



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

Preliminary Findings Regarding a
Significant Modification to a
Part 70 Operating Permit
for Ashley Industrial Molding, Inc. in DeKalb County
Significant Source Modification No.: 033-40422-00017
Significant Permit Modification No.: 033-40672-00017

The Indiana Department of Environmental Management (IDEM) has received an application from Ashley Industrial Molding, Inc., located at 310 South Wabash Avenue, Ashley, IN 46705, for a significant modification of its Part 70 Operating Permit issued on March 21, 2017. If approved by IDEM's Office of Air Quality (OAQ), this proposed modification would allow Ashley Industrial Molding, Inc. to make certain changes at its existing source. Ashley Industrial Molding, Inc. has applied to add a robotic router, identified as follows:

One (1) robotic router, identified as CNC 12, approved in 2018 for construction, used while finishing molded parts prior to painting, with a nominal throughput of 10.4 parts per hour, using a dust collector, identified as DC09, for particulate control, and exhausting to the atmosphere.

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

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

Grant Township Public Library
300 South Wayne Street
Waterloo, IN 46793

and

IDEM Northern Regional Office
300 North Dr. Martin Luther King Jr. Boulevard, 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/>.

A copy of the preliminary findings is also available via IDEM's Virtual File Cabinet (VFC.) Please go to: <http://www.in.gov/idem/> and enter VFC in the search box. You will then have the option to search for permit documents using a variety of criteria.

How can you participate in this process?

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

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

Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so that you can be added to IDEM's mailing list to receive notice of future action related to this permit. If you do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit number SSM No.: 033-40422-00017 and SPM No.: 033-40672-00017 in all correspondence.

Comments should be sent to:

Jerjes Smirat
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for Jerjes Smirat or (317) 234-5374
Or dial directly: (317) 234-5374
Fax: (317) 232-6749 attn: Jerjes Smirat
E-mail: JSmirat@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 Air Permits page on the Internet at: <http://www.in.gov/idem/airquality/2356.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 IDEM Regional Office indicated above, at the local library indicated above, and the IDEM public file room on the 12th floor of the Indiana Government Center North, 100 N. Senate Avenue, Indianapolis, Indiana 46204-2251.

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


Iryn Callifung, Section Chief
Permits Branch
Office of Air Quality



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Ms. Catherine Mowery
Ashley Industrial Molding, Inc.
310 South Wabash Avenue
Ashley, IN 46705

Re: 033-40422-00017
Significant Source Modification

Dear Ms. Catherine Mowery:

Ashley Industrial Molding, Inc. was issued Part 70 Operating Permit Renewal No. T033-37491-00017 on March 21, 2017 for a stationary high-pressure fiberglass reinforced plastic parts manufacturing and painting source located at 310 South Wabash Avenue, Ashley, Indiana 46705. An application to modify the source was received on September 5, 2018. 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 unit is approved for construction at the source:

One (1) robotic router, identified as CNC 12, approved in 2018 for construction, used while finishing molded parts prior to painting, with a nominal throughput of 10.4 parts per hour, using a dust collector, identified as DC09, for particulate control, and exhausting to the atmosphere.

The following construction conditions are applicable to the proposed modification:

General Construction Conditions

1. 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.

Effective Date of the Permit

3. Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.

Commenced Construction

4. 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.

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Approval to Construct

6. Pursuant to 326 IAC 2-7-10.5(h)(2), this Significant Source Modification authorizes the construction of the new emission unit(s), when the Significant Source Modification has been issued.

Pursuant to 326 IAC 2-7-10.5(m), the emission units constructed under this approval shall not be placed into operation prior to revision 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 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 as 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/>. A copy of the permit is also available via IDEM's Virtual File Cabinet (VFC.) Please go to: <http://www.in.gov/idem/> and enter VFC in the search box. You will then have the option to search for permit documents using a variety of criteria. For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Air Permits page on the Internet at: <http://www.in.gov/idem/airquality/2356.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 regarding this matter, please contact Jeries Smirat, Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251, or by telephone at (317) 234-5374 or (800) 451-6027, and ask for Jeries Smirat or (317) 234-5374.

Sincerely,

Iryn Calilung, Section Chief
Permits Branch
Office of Air Quality

Attachments: Significant Source Modification and Technical Support Document

cc: File - DeKalb County
DeKalb 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

Ashley Industrial Molding, Inc.
310 South Wabash Avenue
Ashley, Indiana 46705

(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.: 033-40422-00017	
Master Agency Interest ID.: 15488	
Issued by: Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date:

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Attachment C: 40 CFR Part 63, Subpart DDDDD—National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters

Attachment D: 40 CFR Part 60, Subpart JJJJ— Standards of Performance for Stationary Spark Ignition Internal Combustion Engines

Attachment E: 40 CFR Part 63, Subpart ZZZZ— National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

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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 high-pressure fiberglass reinforced plastic parts manufacturing and painting source.

