobile and light duty truck surface coating operation.

Note: As explained in Section IV of the Control Techniques Guidelines for Automobile and Light-Duty Truck Assembly Coatings, EPA-453/R-08-006, U.S. Environmental Protection Agency, September 2008, the auto and light-duty truck assembly coatings product category under section 183(e) of the Clean Air Act (CAA) does not include coatings used at plastic or composites molding facilities as described in the Surface Coating of Automobiles and Light-Duty Trucks NESHAP (40 CFR part 63, subpart IIII). This Control Techniques Guidelines document can be found on internet at the following website:

http://www.epa.gov/airquality/ozonepollution/SIPToolkit/ctg_act/200809_voc_epa453_r-08-006_auto_ldtruck_assembly_coating.pdf

326 IAC 8-2-9 (Miscellaneous Metal and Plastic Parts Coating Operations)

Pursuant to 326 IAC 8-2-1(a)(4), this rule applies to facilities located in any county, constructed after July 1, 1990, which have actual emissions of greater than fifteen (15) pounds of VOC per day before add-on controls, and that perform surface coating of metal parts (and plastic parts in Lake County) as specified in 326 IAC 8-2-9(a) and (b). This source is not subject to the requirements, since it is located in Marshall County and does not include surface coating of metal parts. In addition, the operations at this source are not subject to the requirements of 326 IAC 8-2-9 as follows:

- (1) The application of mold preparation and cleanup materials (MP1) in metal molds is not subject to the requirements of 326 IAC 8-2-9, since metal molds are not considered a miscellaneous metal part under this rule. This determination is based on EPA's Control Techniques Guidelines (CTG) for Miscellaneous Metal and Plastic Parts Coatings, EPA 453/R-08-003 (2008) (used in the development and revision of 326 IAC 8-2-9) and was verified by EPA Region 5. The metal molds are part of the process and not the part being manufactured. The CTG document can be found on the internet at the following link:

http://www3.epa.gov/ttn/oarpg/t1/ctg/miscmetal_ctg093008.pdf

- (2) The resin transfer molding operations (RTM1 through RTM5), gel coat application booths (GC1 through GC5), and resin application booths (CG1 and CG2), do not involve the surface coating of metal parts. As defined by 326 IAC 8-1-0.5 (Definitions), "coating" means the application of protective, functional, or decorative films. The resin and gel coat materials applied to molds do not meet the definition of a coating, since the mold is not coated with a protective, functional, or decorative film. Once the plastic part has been manufactured, it is removed from the mold and the mold is reused to make another part.
- (3) The assembly operation (AO1), mold shop operation (MS1), and final finish operation (FF1) do not involve the surface coating of metal parts, but hand application of adhesive and finishing products to plastic parts.

326 IAC 8-10 (Automobile Refinishing)

Pursuant to 326 IAC 8-10, the resin transfer molding operations (RTM1 through RTM5), mold preparation and cleanup operation (MP1), gel coat application booths (GC1 through GC5), resin application booths (CG1 and CG2), mold shop operation (MS1), assembly operation (AO1), and final finish operation (FF1), are each not subject to the requirements of 326 IAC 8-10, because each does not perform refinishing of after-market motor vehicle parts and thus do not meet the definition of automobile refinishing under 326 IAC 8-10-2(5).

There are no other 326 IAC 8 Rules that are applicable to the resin transfer molding operations (RTM1 through RTM5), mold preparation and cleanup operation (MP1), gel coat application booths (GC1 through GC5), resin application booths (CG1 and CG2), mold shop operation (MS1), assembly operation (AO1), and final finish operation (FF1).

326 IAC 20-56 (Reinforced Plastic Composites Production)

Pursuant to 326 IAC 20-56-1, this rule applies to any source subject to the requirements of 40 CFR 63, Subpart WWWW, NESHAP for Reinforced Plastic Composites Production. Since resin transfer molding operations (RTM1 through RTM5), gel coat application booths (GC1 through GC5), resin application booths (CG1 and CG2), mold shop operation (MS1), are considered new affected units under NESHAP, Subpart WWWW, each unit is subject to the requirements of 326 IAC 20-56-2.

Pursuant to 326 IAC 20-56-2, 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 below are maintained, all personnel shall be given refresher training annually.
- (3) Personnel who have been trained by another owner or operator subject to this rule are exempt from subdivision (1) if written documentation that the employee's training is current is provided to the new employer.

The lesson plans shall cover, for the initial and refresher training, at a minimum, appropriate application techniques, appropriate equipment cleaning procedures, and appropriate equipment setup and adjustment to minimize material usage and overspray.

The owner or operator shall maintain a copy of the current training program, as well as a list of the following:

- (1) All current personnel, by name, that are required to be trained.
- (2) The date the person was trained or date of most recent refresher training, whichever is later.

Fiberglass Grinding Rooms

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

Pursuant to 326 IAC 6-3-1(14), the fiberglass grinding rooms (GR1 and GR2) controlled by dry filters is subject to the requirements of 326 IAC 6-3-2, since the potential to emit particulate emissions is greater than five hundred fifty-one thousandths (0.551) pound per hour. Pursuant to 326 IAC 6-3-2, the fiberglass grinding rooms (GR1 and GR2) shall each not exceed 1.38 pounds per hour, each, when operating at a process weight rate of 394 pounds per hour.

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

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

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

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

In order to comply with this limit, the dry filters for particulate control shall be in operation and control particulate emissions from the grinding rooms (GR1 and GR2) at all times that the fiberglass grinding rooms (GR1 and GR2) are in operation.

Welding

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

Pursuant to 326 IAC 6-3-1(b)(9), the welding operations (Weld1 and Weld2) are each not subject to the requirements of 326 IAC 6-3, because the potential electrode usage rate is less than six hundred twenty-five (625) pounds rod or wire per day.

Woodworking

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

Pursuant to 326 IAC 6-3-1(b)(14), the woodworking operations (WW1) are each not subject to the requirements of 326 IAC 6-3, because the potential to emit particulate matter are each less than five hundred fifty-one thousandths (0.551) pound per hour.

Natural Gas-Fired Units

326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating)

The twenty-eight (28) natural gas-fired units are each not subject to the requirements of this rule because each unit is not a source of indirect heating.

326 IAC 7-1.1 Sulfur Dioxide Emission Limitations

The twenty-eight (28) natural gas-fired units are each not subject to 326 IAC 326 IAC 7-1.1, because each has potential sulfur dioxide (SO₂) emissions of is less than 25 tons/year and 10 pounds/hour.

326 IAC 8-1-6 (VOC rules: General Reduction Requirements for New Facilities)

The twenty-eight (28) natural gas-fired units is not subject to 326 IAC 326 IAC 8-1-6, because each has potential VOC emissions of less than 25 tons/year.

Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-7 are required to assure 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.

(a) The Compliance Determination Requirements applicable to this modification are as follows:

- (1) The gel coat application operations (GC1 through GC5) and mold shop operation (MS1) have applicable compliance determination conditions as specified below:

In order to comply with 326 IAC 6-3, the filters for particulate control shall be in operation and control emissions from gel coat application operations (GC1 through GC5) and mold shop operation (MS1) at all times that the facilities are in operation.

- (2) The grinding rooms (GR1 and GR2) have applicable compliance determination conditions as specified below:

In order to comply with 326 IAC 6-3, the filters for particulate control shall be in operation and control emissions from the two (2) grinding rooms (GR1 and GR2) at all times that the facilities are in operation.

- (b) The Compliance Monitoring Requirements applicable to this proposed modification are as follows:

Emission Unit/Control	Operating Parameters	Frequency	Reason for compliance monitoring
GC1 through GC5 / Dry Filters	Filter inspection	Once per day	To ensure that the filters operate properly in order to comply with 326 IAC 6-3-2 and 326 IAC 2-7 (Part 70).
	Overspray Observation	Weekly	
	Overspray on the rooftops and the ground	Monthly	
MS1 / Dry Filters	Filter inspection	Once per day	To ensure that the filters operate properly in order to comply with 326 IAC 6-3-2 and 326 IAC 2-7 (Part 70).
	Overspray Observation	Weekly	
	Overspray on the rooftops and the ground	Monthly	

Conclusion and Recommendation

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 April 24, 2016.