Source Address:	310 South Wabash Avenue, Ashley, Indiana 46705
General Source Phone Number:	260-587-9155
SIC Code:	3089 (Plastics Products, not elsewhere classified)
County Location:	DeKalb
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Operating Permit Program Minor Source, under PSD 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) surface coating line, consisting of two (2) surface coating booths, with a total nominal throughput of 45.4 gallons of coating per hour:

- (1) One (1) manual and robotic prime booth with one (1) flash off tunnel, identified as SB-1, installed in 1987, equipped with HVLP applicators, approved in 2018 for robotic application, with dry filters for overspray control, exhausted through Stack SB-1.

Under NESHAP Subpart PPPP, this is an existing plastic parts coating operation in the general use and TPO coating subcategories.

- (2) One (1) manual and robotic topcoat booth with one (1) flash off tunnel, identified as SB-2, installed in 1987, equipped with HVLP applicators, approved in 2018 for robotic application, with dry filters for overspray control, exhausted through four (4) stacks (Stacks SB-2A through SB-2D).

Under NESHAP Subpart PPPP, this is an existing plastic parts coating operation in the general use and TPO coating subcategories.

Nine (9) Molding Presses:

- (b) One (1) 400-ton reinforced plastic molding press, identified as PR-440, installed prior to 1980, with a nominal capacity of 86 pounds of SMC per hour, no control.

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

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- (c) One (1) 600-ton reinforced plastic molding press, identified as PR-651, installed prior to 1980, with a nominal capacity of 12 pounds of SMC per hour, no control.

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

- (d) One (1) 800-ton reinforced plastic molding press, identified as PR-845, installed prior to 1980, with a nominal capacity of 195 pounds of SMC per hour, no control.

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

- (e) One (1) 1,000-ton reinforced plastic molding press, identified as PR-1039, installed prior to 1980, with a nominal capacity of 442 pounds of SMC per hour, no control.

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

- (f) One (1) 1,000-ton reinforced plastic molding press, identified as PR-1056, installed in 1986, with a nominal capacity of 355 pounds of SMC per hour, no control.

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

- (g) One (1) 2,000-ton reinforced plastic molding press, identified as PR-2053, installed prior to 1980, with a nominal capacity of 454 pounds of SMC per hour, no control.

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

- (h) One (1) 2,500-ton reinforced plastic molding press, identified as PR-2560, installed in 1984, with a nominal capacity of 627 pounds of SMC per hour, no control.

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

- (i) One (1) 3,000-ton reinforced plastic molding press, identified as PR-3038, installed prior to 1980, with a nominal capacity of 1,098 pounds of SMC per hour, no control.

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

- (j) One (1) 2,500-ton reinforced plastic molding press, identified as PR-2561, installed in 2005, with a nominal capacity of 630 pounds of SMC per hour, no control.

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

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Two (2) Boilers:

- (k) One (1) boiler, identified as BLRA, installed in 1979, using natural gas as a primary fuel and No. 2 fuel oil as a backup fuel, exhausted through Stack 5A, with a nominal heat input capacity of 8.4 million British thermal units per hour, no control.

This is an affected source under the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters 40 CFR 63, Subpart DDDDD.

- (l) One (1) boiler, identified as BLRB, installed in 1975, using natural gas as a primary fuel and No. 2 fuel oil as a backup fuel, exhausted through Stack 5B, with a nominal heat input capacity of 4.2 million British thermal units per hour, no control.

This is an affected source under the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters 40 CFR 63, Subpart DDDDD.

- (m) Two (2) trimmers, identified as Router 1 and Router 2, used while finishing molded parts prior to painting, installed at separate times after 1980, each with a nominal throughput of 10 parts per hour, venting to a shared dust collector for particulate matter control, exhausting to atmosphere.
- (n) One (1) robotic router, identified as CNC 12, approved in 2018 for construction, used while finishing molded parts prior to painting, with a nominal throughput of 10.4 parts per hour, using a dust collector, identified as DC09, for particulate control, and exhausting to the atmosphere.