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Source Modification No.099-37399-00118. The operation of this proposed modification shall be subject to the conditions of the attached Part 70 Operating Permit.

The staff recommends to the Commissioner that the Part 70 Significant Source Modification and Part 70 Operation Permit be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Adam Wheat 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) 233-8397 or toll free at 1-800-451-6027, extension 3-8397.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Permit Guide on the Internet at: <http://www.in.gov/idem/5881.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

**Appendix A: Emission Calculations
Emissions Summary of Modification**

Company Name: Indiana Composites, LLC
Source Address: 606 West Center Street, Bourbon, IN 46504
Part 70 Operating Permit No.: T099-37220-00118
Significant Source Modification: T099-37399-00118
Reviewer: Adam Wheat

Process	Potential to Emit of Modified Units Before Modification (tons/year)									
	PM*	PM ₁₀ *	PM _{2.5} *	SO ₂	NOx	VOC	CO	Total HAPs	Highest Single HAP (Styrene)	
Gel Coat Booth (GC1)	6.04	6.04	6.04	-	-	5.91	-	5.90	4.61	Styrene
Resin Booth (CG1)	0.00	0.00	0.00	-	-	2.90	-	2.88	2.88	Styrene
Mold Preparation and Cleanup Operation (MP1)	0.00	0.00	0.00	-	-	0.00	-	-	-	-
Assembly Operation (AO1)	0.00	0.00	0.00	-	-	0.00	-	0.00	0.23	MMA
Grinding Room (GR1)	0.00	0.00	0.00	-	-	-	-	-	-	-
Miscellaneous Woodworking (WW1)	0.01	0.01	0.01	-	-	-	-	-	-	-
Total PTE before modification:	6.06	6.06	6.06	0.00	0.00	8.82	0.00	8.78	7.49	Styrene

Process	Potential to Emit of Modified Units After Modification (tons/year)									
	PM*	PM ₁₀ *	PM _{2.5} *	SO ₂	NOx	VOC	CO	Total HAPs	Highest Single HAP (Styrene)	
Gel Coat Booth (GC1)	15.10	15.10	15.10	-	-	14.78	-	14.76	11.52	Styrene
Resin Booth (CG1)	-	-	-	-	-	29.03	-	28.79	28.79	Styrene
Mold Preparation and Cleanup Operation (MP1)	-	-	-	-	-	2.31	-	-	-	-
Assembly Operation (AO1)	-	-	-	-	-	2.86	-	2.86	2.86	MMA
Grinding Room (GR1)	13.14	13.14	13.14	-	-	-	-	-	-	-
Miscellaneous Woodworking (WW1)	0.21	0.21	0.21	-	-	-	-	-	-	-
Total PTE after modification:	28.46	28.46	28.46	0.00	0.00	48.98	0.00	46.40	40.31	Styrene

Process	Potential to Emit of New Units (tons/year)									
	PM*	PM ₁₀ *	PM _{2.5} *	SO ₂	NOx	VOC	CO	Total HAPs	Highest Single HAP (Styrene)	
Resin Transfer Moulding Operations (RTM2 through RTM5)	-	-	-	-	-	3.83	-	3.78	3.78	Styrene
Gel Coat Booths (GC2 through GC5)	60.42	60.42	60.42	-	-	59.13	-	59.04	46.09	Styrene
Resin Application Booth (CG2)	-	-	-	-	-	29.03	-	28.79	28.79	Styrene
Mold Shop (MS1)	9.56	9.56	9.56	-	-	16.41	-	16.35	13.10	Styrene
Final Finish Operations (FF1)	-	-	-	-	-	7.44	-	-	-	-
Grinding Room (GR2)	13.14	13.14	13.14	-	-	-	-	-	-	-
Total PTE of new units:	83.12	83.12	83.12	0.00	0.00	115.85	0.00	107.96	91.76	Styrene

Process	Unlimited Potential to Emit of Modification (tons/year)									
	PM*	PM ₁₀ *	PM _{2.5} *	SO ₂	NOx	VOC	CO	Total HAPs	Highest Single HAP (Styrene)	
PTE increase from modified units	22.40	22.40	22.40	0.00	0.00	40.16	0.00	37.62	32.82	Styrene
PTE from new units	83.12	83.12	83.12	0.00	0.00	115.85	0.00	107.96	91.76	Styrene
Total PTE of Modification:	105.5	105.5	105.5	0.00	0.00	156.0	0.00	145.6	124.6	Styrene

**Appendix A: Emission Calculations
Emissions Summary**

**Company Name: Indiana Composites, LLC
Source Address: 606 West Center Street, Bourbon, IN 46504
Part 70 Operating Permit No.: T099-37220-00118
Significant Source Modification: T099-37399-00118
Reviewer: Adam Wheat**

Unlimited/Uncontrolled PTE

Process	Potential to Emit (tons/year)									
	PM*	PM ₁₀ *	PM _{2.5} *	SO ₂	NOx	VOC	CO	Total HAPs	Highest Single HAP (Styrene)	
Gel Coat Application Booths (GC1 through GC5)	75.52	75.52	75.52	-	-	73.91	-	73.80	57.61	Styrene
Resin Application Booths (CG1 and CG2)	-	-	-	-	-	58.05	-	57.57	57.57	Styrene
Mold Shop (MS1)	9.56	9.56	9.56	-	-	16.41	-	16.35	13.10	Styrene
Fiberglass Grinding Rooms (GR1 and GR2)	26.28	26.28	26.28	-	-	-	-	-	-	-
Resin Transfer Molding Operation	-	-	-	-	-	4.79	-	4.73	4.73	Styrene
Assembly Operation (AO1)	-	-	-	-	-	2.86	-	2.86	2.86	MMA
Mold Preparation and Cleanup Operation (MP1)	-	-	-	-	-	2.31	-	-	-	-
Final Finish Operation (FF1)	-	-	-	-	-	7.44	-	-	-	-
Natural Gas Combustion	0.06	0.22	0.22	0.02	2.90	0.16	2.43	0.05	0.05	Hexane
Welding (Weld 1 and Weld2)	0.01	0.01	0.01	-	-	-	-	0.01	0.01	Manganese
Miscellaneous Woodworking (WW1)	0.21	0.21	0.21	-	-	-	-	-	-	-
Paved Roads**	0.03	0.01	0.002	-	-	-	-	-	-	-
Total:	111.67	111.81	111.81	0.02	2.90	165.94	2.43	155.37	133.02	Styrene

Controlled/Limited PTE

Process	Potential to Emit (tons/year)									
	PM*	PM ₁₀ *	PM _{2.5} *	SO ₂	NOx	VOC	CO	Total HAPs	Highest Single HAP (Styrene)	
Gel Coat Application Booths (GC1 through GC5)	3.78	3.78	3.78	-	-	73.91	-	73.80	57.61	Styrene
Resin Application Booths (CG1 and CG2)	-	-	-	-	-	58.05	-	57.57	57.57	Styrene
Mold Shop (MS1)	0.48	0.48	0.48	-	-	16.41	0.00	16.35	13.10	Styrene
Fiberglass Grinding Rooms (GR1 and GR2)	0.26	0.26	0.26	-	-	-	-	-	-	-
Resin Transfer Molding Operation (RTM) through RTMC	-	-	-	-	-	4.79	-	4.73	4.73	Styrene
Assembly Operation (AO1)	-	-	-	-	-	2.86	-	2.86	2.86	MMA
Mold Preparation and Cleanup Operation (MP1)	-	-	-	-	-	2.31	-	-	-	-
Final Finish Operation (FF1)	-	-	-	-	-	7.44	-	-	-	-
Natural Gas Combustion	0.06	0.22	0.22	0.02	2.90	0.16	2.43	0.05	0.05	Hexane
Welding (Weld 1 and Weld2)	0.01	0.01	0.01	-	-	-	-	0.01	0.01	Manganese
Miscellaneous Woodworking (WW1)	0.21	0.21	0.21	-	-	-	-	-	-	-
Paved Roads**	0.03	0.01	0.00	-	-	-	-	-	-	-
Total:	4.83	4.97	4.96	0.02	2.90	165.94	2.43	155.37	133.02	Styrene

*Pursuant to 326 IAC 6-3-2(d), the particulate emissions from the gel coat application booth shall be controlled by dry particulate filters and the Permittee shall operate the control device in accordance with the manufacturer's specifications. Compliance with this standard, in conjunction with a conservative assumption of 95% capture and control, shall limit PM, PM10, and PM2.5 emissions from the gel coat application booth to the values shown.