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

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

- (a) Three (3) cold cleaner covered degreasers, each constructed after July 1, 1990, used for maintenance purposes, with a nominal annual material usage of 8.76 gallons per year, each. Each degreaser is equipped with a remote solvent reservoir. [326 IAC 8-3-2][326 IAC 8-3-8]
- (b) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, including:
- (1) One (1) air make-up unit, identified as 60K, supplying heated air to the prime booths and flash off tunnels, constructed in 1980, with a nominal heat input capacity of 3.75 million British thermal units per hour.
- (2) One (1) air make-up unit, identified as 100K, supplying heated air to the prime booths and flash off tunnels, constructed in 1980, with a nominal heat input capacity of 9.72 million British thermal units per hour.
- (3) One (1) air make-up unit, identified as 30K, supplying heated air to the prime booths and flash off tunnels, constructed in 1980, with a nominal heat input capacity of 2.64 million British thermal units per hour.

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- (4) Two (2) water heaters, identified as Tank #2 and #3 Water Heaters, installed in 1989, each with a nominal heat input capacity of 3.8 million British thermal units per hour. [326 IAC 6-2-4]

The two (2) water heaters are affected sources under the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters 40 CFR 63, Subpart DDDDD.
 - (5) One (1) natural gas-fired topcoat bake oven, identified as SB-4, installed in 1987, with a nominal heat input capacity of 2.5 million British thermal units per hour, exhausting through Stack 2D.
 - (6) One (1) natural gas-fired dry off oven, identified as DRY-OFF, with a nominal heat input capacity of 2.2 million British thermal units per hour.
 - (7) One (1) air make-up unit, identified as 45K, supplying heated air to the Assembly/Warehouse area, constructed in 1980, nominally rated at 3.225 MMBtu/hr.
 - (8) two (2) air make-up units, identified as 25K-1 and 25K-2, supplying heated air to the SMC Warehouse area, each constructed in 1985, nominally rated at 0.25 MMBtu/hr and 0.27 MMBtu/hr.
 - (9) Two (2) space heaters located in the Shipping Warehouse, each constructed in 2010, nominally rated at 0.243 MMBtu/hr each.
 - (10) One (1) space heater located at Door #7, constructed in 2009, nominally rated at 0.99 MMBtu/hr.
 - (11) One (1) space heater located at Door #31, constructed in 2009, nominally rated at 0.99 MMBtu/hr.
 - (12) Three (3) catalytic heaters located in the Shipping Warehouse, each constructed in 2000, nominally rated at 0.06 MMBtu/hr each.
 - (13) One (1) air make-up unit, identified as Absolute Air 30K, installed in 2007, nominally rated at 2.999 MMBtu/hr.
 - (14) One (1) catalytic heater located in the RO Water area, installed in 2004, nominally rated at 0.03 MMBtu/hr.
 - (15) One (1) catalytic heater located in the Paint Department, installed in 2004, nominally rated at 0.06 MMBtu/hr.
 - (16) Five (5) catalytic heaters located in the Paint Department, each installed in 2004, each nominally rated at 0.04 MMBtu/hr.
 - (17) One natural gas-fired furnace, installed in 2005, providing heat to the main breakroom and overhead offices, nominally rated at 0.1 MMBtu/hr.
 - (18) One natural gas-fired furnace, installed in 2014, providing heat to the front office area, nominally rated at 0.06 MMBtu/hr.
- (c) One (1) natural gas fired 4SLB emergency generator, identified as Generator - Paint, installed in 2010, nominally rated at 198 HP, exhausting outdoors.

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Under NESHAP 40 CFR 63, Subpart ZZZZ this emergency generator is considered a new stationary reciprocating internal combustion engines (RICE) at a major source of HAPs.

Under NSPS 40 CFR 60, Subpart JJJJ, this emergency generator is considered an affected facility.

- (d) One (1) natural gas fired 4SLB emergency generator, identified as Generator - Main, installed in 2012, nominally rated at 77.3 HP, exhausting outdoors.

Under NESHAP 40 CFR 63, Subpart ZZZZ this emergency generator is considered a new stationary reciprocating internal combustion engines (RICE) at a major source of HAPs.

Under NSPS 40 CFR 60, Subpart JJJJ, this emergency generator is considered an affected facility.