**The fugitive emissions of criteria pollutants and hazardous air pollutants are counted toward the determination of 326 IAC 2-5.1-2 (Registrations) applicability.

**Appendix A: Emission Calculations
VOC and Particulate
From Gel Coating Operations
Reinforced Plastics and Composites Fiberglass Processes
Gel Coat Application Booths (GC1 through GC5)**

**Company Name: Indiana Composites, LLC
Source Address: 606 West Center Street, Bourbon, IN 46504
Part 70 Operating Permit No.: T099-37220-00118
Significant Source Modification: T099-37399-00118
Reviewer: Adam Wheat**

PTE of a Single Gel Coat Application Booth - Mutually Exclusive Operations

Material	Density (Lb/Gal)	Weight % Styrene Monomer or VOC	Weight % MMA	Usage (gal/unit)	Maximum Production (unit/hour)	Maximum Usage (gal/day)	CFA Unified Emission Factor: VOC (lb/ton)*	CFA Unified Emission Factor: Styrene (lb/ton)*	CFA Unified Emission Factor: MMA (lb/ton)*	Potential VOC (lb/hr)	Potential VOC (lb/day)	Potential VOC (tons/yr)	Potential Styrene (tons/yr)	Potential MMA (tons/yr)	Potential Total HAP (tons/yr)	Potential Particulate (tons/yr)	Transfer Efficiency**
Tuscan Dune Gel Coat N-1626-LNHN	10.51	30.00%	5.00%	0.3750	5.00	45.00	342.00	267.0	75.00	3.37	80.87	14.76	11.52	3.24	14.76	15.10	75%
MEKP-925H	9.17	2.00%	0.00%	0.0056	5.00	0.68	40.00	0.00	0.00	0.005	0.12	0.02	0.00	0.00	0.00	0.00	75%
Subtotal PTE										3.37	81.00	14.78	11.52	3.24	14.76	15.10	

Particulate Control Efficiency 95%
Controlled Particulate Potential (tons/yr) 0.76

*Emission Factors were determined as follows:

Gel Coat: CFA Unified Emission Factor: Styrene (lb/ton) = 0.445 x %styrene x 2000; CFA Unified Emission Factor: MMA (lb/ton) = 75 lb/ton based on 5.00% MMA. (source: ACMA UEF-1-2011a, October 5, 2011 Revision)

Gel Coat: VOC emission factor = Styrene emission factor + MMA emission factor.

MEKP-925H: VOC emission factor = 2.00%/100% x 2000 lbs/ton = 40 lbs/ton

**Mechanical Atomized Application: HVLP

MMA = Methyl methacrylate (HAP)

Tooling Gel coat

Material	Density (Lb/Gal)	Weight % Styrene Monomer or VOC	Weight % MMA	Usage (gal/unit)	Maximum Production (unit/hour)	Maximum Usage (gal/day)	CFA Unified Emission Factor: VOC (lb/ton)*	CFA Unified Emission Factor: Styrene (lb/ton)*	CFA Unified Emission Factor: MMA (lb/ton)*	Potential VOC (lb/hr)	Potential VOC (lb/day)	Potential VOC (tons/yr)	Potential Styrene (tons/yr)	Potential MMA (tons/yr)	Potential Total HAP (tons/yr)	Potential Particulate (tons/yr)	Transfer Efficiency**
Lead Free Tooling Gel Coat	9.54	39.00%	3.00%	15.00	0.01	3.60	463.00	418.0	45.00	0.33	7.95	1.45	1.31	0.14	1.45	0.96	75%
MEKP-925H	9.17	2.00%	0.00%	0.23	0.01	0.05	40.00	0.00	0.00	0.0004	0.01	0.00	0.00	0.00	0.00	0.00	75%
Subtotal PTE										0.33	7.96	1.45	1.31	0.14	1.45	0.96	

Particulate Control Efficiency 95%
Controlled Particulate Potential (tons/yr) 0.05

*Emission Factors were determined as follows:

Gel Coat: CFA Unified Emission Factor: Styrene (lb/ton) = 418 lb/ton based on 39% styrene; CFA Unified Emission Factor: MMA (lb/ton) = 45 lb/ton based on 3.00% MMA. (source: ACMA UEF-1-2011a, October 5, 2011 Revision)

Gel Coat: VOC emission factor = Styrene emission factor + MMA emission factor.

MEKP-925H: VOC emission factor = 2.00%/100% x 2000 lbs/ton = 40 lbs/ton

**Mechanical Atomized Application: HVLP

MMA = Methyl methacrylate (HAP)

	Potential VOC (lb/hr)	Potential VOC (lb/day)	Potential VOC (tons/yr)	Potential Styrene (tons/yr)	Potential MMA (tons/yr)	Potential Total HAP (tons/yr)	Potential Particulate (tons/yr)
Potential to Emit (Worst Case Emissions) for a single booth:	3.37	81.00	14.78	11.52	3.24	14.76	15.10
							Particulate Control Efficiency 95%
							Controlled Particulate Potential (tons/yr) 0.76
Potential to Emit (Worst Case Emissions) for five booths:	16.87	404.99	73.91	57.61	16.18	73.80	75.52
							Particulate Control Efficiency 95%
							Controlled Particulate Potential (tons/yr) 3.78

Catalyst - All RPC Units

1,2-Methyl Ethyl Ketone Peroxide

Note 1: Source provided data that MEPK in the Catalyst does not decompose after being sprayed together with resin or gel coat. MEKP, DMP and Phlegmatizer (plasticizers) are immediately consumed by the resin to initiate the curing process, so no VOC is released.

Note 2: Catalyst is applied using either Mechanical Atomized Application for Gel Coat or Mechanical Non-Atomized Application for Resin.

Note 3: There are negligible VOC and particulate emissions from the catalyst. Catalyst contains no solids.

NOTES

Exclude catalyst emissions in HAP calculations

Acetone used as cleaning solvent

Methodology

Potential VOC (lb/hr) = [Density (lb/gal) * Usage (gal/unit) * Maximum Production (units/hr) ÷ 2,000 lb/ton] * Emission Factor: VOC (lb/ton)

Potential VOC (lbs/day) = Potential VOC (lb/hr) * 24 hr/day

Potential VOC (tons/yr) = Potential VOC (lb/hr) * 8,760 hr/yr ÷ 2,000 lb/ton

Potential Particulate (tons/yr) = Maximum Production (unit/hour) * Usage (gal/unit) * Density (lbs/gal) * (1 - Weight % VOC) * (1 - Transfer Efficiency) * 8760 hr/yr ÷ 2000 lb/ton

Potential Styrene and MMA (tons/yr) = [Density (lb/gal) * Usage (gal/unit) * Maximum Production (units/hr) ÷ 2,000 lb/ton] * Emission Factor: Styrene or MMA (lb/ton) * 8760 hr/yr ÷ 2000 lb/ton

**Appendix A: Emission Calculations
VOC and Particulate
From Resin Coating Operations
Reinforced Plastics and Composites Fiberglass Processes
Resin Application Booths (CG1 and CG2)**

**Company Name: Indiana Composites, LLC
Source Address: 606 West Center Street, Bourbon, IN 46504
Part 70 Operating Permit No.: T099-37220-00118
Significant Source Modification: T099-37399-00118
Reviewer: Adam Wheat**