- (e) Combustion source flame safety purging on startup.
- (f) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.
- (g) The following VOC and HAP storage containers: vessels storing lubricating oil, hydraulic oils, machining oils, and machining fluids.
- (h) The following equipment not related to manufacturing activities and not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (i) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment. [326 IAC 2-7-1(21)(J)(x)]
- (j) Heat exchanger cleaning and repair.
- (k) Paved and unpaved roads and parking lots with public access.
- (l) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.
- (m) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (n) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kiloPascals measured at 38°C).
- (o) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.
- (p) One (1) five (5) stage parts washer, identified as WASHER, using non-VOC containing detergents to wash plastic parts prior to painting.
- (q) One (1) sanding booth utilizing hand held circular sanders for removing surface blemishes prior to painting.
- (r) Production related activities, including the following [326 IAC 2-7-1(21)(J)(vi)]:
 - (1) Application of greases, lubricants or nonvolatile materials as temporary protective

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- coatings.
- (2) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (3) Closed loop heating and cooling systems.
- (s) Water-based activities, including the following [326 IAC 2-7-1(21)(J)(ix)]:
 - (1) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to one percent (1%) by volume.
 - (2) Noncontact cooling tower systems that are forced and induced draft cooling tower systems not regulated under a NESHAP.
- (t) Enclosed conveyor systems for conveying plastic raw materials and plastic finished goods. [326 IAC 2-7-1(21)(J)(xiv)]
- (u) Routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process, including purging of gas lines. [326 IAC 2-7-1(21)(J)(xvii)]
- (v) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors, and electrostatic precipitators with a design grain loading of less than or equal to three onehundredths (0.03) grains per actual cubic foot and a gas flow rate less than or equal to four thousand (4,000) actual cubic feet per minute, including polishing and buffing. [326 IAC 2-7-1(21)(J)(xxiii)]
- (w) Filter or coalescer media changeout. [326 IAC 2-7-1(21)(J)(xxv)]
- (x) Emissions from a laboratory as defined in 326 IAC 2-7-1(21)(G).
- (y) Emissions from research and development activities as defined in 326 IAC 2-7-1(21)(H).
- (z) Additional insignificant activities reported by the source:
 - (1) Ancillary molding activities:
 - (A) handheld tools, spindle sander, drill press.
 - (B) lubrication of molds and mold pins as needed.
 - (C) use of filler and sealer to address small imperfections by hand as needed.
 - (2) Bonding process - hand applying adhesive onto parts. The parts are then placed in a bonder unit which applies pressure and heat to bond the parts.
 - (3) Assembly area - use of small amounts of adhesive to attach components to parts by hand.
 - (4) Paint kitchen - storing paint and additives. The paint and additives are also mixed into containers smaller than 100 gallons in this area before being dispensed to the paint booths (paint usage tracked in surface coating emission calculations for Condition D.1.1).
 - (5) Finesse area - touch up, polish minor imperfections as needed.

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

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

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

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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 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, T033-37491-00017, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

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

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

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

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

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

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

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

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

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

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

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

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

- (a) A certification required by this permit meets the requirements of 326 IAC 2-7-6(1) if:
- (1) it contains a certification by a "responsible official" as defined by 326 IAC 2-7-1(35), and
 - (2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) A "responsible official" is defined at 326 IAC 2-7-1(35).

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

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

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

and

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

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

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

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

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

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

The Permittee shall implement the PMPs.

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

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

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

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

The Permittee shall implement the PMPs.

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- (c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

- (a) All terms and conditions of permits established prior to T033-37491-00017 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised under 326 IAC 2-7-10.5, or
 - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

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

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

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

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

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

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

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
 - (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

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

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

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

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

- (a) No Part 70 permit revision or notice shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

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

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b) or (c) without a prior permit revision, if each of the following conditions is met:
 - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;

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

(4) The Permittee notifies the:

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

and

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

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

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

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

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

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

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

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

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- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

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

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

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

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

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

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

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

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

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

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

- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

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

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

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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 manufacturing 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]

The Permittee shall comply with the applicable requirements of 326 IAC 14-10, 326 IAC 18, and 40 CFR 61.140 when conducting any asbestos abatement project covered by those rules.

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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)][40 CFR 64][326 IAC 3-8]

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

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

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

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

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

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

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

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

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

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

- (a) The Permittee shall maintain the most recently submitted written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

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C.13 Risk Management Plan [326 IAC 2-7-5(11)][40 CFR 68]

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

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

- (I) Upon detecting an excursion where a response step is required by the D Section, or an exceedance of a limitation, not subject to CAM, in this permit:
 - (a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.
 - (b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:
 - (1) initial inspection and evaluation;
 - (2) recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system); or
 - (3) any necessary follow-up actions to return operation to normal or usual manner of operation.
 - (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
 - (1) monitoring results;
 - (2) review of operation and maintenance procedures and records; and/or
 - (3) inspection of the control device, associated capture system, and the process.
 - (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
 - (e) The Permittee shall record the reasonable response steps taken.
- (II)
 - (a) *CAM Response to excursions or exceedances.*
 - (1) Upon detecting an excursion or exceedance, subject to CAM, the Permittee shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal

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without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

- (2) Determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.
- (b) If the Permittee identifies a failure to achieve compliance with an emission limitation, subject to CAM, or standard, subject to CAM, for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the Permittee shall promptly notify the IDEM, OAQ and, if necessary, submit a proposed permit modification to this permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.
- (c) Based on the results of a determination made under paragraph (II)(a)(2) of this condition, the EPA or IDEM, OAQ may require the Permittee to develop and implement a Quality Improvement Plan (QIP). The Permittee shall develop and implement a QIP if notified to in writing by the EPA or IDEM, OAQ.
- (d) Elements of a QIP:
The Permittee shall maintain a written QIP, if required, and have it available for inspection. The plan shall conform to 40 CFR 64.8 b (2).
- (e) If a QIP is required, the Permittee shall develop and implement a QIP as expeditiously as practicable and shall notify the IDEM, OAQ if the period for completing the improvements contained in the QIP exceeds 180 days from the date on which the need to implement the QIP was determined.
- (f) Following implementation of a QIP, upon any subsequent determination pursuant to paragraph (II)(c) of this condition the EPA or the IDEM, OAQ may require that the Permittee make reasonable changes to the QIP if the QIP is found to have:
 - (1) Failed to address the cause of the control device performance problems;
or
 - (2) Failed to provide adequate procedures for correcting control device performance problems as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
- (g) Implementation of a QIP shall not excuse the Permittee from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting or recordkeeping requirement that may apply under federal, state, or local law, or any other applicable requirements under the Act.
- (h) *CAM recordkeeping requirements.*
 - (1) The Permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality

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

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

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

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

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

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

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

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

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

The statement must be submitted to:

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

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

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

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

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

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

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

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

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

C.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)][326 IAC 2-1.1-11] [40 CFR 64][326 IAC 3-8]

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

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

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

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

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

- (b) The address for report submittal is:

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

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

Stratospheric Ozone Protection

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

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

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SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(a) One (1) surface coating line, consisting of two (2) surface coating booths, with a total nominal throughput of 45.4 gallons of coating per hour:

(1) One (1) manual and robotic prime booth with one (1) flash off tunnel, identified as SB-1, installed in 1987, equipped with HVLP applicators, approved in 2018 for robotic application, with dry filters for overspray control, exhausted through Stack SB-1.

Under NESHAP Subpart PPPP, this is an existing plastic parts coating operation in the general use and TPO coating subcategories.

(2) One (1) manual and robotic topcoat booth with one (1) flash off tunnel, identified as SB-2, installed in 1987, equipped with HVLP applicators, approved in 2018 for robotic application, with dry filters for overspray control, exhausted through four (4) stacks (Stacks SB-2A through SB-2D).

Under NESHAP Subpart PPPP, this is an existing plastic parts coating operation in the general use and TPO coating subcategories.

Nine (9) Molding Presses:

(b) One (1) 400-ton reinforced plastic molding press, identified as PR-440, installed prior to 1980, with a nominal capacity of 86 pounds of SMC per hour, no control.

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

(c) One (1) 600-ton reinforced plastic molding press, identified as PR-651, installed prior to 1980, with a nominal capacity of 12 pounds of SMC per hour, no control.

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

(d) One (1) 800-ton reinforced plastic molding press, identified as PR-845, installed prior to 1980, with a nominal capacity of 195 pounds of SMC per hour, no control.

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

(e) One (1) 1,000-ton reinforced plastic molding press, identified as PR-1039, installed prior to 1980, with a nominal capacity of 442 pounds of SMC per hour, no control.

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

(f) One (1) 1,000-ton reinforced plastic molding press, identified as PR-1056, installed in 1986, with a nominal capacity of 355 pounds of SMC per hour, no control.

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

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- (g) One (1) 2,000-ton reinforced plastic molding press, identified as PR-2053, installed prior to 1980, with a nominal capacity of 454 pounds of SMC per hour, no control.

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

- (h) One (1) 2,500-ton reinforced plastic molding press, identified as PR-2560, installed in 1984, with a nominal capacity of 627 pounds of SMC per hour, no control.

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

- (i) One (1) 3,000-ton reinforced plastic molding press, identified as PR-3038, installed prior to 1980, with a nominal capacity of 1,098 pounds of SMC per hour, no control.

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

- (j) One (1) 2,500-ton reinforced plastic molding press, identified as PR-2561, installed in 2005, with a nominal capacity of 630 pounds of SMC per hour.