PTE of a Single Resin Application Booth - Mutually Exclusive Operations

Production Resin																	
Material	Density (Lb/Gal)	Weight % Styrene Monomer or VOC	Weight % MMA	Usage (gal/unit)	Maximum Production (unit/hour)	Maximum Usage (gal/day)	CFA Unified Emission Factor: VOC (lb/ton)*	CFA Unified Emission Factor: Styrene (lb/ton)**	CFA Unified Emission Factor: MMA (lb/ton)***	Potential VOC (lb/hr)	Potential VOC (lb/day)	Potential VOC (tons/yr)	Potential Styrene (tons/yr)	Potential MMA (tons/yr)	Potential Total HAP (tons/yr)	Potential Particulate (tons/yr)	Transfer Efficiency****
Aropol L65305 T-22	9.19	33.17%	0.00%	2.00	10.00	480.00	71.51	71.51	0.00	6.57	157.73	28.79	28.79	0.00	28.79	0.00	100%
MEKP-925H	9.17	2.00%	0.00%	0.03	10.00	7.20	40.00	0.00	0.00	0.06	1.32	0.24	0.00	0.00	0.00	0.00	100%
Subtotal PTE										6.63	159.05	29.03	28.79	0.00	28.79	0.00	
Particulate Control Efficiency																95%	
Controlled Particulate Potential (tons/yr)																0.00	
*CFA Unified Emission Factor: VOC emission factor = Styrene emission factor + MMA emission factor. **CFA Unified Emission Factor: Styrene (lb/ton) linearly interpolated from table as follows: ((33.17-33)/(34-33)) * (74-71) + 71 = 71.51; ***CFA Unified Emission Factor: MMA (lb/ton) = 0 lb/ton based on 0% MMA. (source: ACMA UEF-1-2011a, October 5, 2011 Revision) ****Mechanical Non-Atomized Application: Fluid Impingement Technology (FIT) MMA = Methyl methacrylate (HAP)																	
Tooling Resin																	
Material	Density (Lb/Gal)	Weight % Styrene Monomer or VOC	Weight % MMA	Usage (gal/unit)	Maximum Production (unit/hour)	Maximum Usage (gal/day)	CFA Unified Emission Factor: VOC (lb/ton)*	CFA Unified Emission Factor: Styrene (lb/ton)**	CFA Unified Emission Factor: MMA (lb/ton)***	Potential VOC (lb/hr)	Potential VOC (lb/day)	Potential VOC (tons/yr)	Potential Styrene (tons/yr)	Potential MMA (tons/yr)	Potential Total HAP (tons/yr)	Potential Particulate (tons/yr)	Transfer Efficiency****
Stypol 040-8060 Tooling Resin	8.72	49.842%	3.187%	50.00	0.01	12.00	171.31	123.50	47.81	0.37	8.96	1.64	1.18	0.46	1.64	0.00	100%
MEKP-925H	9.17	2.00%	0.00%	0.75	0.01	0.18	40.00	0.00	0.00	0.0014	0.03	0.01	0.00	0.00	0.00	0.00	100%
Subtotal PTE										0.37	8.99	1.64	1.18	0.46	1.64	0.00	
Particulate Control Efficiency																95%	
Controlled Particulate Potential (tons/yr)																0.00	
*CFA Unified Emission Factor: VOC emission factor = Styrene emission factor + MMA emission factor. **CFA Unified Emission Factor: Styrene (lb/ton) linearly interpolated from table as follows: ((33.17-33)/(34-33)) * (74-71) + 71 = 71.51; ***CFA Unified Emission Factor: MMA (lb/ton) = 0 lb/ton based on 0% MMA. (source: ACMA UEF-1-2011a, October 5, 2011 Revision) MEKP-925H: VOC emission factor = 2.00%/100% x 2000 lbs/ton = 40 lbs/ton ****Mechanical Non-Atomized Application: Fluid Impingement Technology (FIT) MMA = Methyl methacrylate (HAP)																	
Potential to Emit (Worst Case Emissions) for a single booth:										Potential VOC (lb/hr)	Potential VOC (lb/day)	Potential VOC (tons/yr)	Potential Styrene (tons/yr)	Potential MMA (tons/yr)	Potential Total HAP (tons/yr)	Potential Particulate (tons/yr)	
Potential to Emit (Worst Case Emissions) for two booths:										6.63	159.05	29.03	28.79	0.46	28.79	0.00	
										13.25	318.11	58.05	57.57	0.91	57.57	0.00	

Catalyst - All RPC Units
^{1,2,3}Methyl Ethyl Ketone Peroxide

Note 1: Source provided data that MEPK in the Catalyst does not decompose after being sprayed together with resin or gel coat. MEKP, DMP and Phlegmatizer (plasticizers) are immediately consumed by the resin to initiate the curing process, so no VOC is released.
Note 2: Catalyst is applied using either Mechanical Atomized Application for Gel Coat or Mechanical Non-Atomized Application for Resin.
Note 3: There are negligible VOC and particulate emissions from the catalyst. Catalyst contains no solids.

NOTES

Exclude catalyst emissions in HAP calculations
Acetone used as cleaning solvent

Methodology

Potential VOC (lb/hr) = [Density (lb/gal) * Usage (gal/unit) * Maximum Production (units/hr) ÷ 2,000 lb/ton] * Emission Factor: VOC (lb/ton)
 Potential VOC (lbs/day) = Potential VOC (lb/hr) * 24 hr/day
 Potential VOC (tons/yr) = Potential VOC (lb/hr) * 8,760 hr/yr ÷ 2,000 lb/ton
 Potential Particulate (tons/yr) = Maximum Production (unit/hour) * Usage (gal/unit) * Density (lbs/gal) * (1 - Weight % VOC) * (1 - Transfer Efficiency) * 8760 hr/yr ÷ 2000 lb/ton
 Potential Styrene and MMA (tons/yr) = [Density (lb/gal) * Usage (gal/unit) * Maximum Production (units/hr) ÷ 2,000 lb/ton] * Emission Factor: Styrene or MMA (lb/ton) * 8760 hr/yr ÷ 2000 lb/ton

**Appendix A: Emission Calculations
VOC and Particulate
From Mold Shop Application Booth
Reinforced Plastics and Composites Fiberglass Processes
Mold Shop Application Booth (MS1)**

Company Name: Indiana Composites, LLC
Source Address: 606 West Center Street, Bourbon, IN 46504
Part 70 Operating Permit No.: T099-37220-00118
Significant Source Modification: T099-37399-00118
Reviewer: Adam Wheat