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

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

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

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

Pursuant to CP 033-5941-00017, issued on July 31, 2001, revised through SSM No. 033-32469-00017, issued on April 23, 2013 and 326 IAC 8-1-6 (New facilities; general reduction requirements), Best Available Control Technology (BACT) for the one (1) surface coating line, consisting of surface coating booths SB-1 and SB-2, has been determined to be:

- (a) The VOC delivered to the applicators including coatings, dilution solvents, and cleanup solvents shall not exceed 207 tons per twelve (12) consecutive month period, with compliance determined at the end of each month;

The amount of VOC in waste shipped offsite may be deducted from the reported monthly VOC input.

- (b) The method of application at the surface coating booths shall be done with high volume low pressure (HVLP) spray applicators or electrostatic applicators; and
- (c) The VOC content of the primers and top coats shall not exceed 4.0 pounds per gallon as applied; and
- (d) The following management and work practices shall apply:
- (1) Operator training course.
 - (2) Spray gun cleaning.

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- (3) The cleanup solvent containers used to transport solvent from drums to work stations shall be closed containers having soft gasketed closures.
- (4) The application equipment operators shall be instructed and trained on the methods and practices utilized to minimize spillage on the floor and over application.
- (5) Storage containers used to store VOC and/or HAPs containing materials shall be kept covered when not in use.

D.1.2 PSD Minor Limit [326 IAC 2-2]

In order to render 326 IAC 2-2 (PSD) not applicable, the total combined VOC emissions from the use of coatings, dilution solvents, and cleaning solvents used in the surface coating booths (SB-1 and SB-2) and the material and cleaning solvents used in the nine (9) molding presses (PR-440, PR-651, PR-845, PR-1039, PR-1056, PR-2053, PR-2560, PR-3038, and PR-2561) shall not exceed 240 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

The amount of VOC in waste shipped offsite may be deducted from the reported monthly VOC input.

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

D.1.3 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from the one (1) surface coating line, consisting of two (2) surface coating booths, identified as SB-1 and SB-2, shall be controlled by dry particulate filters at all times that the process is in operation, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

Compliance with this requirement also renders 326 IAC 2-2 (PSD) not applicable.

D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

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

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

D.1.5 Volatile Organic Compounds (VOC) [326 IAC 8-1-4][326 IAC 8-1-2(a)]

- (a) Compliance with the VOC content and usage limitations contained in Conditions D.1.1 and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4. The amount of VOC in waste shipped offsite may be deducted from the reported monthly VOC input.
- (b) Compliance with the VOC emission limit contained in Condition D.1.1 shall be demonstrated not later than thirty (30) days after the end of each month.

This determination shall be based on the total VOC usage for the previous month, minus any VOC shipped off-site, and adding it to the previous eleven (11) months total VOC

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emissions, minus any VOC shipped off-site, so as to arrive at VOC usage for the most recent twelve (12) consecutive month period.

The VOC emissions for each month shall be calculated using the following equation:

$$\text{VOC}_{\text{SC}} = \text{VOC}_{\text{U}} - \text{VOC}_{\text{R}}$$

Where:

VOC_{SC} = VOC emissions from the two (2) surface coating booths (tons/month);

VOC_{U} = total amount of input VOC delivered to the two (2) surface coating booths, including coatings, dilution solvents, and cleaning solvents (tons/month); and

VOC_{R} = total amount of VOC waste from the two (2) surface coating booths, shipped off-site, including coatings, dilution solvents, and cleaning solvents (tons/month).

- (c) Compliance with the VOC emission limit contained in Condition D.1.2 shall be demonstrated not later than thirty (30) days after the end of each month.

This determination shall be based on the total VOC emissions determined for the two (2) surface coating booths and nine (9) molding presses for the previous month, minus any VOC shipped off-site, and adding it to the previous eleven (11) months total VOC emissions, minus any VOC shipped off-site, so as to arrive at VOC emissions for the most recent twelve (12) consecutive month period.

The VOC emissions for each month shall be calculated using the following equations:

$$\text{VOC} = \text{VOC}_{\text{SC}} + \text{VOC}_{\text{M}}$$

Where:

VOC = VOC emissions (tons/month)

VOC_{SC} = VOC emissions from the two (2) surface coating booths as determined under Condition D.1.5(b) (tons/month).

VOC_{M} = VOC emissions from nine (9) molding presses (tons/month)
= [material used in the nine (9) molding presses (tons/ month) * monomer content (%) * flash off factor (1.5%)] + VOC from cleaning solvents used in the nine (9) molding presses (tons/ month period) - WS_{RO}

WS_{RO} = total amount of VOC waste from the nine (9) molding presses shipped off-site, including material used in molding and cleaning solvents (tons/month).