Mold Shop Application Booth (MS1) - Mutually Exclusive Operations

Production Resin																	
Material	Density (Lb/Gal)	Weight % Styrene Monomer or VOC	Weight % MMA	Usage (gal/unit)	Maximum Production (unit/hour)	Maximum Usage (gal/day)	CFA Unified Emission Factor: VOC (lb/ton)*	CFA Unified Emission Factor: Styrene (lb/ton)**	CFA Unified Emission Factor: MMA (lb/ton)***	Potential VOC (lb/hr)	Potential VOC (lb/day)	Potential VOC (tons/yr)	Potential Styrene (tons/yr)	Potential MMA (tons/yr)	Potential Total HAP (tons/yr)	Potential Particulate (tons/yr)	Transfer Efficiency****
Lead Free Tooling Gel Coat	9.54	39.00%	3.00%	15.00	0.10	36.00	463.00	418.00	45.00	3.31	79.51	14.51	13.10	1.41	14.51	9.56	75%
MEKP-925H	9.17	2.00%	0.00%	0.23	0.10	0.54	40.00	0.00	0.00	0.00	0.10	0.02	0.00	0.00	0.00	0.00	75%
Subtotal PTE										3.32	79.61	14.53	13.10	1.41	14.51	9.56	
Particulate Control Efficiency																95%	
Controlled Particulate Potential (tons/yr)																0.48	
*CFA Unified Emission Factor: VOC emission factor = Styrene emission factor + MMA emission factor. **CFA Unified Emission Factor: Styrene (lb/ton) linearly interpolated from table as follows: ((33.17-33)/(34-33)) * (74-71) + 71 = 71.51; ***CFA Unified Emission Factor: MMA (lb/ton) = 0 lb/ton based on 0% MMA. (source: ACMA UEF-1-2011a, October 5, 2011 Revision) ****Mechanical Non-Atomized Application: Fluid Impingement Technology (FIT) MMA = Methyl methacrylate (HAP)																	
Tooling Resin																	
Material	Density (Lb/Gal)	Weight % Styrene Monomer or VOC	Weight % MMA	Usage (gal/unit)	Maximum Production (unit/hour)	Maximum Usage (gal/day)	CFA Unified Emission Factor: VOC (lb/ton)*	CFA Unified Emission Factor: Styrene (lb/ton)**	CFA Unified Emission Factor: MMA (lb/ton)***	Potential VOC (lb/hr)	Potential VOC (lb/day)	Potential VOC (tons/yr)	Potential Styrene (tons/yr)	Potential MMA (tons/yr)	Potential Total HAP (tons/yr)	Potential Particulate (tons/yr)	Transfer Efficiency****
Stypol 040-8060 Tooling Resin	8.72	49.842%	3.187%	50.00	0.10	120.00	171.31	123.50	47.81	3.73	89.61	16.35	11.79	4.56	16.35	0.00	100%
MEKP-925H	9.17	2.00%	0.00%	0.75	0.10	1.80	40.00	0.00	0.00	0.0138	0.33	0.06	0.00	0.00	0.00	0.00	100%
Subtotal PTE										3.75	89.94	16.41	11.79	4.56	16.35	0.00	
Particulate Control Efficiency																95%	
Controlled Particulate Potential (tons/yr)																0.00	
*CFA Unified Emission Factor: VOC emission factor = Styrene emission factor + MMA emission factor. **CFA Unified Emission Factor: Styrene (lb/ton) linearly interpolated from table as follows: ((33.17-33)/(34-33)) * (74-71) + 71 = 71.51; ***CFA Unified Emission Factor: MMA (lb/ton) = 0 lb/ton based on 0% MMA. (source: ACMA UEF-1-2011a, October 5, 2011 Revision) MEKP-925H: VOC emission factor = 2.00%/100% x 2000 lbs/ton = 40 lbs/ton ****Mechanical Non-Atomized Application: Fluid Impingement Technology (FIT) MMA = Methyl methacrylate (HAP)																	
Potential to Emit (Worst Case Emissions):										Potential VOC (lb/hr)	Potential VOC (lb/day)	Potential VOC (tons/yr)	Potential Styrene (tons/yr)	Potential MMA (tons/yr)	Potential Total HAP (tons/yr)	Potential Particulate (tons/yr)	
										3.75	89.94	16.41	13.10	4.56	16.35	9.56	

Catalyst - All RPC Units

^{1,2}Methyl Ethyl Ketone Peroxide

- Note 1: Source provided data that MEKP in the Catalyst does not decompose after being sprayed together with resin or gel coat. MEKP, DMP and Phlegmatizer (plasticizers) are immediately consumed by the resin to initiate the curing process, so no VOC is released.
- Note 2: Catalyst is applied using either Mechanical Atomized Application for Gel Coat or Mechanical Non-Atomized Application for Resin.
- Note 3: There are negligible VOC and particulate emissions from the catalyst. Catalyst contains no solids.

NOTES

Exclude catalyst emissions in HAP calculations
Acetone used as cleaning solvent

Methodology

Potential VOC (lb/hr) = [Density (lb/gal) * Usage (gal/unit) * Maximum Production (units/hr) ÷ 2,000 lb/ton] * Emission Factor: VOC (lb/ton)
 Potential VOC (lbs/day) = Potential VOC (lb/hr) * 24 hr/day
 Potential VOC (tons/yr) = Potential VOC (lb/hr) * 8,760 hr/yr ÷ 2,000 lb/ton
 Potential Particulate (tons/yr) = Maximum Production (unit/hour) * Usage (gal/unit) * Density (lbs/gal) * (1 - Weight % VOC) * (1 - Transfer Efficiency) * 8760 hr/yr ÷ 2000 lb/ton
 Potential Styrene and MMA (tons/yr) = [Density (lb/gal) * Usage (gal/unit) * Maximum Production (units/hr) ÷ 2,000 lb/ton] * Emission Factor: Styrene or MMA (lb/ton) * 8760 hr/yr ÷ 2000 lb/ton

**Appendix A: Emission Calculations
Fiberglass Grinding Rooms with Handheld Grinders (GR1 and GR2)**

**Company Name: Indiana Composites, LLC
Source Address: 606 West Center Street, Bourbon, IN 46504
Part 70 Operating Permit No.: T099-37220-00118
Significant Source Modification: T099-37399-00118
Reviewer: Adam Wheat**

Process	Maximum Outlet Grain Loading (gr/acf)	Maximum Airflow Rate (acfm)	Controlled PTE (lbs/hr)	Controlled PTE (tons/yr)	Control Efficiency (%)	Uncontrolled PTE (lbs/hr)	Uncontrolled PTE (tons/yr)
Grinding Room GR1	0.001	3,500	0.03	0.13	99.0%	3.00	13.14
Grinding Room GR2	0.001	3,500	0.03	0.13	99.0%	3.00	13.14
Total:			0.06	0.26		6.00	26.28

METHODOLOGY

Controlled PTE (lbs/hr) = Maximum Outlet Grain Loading (gr/acf) * Maximum Airflow Rate (acfm) * 60 (min/hr) / 7000 (gr/lb)

Controlled PTE (tons/yr) = Controlled PTE (lbs/hr) * 8760 (hrs/yr) / 2000 (lbs/ton)

Uncontrolled PTE (lbs/hr) = Controlled PTE (lbs/hr) / (1 - Control Efficiency (%))

Uncontrolled PTE (tons/yr) = Uncontrolled PTE (lbs/hr) * 8760 (hrs/yr) / 2000 (lbs/ton)

326 IAC 6-3-2 Limitation

Process	Uncontrolled PTE of PM (lbs/hr)	PTE of PM After Controls (lbs/hr)	Subject to 326 IAC 6-3-2?	Maximum Process Weight (tons/hr)	326 IAC 6-3-2 Allowable Particulate Emission Rate (lbs/hr)	Is a Control Device Needed to Comply with 326 IAC 6-3-2?
Grinding Room GR1	3.00	0.03	Yes	0.197	1.38	Yes
Grinding Room GR2	3.00	0.03	Yes	0.197	1.38	Yes

Allowable emissions under 326 IAC 6-3-2 are calculated using the equation where the process weight rate is up to sixty thousand (60,000) pounds per hour:

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

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

**Appendix A: Emission Calculations
VOC and Particulate
Resin Transfer Molding Operations (RTM1 through RTM5)**

**Company Name: Indiana Composites, LLC
Source Address: 606 West Center Street, Bourbon, IN 46504
Part 70 Operating Permit No.: T099-37220-00118
Significant Source Modification: T099-37399-00118
Reviewer: Adam Wheat**

VOC and Particulate

Unit	Material ^{1,6}	Density (lbs/gal)	Weight % VOC	Max. Production Rate (unit/hr)	Max Material Usage (gal/unit)	Max Material Usage (gal/day)	Max Material Usage (lbs/hr)	VOC Emission Factor (% by weight) ²	PTE of VOC (lbs/hour)	PTE of VOC (ton/yr)	PTE of PM/PM10/PM2.5 before Controls (tons/yr) ³	Transfer Efficiency ⁴	PM/PM10/PM2.5 Control Efficiency ⁵	PTE of PM/PM10/PM2.5 after Controls (ton/yr)
RTM1	Aropol Q67709 INF-16	9.00	40.50%	1.00	2.00	48.00	18.00	3%	0.22	0.96	0.00	100%	0%	0.00
RTM1	MEKP - 925H	9.17	2.00%	1.00	0.03	0.72	0.28	3%	0.0002	0.001	0.00	100%	0%	0.00
RTM2	Aropol Q67709 INF-16	9.00	40.50%	1.00	2.00	48.00	18.00	3%	0.22	0.96	0.00	100%	0%	0.00
RTM2	MEKP - 925H	9.17	2.00%	1.00	0.03	0.72	0.28	3%	0.0002	0.001	0.00	100%	0%	0.00
RTM3	Aropol Q67709 INF-16	9.00	40.50%	1.00	2.00	48.00	18.00	3%	0.22	0.96	0.00	100%	0%	0.00
RTM3	MEKP - 925H	9.17	2.00%	1.00	0.03	0.72	0.28	3%	0.0002	0.001	0.00	100%	0%	0.00
RTM4	Aropol Q67709 INF-16	9.00	40.50%	1.00	2.00	48.00	18.00	3%	0.22	0.96	0.00	100%	0%	0.00
RTM4	MEKP - 925H	9.17	2.00%	1.00	0.03	0.72	0.28	3%	0.0002	0.001	0.00	100%	0%	0.00
RTM5	Aropol Q67709 INF-16	9.00	40.50%	1.00	2.00	48.00	18.00	3%	0.22	0.96	0.00	100%	0%	0.00
RTM5	MEKP - 925H	9.17	2.00%	1.00	0.03	0.72	0.28	3%	0.0002	0.001	0.00	100%	0%	0.00
Total										1.09	4.79	0.00		0.00

- 1 This unit uses production resin.
- 2 The emission factor is for weight percent of starting monomer emitted for Closed Molding Operations. (AP-42 ch. 4.4-2)
- 3 Assume PM = PM10 = PM2.5
- 4 The transfer efficiency is based upon resin transfer injection molding.
- 5 The PM/PM10/PM2.5 control efficiency includes 100% capture efficiency with no controls.
- 6 Acetone used as cleanup solvent. It is not considered a VOC or HAP.
Application method is Resin Transfer Molding

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) * Weight % VOC * emission Factor (%)
 PTE of VOC (tons/yr) = Max. Usage (lbs/hr) * Weight % VOC * emission Factor (%) * 8760 hr/yr * 1 ton/ 2000 lbs
 PTE of PM/PM10 before Controls (tons/yr) = Max Usage (lbs/hr) * (1-Weight % VOC) * (1-Transfer Efficiency) * 8760 hrs/yr * (1 ton/2000 lbs)
 PTE of PM/PM10 after Controls (tons/yr) = Max Usage (lbs/hr) * (1-Weight % VOC) * (1-Control Efficiency) * 8760 hrs/yr * (1 ton/2000 lbs)

Hazardous Air Pollutants (HAPs)

Unit	Material ¹	Density (lbs/gal)	Max. Production Rate (unit/hr)	Max Material Usage (gal/unit)	Max Material Usage (lbs/hr)	Emission Factor ²	Weight % Styrene	PTE Styrene (tons/yr)	Total HAPs (tons/yr)
RTM1	Aropol Q67709 INF-16	9.00	1.00	2.00	18.00	3%	40.00%	0.95	0.95
RTM2	Aropol Q67709 INF-16	9.00	1.00	2.00	18.00	3%	40.00%	0.95	0.95
RTM3	Aropol Q67709 INF-16	9.00	1.00	2.00	18.00	3%	40.00%	0.95	0.95
RTM4	Aropol Q67709 INF-16	9.00	1.00	2.00	18.00	3%	40.00%	0.95	0.95
RTM5	Aropol Q67709 INF-16	9.00	1.00	2.00	18.00	3%	40.00%	0.95	0.95
Total PTE for 5 booths:								4.73	4.73

- Application method is Resin Transfer Molding
- 1 This unit applies production resin.
- 2 The emission factor is for weight percent of starting monomer emitted for Closed Molding Operations. (AP-42 ch. 4.4-2)

Methodology

Max. usage (lbs/hr) = Max. Production Rate (unit/hr) * Max. Coating Usage (gal/unit) * Density (lbs/gal)
 PTE of VOC (tons/yr) = Max. Usage (lbs/hr) * Weight % HAP * emission Factor (%) * 8760 hr/yr * 1 ton/ 2000 lbs

Catalyst - All RPC Units
^{1,2,3} Methyl Ethyl Ketone Peroxide

Note 1: Source provided data that MEPK in the Catalyst does not decompose after being sprayed together with resin or gelcoat. MEKP, DMP and Phlegmatizer (plasticizers) are immediately consumed by the resin to initiate the curing process, so no VOC is released.

Note 2: Catalyst is applied using Resin Transfer Molding with a transfer efficiency of 100%.

Note 3: There are negligible VOC and particulate emissions from the catalyst. Catalyst contains no solids.

**Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations - Assembly Operation (AO1)**

**Company Name: Indiana Composites, LLC
Source Address: 606 West Center Street, Bourbon, IN 46504
Part 70 Operating Permit No.: T099-37220-00118
Significant Source Modification: T099-37399-00118
Reviewer: Adam Wheat**

VOC and Particulate

Material	Density (lb/gal)	Weight % Volatile (H ₂ O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (Solids)	Material Usage (gal/unit)	Maximum Production (units/hr)	Maximum Usage (gal/day)	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	Potential Particulate (tons/yr)	lb VOC/gal solids	Transfer Efficiency*
SCIGrip SG300-05	8.92	4.68%	0.00%	4.68%	0.00%	94.47%	0.0625	25.00	37.50	0.42	0.42	0.65	15.65	2.86	0.00	0.44	100%
Acetone	6.61	100.00%	100.00%	0.00%	100.00%	0.00%	0.0250	25.00	15.00	NA	0.00	0.00	0.00	0.00	0.00	NA	100%
Total									52.500			0.65	15.65	2.86	0.00		

Hazardous Air Pollutants (HAPs)

Material	Density (lb/gal)	Material Usage (gal/unit)	Maximum Production (units/hr)	Weight % MMA	MMA Emissions (tons/yr)	Total HAP Emissions (tons/yr)
SCIGrip SG300-05	8.92	0.0625	25.00	4.68%	2.86	2.86
Acetone	6.61	0.0250	25.00	0.00%	0.00	0.00
Total					2.86	2.86

Methodology

*Transfer Efficiency = 100% as Hand Application
Pounds of VOC per Gallon of Coating less Water (lb/gal) = Density (lb/gal) * Weight % Organics ÷ (1 - Volume % Water)
Pounds of VOC per Gallon of Coating (lb/gal) = Density (lb/gal) * Weight % Organics
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Material Usage (gal/unit) * Maximum Production (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Hour (lb/hr) * 24 hr/day
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/hr) * 8760 hr/yr ÷ 2000 lb/ton
Potential Particulate (tons/yr) = Maximum Production (units/hr) * Material Usage (gal/unit) * Density (lb/gal) * (1 - Weight % Volatiles) * (1 - Transfer Efficiency) * 8760 hr/yr ÷ 2000 lb/ton
Pounds VOC per Gallon of Solids = Density (lb/gal) * Weight % Organics ÷ Volume % Solids
MMA/Total HAP Emissions (tons/yr) = Density (lb/gal) * Material Usage (gal/unit) * Maximum Production (units/hr) * Weight % HAP * 8760 hrs/yr ÷ 2000 lb/ton
MMA = Methyl Methacrylate
MMA is a reactive monomer and therefore its emissions are equal to the total VOC content and emissions as applied

**Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations - Mold Preparation and Cleanup Operation (MP1)**

**Company Name: Indiana Composites, LLC
Source Address: 606 West Center Street, Bourbon, IN 46504
Part 70 Operating Permit No.: T099-37220-00118
Significant Source Modification: T099-37399-00118
Reviewer: Adam Wheat**

Mold Preparation and Cleanup Operations (MP1)

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Maximum (gal/day)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC (lb/hr)	Potential VOC (lb/day)	Potential VOC (ton/yr)	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency*
Freekote Mold Release 548965	6.05	99.80%	0.00%	99.80%	0.00%	2.61%	0.25	0.25	1.50	6.04	6.04	0.38	9.06	1.65	0.00	231.34	100%
Partall Film #10	8.17	29.42%	0.00%	29.42%	0.00%	67.35%	0.25	0.25	1.50	2.40	2.40	0.15	3.60	0.66	0.00	3.57	100%
Total									3.00			0.53	12.66	2.31	0.00		

Methodology

*Transfer Efficiency is 100% for Hand Applied Materials.