- (d) If the amount of VOC waste shipped off-site for recycling or disposal is deducted from the monthly VOC emissions reported for the two (2) surface coating booths and nine (9) molding presses, the Permittee shall determine the VOC content of the waste shipped off-site using one or a combination of the following methods:

(1) On-site sampling:

- (A) VOC content shall be determined pursuant to 326 IAC 8-1-4(a)(3) by EPA Reference Method 24 and the sampling procedures in 326 IAC 8-1-4 or other methods as approved by the Commissioner.

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- (B) If a single, homogeneous waste stream is collected and bulked separately, a sample shall be collected from each container and a composite sample analyzed for each waste shipment.
- (C) If multiple waste streams are collected and bulked separately, a sample shall be collected and analyzed from each waste stream.
- (D) A new representative sample shall be collected and analyzed whenever a change or changes occur(s) that could result in a cumulative ten percent (10%) or more decrease in the VOC content of the VOC containing waste. Such change could include, but is not limited to, the following:
 - (i) A change in VOC material usage selection or formulation, as supplied or as applied, or
 - (ii) An operational change in the VOC material usage application or cleanup operations.

The new VOC content shall be used in calculating the amount of VOC in waste shipped off-site, starting with the date that the change occurred. The sample shall be collected and analyzed no later than thirty (30) days after the change.

- (2) Certified Waste Report:
The VOC reported by analysis of an off-site waste processor may be used, provided the report certifies the amount of VOC in the waste.
- (3) Minimum Assumed VOC content:
The VOC content of the waste shipped offsite may be assumed to be equal to the VOC content of the material with the lowest VOC content that could be present in the waste, as determined using the "as supplied" and "as applied" VOC data sheets, for each month.

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

D.1.6 Monitoring [40 CFR 64, Compliance Assurance Monitoring (CAM)]

Pursuant to 40 CFR 64 (CAM),

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the dry filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from Stacks SB-1, SB-2A, SB-2B SB-2C, and SB-2D while one or more of the surface coating booths are in operation. If a condition exists which should result in a response step, 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 steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the emissions from Stacks SB-1, SB-2A, SB-2B, SB-2C, and SB-2D 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 reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

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

D.1.7 Record Keeping Requirements

- (a) To document the compliance status with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records necessary to demonstrate the compliance status shall be available not later than thirty (30) days after the end of each compliance period.
- (1) The amount and VOC content of each coating, closed molding material, and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings or closed molding materials and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The cleanup solvent usage for each month;
 - (4) The total VOC usage for each month;
 - (5) The total VOC shipped off-site for each month if electing to deduct from the monthly VOC emissions; and
 - (6) The weight of VOCs emitted for each compliance period.
- (b) To document the compliance status with Conditions D.1.3 and D.1.6, the Permittee shall maintain a log of weekly overspray observations, daily filter inspections, and monthly rooftop and nearby ground inspections.
- (c) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

D.1.8 Reporting Requirements

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

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SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (k) One (1) boiler, identified as BLRA, installed in 1979, using natural gas as a primary fuel and No. 2 fuel oil as a backup fuel, exhausted through Stack 5A, with a nominal heat input capacity of 8.4 million British thermal units per hour, no control.

This is an affected source under the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters 40 CFR 63, Subpart DDDDD.

- (l) One (1) boiler, identified as BLRB, installed in 1975, using natural gas as a primary fuel and No. 2 fuel oil as a backup fuel, exhausted through Stack 5B, with a nominal heat input capacity of 4.2 million British thermal units per hour, no control.

This is an affected source under the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters 40 CFR 63, Subpart DDDDD.

Insignificant Activities:

- (b) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, including:

- (1) One (1) air make-up unit, identified as 60K, supplying heated air to the prime booths and flash off tunnels, constructed in 1980, with a nominal heat input capacity of 3.75 million British thermal units per hour.
- (2) One (1) air make-up unit, identified as 100K, supplying heated air to the prime booths and flash off tunnels, constructed in 1980, with a nominal heat input capacity of 9.72 million British thermal units per hour.
- (3) One (1) air make-up unit, identified as 30K, supplying heated air to the prime booths and flash off tunnels, constructed in 1980, with a nominal heat input capacity of 2.64 million British thermal units per hour.
- (4) Two (2) water heaters, identified as Tank #2 and #3 Water Heaters, installed in 1989, each with a nominal heat input capacity of 3.8 million British thermal units per hour. [326 IAC 6-2-4]

The two (2) water heaters are affected sources under the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters 40 CFR 63, Subpart DDDDD.