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)

Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)

Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) * (8760 hrs/yr) * (1 ton/2000 lbs)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)

This portion of the process does not use hazardous air pollutants. Acetone is the solvent used however it is not considered a VOC or HAP.

**Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations - Final Finish Operation (FF1)**

**Company Name: Indiana Composites, LLC
Source Address: 606 West Center Street, Bourbon, IN 46504
Part 70 Operating Permit No.: T099-37220-00118
Significant Source Modification: T099-37399-00118
Reviewer: Adam Wheat**

VOC and Particulate

Material	Density (lb/gal)	Weight % Volatile (H ₂ O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (Solids)	Material Usage (gal/unit)	Maximum Production (units/hr)	Maximum Usage (gal/day)	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	Potential Particulate (tons/yr)	lb VOC/gal solids	Transfer Efficiency*
Prefect II Extra Cut Compound	9.06	77.50%	62.50%	15.00%	67.90%	15.81%	0.0500	25.00	30.00	4.23	1.36	1.70	40.77	7.44	0.00	8.60	100%
Acetone	6.61	100.00%	100.00%	0.00%	100.00%	0.00%	0.0250	25.00	15.00	NA	0.00	0.00	0.00	0.00	0.00	NA	100%
Total								45.00				1.70	40.77	7.44	0.00		

Methodology

*Transfer Efficiency = 100% as Hand Application

Pounds of VOC per Gallon of Coating less Water (lb/gal) = Density (lb/gal) * Weight % Organics ÷ (1 - Volume % Water)

Pounds of VOC per Gallon of Coating (lb/gal) = Density (lb/gal) * Weight % Organics

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Material Usage (gal/unit) * Maximum Production (units/hr)

Potential VOC Pounds per Day = Pounds of VOC per Hour (lb/hr) * 24 hr/day

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/hr) * 8760 hr/yr ÷ 2000 lb/ton

Potential Particulate (tons/yr) = Maximum Production (units/hr) * Material Usage (gal/unit) * Density (lb/gal) * (1 - Weight % Volatiles) * (1 - Transfer Efficiency) * 8760 hr/yr ÷ 2000 lb/ton

Pounds VOC per Gallon of Solids = Density (lb/gal) * Weight % Organics ÷ Volume % Solids

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

**Company Name: Indiana Composites, LLC
Source Address: 606 West Center Street, Bourbon, IN 46504
Part 70 Operating Permit No.: T099-37220-00118
Significant Source Modification: T099-37399-00118
Reviewer: Adam Wheat**

Unit	Capacity (MMBtu/hr)	of Units	Input	Heat Input Capacity MMBtu/hr	HHV mmBtu	Potential Throughput MMCF/yr
					mmscf	
Lenox Furnaces (SH1-SH25)	0.15	25	3.75	6.75	1020	58.0
Air Makeup Unit (AM1-AM3)	1.00	3	3.00			
Total			6.75			

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100	5.5	84
Potential Emission in tons/yr	0.06	0.22	0.22	0.02	**see below	0.16	2.43

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

Methodology

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

Hazardous Air Pollutants (HAPs)

	HAPs - Organics					Total - Organics
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	
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	6.1E-05	3.5E-05	2.2E-03	0.05	9.9E-05	0.05

	HAPs - Metals					Total - Metals
	Lead	Cadmium	Chromium	Manganese	Nickel	
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/yr	1.4E-05	3.2E-05	4.1E-05	1.1E-05	6.1E-05	1.6E-04
					Total HAPs	0.05
					Worst HAP	0.05

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.

**Appendix A: Emissions Calculations
Welding and Thermal Cutting**

Company Name: Indiana Composites, LLC
Source Address: 606 West Center Street, Bourbon, IN 46504
Part 70 Operating Permit No.: T099-37220-00118
Significant Source Modification: T099-37399-00118
Reviewer: Adam Wheat

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)	Max. electrode consumption per station (lbs/day)	EMISSION FACTORS* (lb pollutant/lb electrode)				EMISSIONS (lbs/hr)				HAPS (lbs/hr)	
				PM/PM10/PM2.5	Mn	Ni	Cr	PM/PM10/PM2.5	Mn	Ni	Cr		
WELDING													
Submerged Arc				0.036	0.011			0.000	0.000	0.000		0	0.000
Metal Inert Gas (MIG)(E70S)	2	0.25	6.00	0.0052	0.00318	0.00001	0.00001	0.003	0.002	0.00001	0.000005		0.002
Stick (E7018 electrode)				0.0211	0.0009			0.000	0.000	0.000		0	0.000
Tungsten Inert Gas (TIG)(carbon steel)				0.0055	0.0005			0.000	0.000	0.000		0	0.000
Oxyacetylene(carbon steel)				0.0055	0.0005			0.000	0.000	0.000		0	0.000
FLAME CUTTING	Number of Stations	Max. Metal Thickness Cut (in.)	Max. Metal Cutting Rate (in./minute)	EMISSION FACTORS (lb pollutant/1,000 inches cut, 1" thick)**				EMISSIONS (lbs/hr)				HAPS (lbs/hr)	
				PM = PM ₁₀	Mn	Ni	Cr	PM/PM10/PM2.5	Mn	Ni	Cr		
Oxyacetylene				0.1622	0.0005	0.0001	0.0003	0.000	0.000	0.000	0.000		0.000
Oxymethane				0.0815	0.0002		0.0002	0.000	0.000	0.000	0.000		0.000
Plasma**				0.0039				0.000	0.000	0.000	0.000		0.000
EMISSION TOTALS													
Potential Emissions lbs/hr								0.003	0.002	5.00E-06	5.00E-06		0.002
Potential Emissions lbs/day								0.06	0.04	1.20E-04	1.20E-04		0.04
Potential Emissions tons/year								0.01	0.01	2.19E-05	2.19E-05		0.01

Methodology

*Emission Factors are default values for carbon steel unless a specific electrode type is noted in the Process column.

**Emission Factor for plasma cutting from American Welding Society (AWS). Trials reported for wet cutting of 8 mm thick mild steel with 3.5 m/min cutting speed (at 0.2 g/min emitted). Therefore, the emission factor for plasma

Using AWS average values: (0.25 g/min)/(3.6 m/min) x (0.0022 lb/g)/(39.37 in./m) x (1,000 in.) = 0.0039 lb/1,000 in. cut, 8 mm thick

Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used)

Cutting emissions, lb/hr: (# of stations)(max. metal thickness, in.)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 1" thick)

Plasma cutting emissions, lb/hr: (# of stations)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 8 mm thick)

Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day

Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/year x 1 ton/2,000 lbs.

**Appendix A: Emissions Calculations
Miscellaneous Woodworking (WW1)**

Company Name: Indiana Composites, LLC
Source Address: 606 West Center Street, Bourbon, IN 46504
Part 70 Operating Permit No.: T099-37220-00118
Significant Source Modification: T099-37399-00118
Reviewer: Adam Wheat

Wood Cutting

Process / Operation	Description	ID	Material Thickness (in)	Cutting Surface Thickness (in)	Process rate (in/hr)	Material Loss (in ³ /hr)	Material Density (lb/in ³)	Process Weight Rate (ton/hr)	Potential to Emit (lb/hr)
Cutting	Table Saw	TS1	0.25	0.031	90.00	0.698	0.023	8.3835	0.016
Cutting	Radial Arm Saw	RAS1	0.25	0.031	90.00	0.698	0.023	8.3835	0.016
Cutting	Bandsaw	BS1	0.25	0.031	90.00	0.698	0.023	8.3835	0.016
Total								25.1505	

Total Potential to Emit

Total Particulate Emissions (lb/hr)	0.048
Total Particulate Emissions (lb/day)	1.16
Total Particulate Emissions (tons/yr)	0.21

Note:

Material Density (lb/in³) = 40 lb/ft³ or 0.023 lb/in³ for Southern Pine

Methodology

Material Loss for Sander/Cutting (in³/hr) = Surface Thickness (in) * Surface Width (in) * Surface Distance (in/hr)

Material Loss for Routing (in³/hr) = Material Thickness (in) * Bit Area (in²) * Process Rate (in/hr)

Potential to Emit (lb/hr) = Material Loss (in³/hr) * Material Density (lb/in³)

Potential to Emit (lb/day) = Potential to Emit (lb/hr) * 24 hr/day

Potential to Emit (tons/yr) = Potential to Emit (lb/hr) * 8,760 hr/yr ÷ 2,000 lbs/ton

326 IAC 6-3-2

Process	Uncontrolled PTE of PM (lbs/hr)	PTE of PM After Integral Woodworking Controls (lbs/hr)	Subject to 326 IAC 6-3-2?	Maximum Process Weight (tons/hr)	326 IAC 6-3-2 Allowable Particulate Emission Rate (lbs/hr)	Is a Control Device Needed to Comply with 326 IAC 6-3-2?
Cutting (3 saws)	0.048	NA	No	25.1505	35.58	No

Allowable emissions under 326 IAC 6-3-2 are calculated using the equation where the process weight rate is up to sixty thousand (60,000) pounds per hour:

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

E = rate of emission in pounds per hour and

P = process weight rate in tons per hour

**Appendix A: Emissions Calculations
PM/PM10/PM2.5 Emissions
Paved Roads**

**Company Name: Indiana Composites, LLC
Source Address: 606 West Center Street, Bourbon, IN 46504
Part 70 Operating Permit No.: T099-37220-00118
Significant Source Modification: T099-37399-00118
Reviewer: Adam Wheat**

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 Information (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)
Moving Truck (2-axle) (26' Straight Truck) - Entry and Exit	5.0	2.0	10.0	10.0	100.0	250	0.047	0.5	172.8
Freight Truck (5 axes) - Entry and Exit	5.0	2.0	10.0	40.0	400.0	250	0.047	0.5	172.8
Totals			20.0		500.0			0.9	345.6

Average Vehicle Weight Per Trip =

25.0

 tons/trip
Average Miles Per Trip =

0.05

 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 =	25.0	25.0	25.0	tons = average vehicle weight (provided by source)
sL =	0.6	0.6	0.6	g/m ² = silt loading value for paved roads normal baseline conditions - Table 13.2.1-2

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 = $E_f * [1 - (p/4N)]$
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 =	0.184	0.037	0.0090	lb/mile
Mitigated Emission Factor, Eext =	0.168	0.034	0.0083	lb/mile

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)
Moving Truck (2-axle) (26' Straight Truck) - Entry and Exit	0.02	0.003	0.001	0.01	0.003	0.001
Freight Truck (5 axes) - Entry and Exit	0.02	0.003	0.001	0.01	0.003	0.001
Totals	0.03	0.01	0.002	0.03	0.006	0.001

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

August 15, 2016

Eric Rygaard
Indiana Composites
409 Growth Pkwy
Angola, IN 46703

Re: Public Notice
Indiana Composites
Permit Level: Title V - Transition from Registration & Title V - Significant Source Modification
Permit Number: 099 - 37220 - 00118 & 099 - 37399 - 00118

Dear Eric Rygaard:

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

The Office of Air Quality (OAQ) has prepared two versions of the Public Notice Document. The abbreviated version will be published in the newspaper, and the more detailed version will be made available on the IDEM's website and provided to interested parties. Both versions are included for your reference. The OAQ has requested that the Plymouth Pilot News in Plymouth, Indiana publish the abbreviated version of the public notice no later than August 17, 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 Bourbon Public Library, 307 North Main Street in Bourbon IN. 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 Adam Wheat, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension 3-8397 or dial (317) 233-8397.

Sincerely,
Len Pogost

Len Pogost
Permits Branch
Office of Air Quality

Enclosures
PN Applicant Cover letter 2/17/2016



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Carol S. Comer
Commissioner

ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING

August 15, 2016

Plymouth Pilot News
Attn: Classifieds
P.O. Box 220
Plymouth, IN 46563

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for Indiana Composites, Marshall 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 19, 2016.

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

To ensure proper payment, please reference account # 100174737.

We are required by the Auditor's Office to request that you place the Federal ID Number on all claims. If you have any conflicts, questions, or problems with the publishing of this notice or if you do not receive complete public notice information for this notice, please call Len Pogost at 800-451-6027 and ask for extension 3-2803 or dial 317-233-2803.

Sincerely,

Len Pogost

Len Pogost
Permit Branch
Office of Air Quality

Permit Level: Title V - Transition from Registration & Title V - Significant Source Modification
Permit Number: 099 - 37220 - 00118 & 099 - 37399 - 00118

Enclosure
PN Newspaper.dot 6/13/2013



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Michael R. Pence
Governor

Carol S. Comer
Commissioner

August 15, 2016

To: Bourbon Public Library 307 North Main Street Bourbon IN

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: Indiana Composites
Permit Number: 099 - 37220 - 00118 & 099 - 37399 - 00118

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
Governor

Carol S. Comer
Commissioner

Notice of Public Comment

August 15, 2016

Indiana Composites

099 - 37220 - 00118 & 099 - 37399 - 00118

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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Michael R. Pence
Governor

Carol S. Comer
Commissioner

AFFECTED STATE NOTIFICATION OF PUBLIC COMMENT PERIOD DRAFT INDIANA AIR PERMIT

August 15, 2016

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

Permit Number: 099 - 37220 - 00118 & 099 - 37399 - 00118
Applicant Name: Indiana Composites
Location: Bourbon, Marshall County, Indiana

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

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

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

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

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

Affected States Notification.dot 2/17/2016

Mail Code 61-53

IDEM Staff	LPOGOST 8/15/2016 Indiana Composites LLC 099 - 37220 - 00118 & 099 - 37399 - 00118 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		Eric Rygaard Indiana Composites LLC 409 Growth Pkwy Angola IN 46703 (Source CAATS)										
2		Michael Peters President Indiana Composites LLC 409 Growth Pkwy Angola IN 46703 (RO CAATS)										
3		Bourbon Public Library 307 North Main Street Bourbon IN 46504 (Library)										
4		Marshall County Commissioners 112 West Jefferson Street Plymouth IN 46563 (Local Official)										
5		Bourbon Town Council 104 E. Park Ave Bourbon IN 46504 (Local Official)										
6		Marshall County Health Department 112 W Jefferson Street, Suite 103 Plymouth IN 46563-1764 (Health Department)										
7		LaPaz Town Council PO Box 0820 LaPaz IN 46537 (Local Official)										
8		Ms. Julie Grzesiak 139 N. Michigan St. Argos IN 46501 (Affected Party)										
9		Omnisource 7575 W Jefferson Blvd Fort Wayne IN 46809 (Affected Party)										
10		Franklin Border 836 Lincoln Hwy Bourbon IN 46504 (Affected Party)										
11		Beverly Irvine 8833 15B Rd Argos IN 46501 (Affected Party)										
12		D. Anne Pershing 503 W Center Street Bourbon IN 46504 (Affected Party)										
13		D B & E Rentals, LLC PO Box 137 Bourbon IN 46504 (Affected Party)										
14		New York Central Lines, LLC 500 Water Street (J-910) Jacksonville FL 32202 (Affected Party)										
15		Kevin Parks D & B Environmental 401 Lincoln Way West Osceola IN 46561 (Consultant)										

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