- (7) One (1) air make-up unit, identified as 45K, supplying heated air to the Assembly/Warehouse area, constructed in 1980, nominally rated at 3.225 MMBtu/hr.
- (8) two (2) air make-up units, identified as 25K-1 and 25K-2, supplying heated air to the SMC Warehouse area, each constructed in 1985, nominally rated at 0.25 MMBtu/hr and 0.27 MMBtu/hr.
- (9) Two (2) space heaters located in the Shipping Warehouse, each constructed in 2010,

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nominally rated at 0.243 MMBtu/hr each.

- (10) One (1) space heater located at Door #7, constructed in 2009, nominally rated at 0.99 MMBtu/hr.
- (11) One (1) space heater located at Door #31, constructed in 2009, nominally rated at 0.99 MMBtu/hr.
- (12) Three (3) catalytic heaters located in the Shipping Warehouse, each constructed in 2000, nominally rated at 0.06 MMBtu/hr each.
- (13) One (1) air make-up unit, identified as Absolute Air 30K, installed in 2007, nominally rated at 2.999 MMBtu/hr.
- (14) One (1) catalytic heater located in the RO Water area, installed in 2004, nominally rated at 0.03 MMBtu/hr.
- (15) One (1) catalytic heater located in the Paint Department, installed in 2004, nominally rated at 0.06 MMBtu/hr.
- (16) Five (5) catalytic heaters located in the Paint Department, each installed in 2004, each nominally rated at 0.04 MMBtu/hr.
- (17) One natural gas-fired furnace, installed in 2005, providing heat to the main breakroom and overhead offices, nominally rated at 0.1 MMBtu/hr.
- (18) One natural gas-fired furnace, installed in 2014, providing heat to the front office area, nominally rated at 0.06 MMBtu/hr.

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

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

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

Pursuant to 326 IAC 6-2-3(e), the PM emissions from each unit listed in the table below shall in no case exceed six tenths (0.6) pounds per million British thermal units heat input.

Construction date	Emission Unit
1975	boiler BLRB
1979	boiler BLRA
1980	air make-up 60K
1980	air make-up 100K
1980	air make-up 30K
1980	air make-up 45K

D.2.2 Particulate [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Limitations for Sources of Indirect Heating) the particulate emissions from each unit listed in the table below shall not exceed the pounds per MMBtu heat input emission limits, as listed in the table.

This limitation is based on the following equation:

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$$P_t = \frac{1.09}{Q^{0.26}}$$

Where:

P_t = pounds of particulate matter emitted per million Btu heat input (lb/MMBtu)
 Q = total source operating capacity

Year Constructed	Emission Unit	Maximum Capacity of units constructed (MMBtu/hr)	Total Source Operating Capacity at the time of construction (MMBtu/hr) (Q)	PM Emission Limitation for each unit (lbs/MMBtu) (Pt)
1985	make-up 25K-1	0.25	38.325	0.422 (each)
	make-up 25K-2	0.27		
1989	water heater tank #1	3.8	45.925	0.403 (each)
	water heater tank #2	3.8		
2000	three (3) catalytic heaters	0.18 (3 @ 0.06, each)	46.105	0.403 (each)
2004	catalytic heater	0.03	46.395	0.402 (each)
	catalytic heater	0.06		
	five (5) catalytic heaters	0.20 (5 @ 0.04, each)		
2005	furnace - breakroom	0.1	46.495	0.402
2007	make-up 30K	2.999	49.494	0.395
2009	two (2) space heaters	1.98 (2 @ 0.99, each)	51.474	0.391 (each)
2010	two (2) space heaters	0.486 (2 @ 0.243, each)	51.96	0.390 (each)
2014	furnace - office	0.06	52.02	0.390

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

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

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SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (m) Two (2) trimmers, identified as Router 1 and Router 2, used while finishing molded parts prior to painting, installed at separate times after 1980, each with a nominal throughput of 10 parts per hour, venting to a shared dust collector for particulate matter control, exhausting to atmosphere.
- (n) One (1) robotic router, identified as CNC 12, approved in 2018 for construction, used while finishing molded parts prior to painting, with a nominal throughput of 10.4 parts per hour, using a dust collector, identified as DC09, for particulate control, and exhausting to the atmosphere.

Insignificant Activities:

- (a) Three (3) cold cleaner covered degreasers, each constructed after July 1, 1990, used for maintenance purposes, with a nominal annual material usage of 8.76 gallons per year, each. Each degreaser is equipped with a remote solvent reservoir. [326 IAC 8-3-2][326 IAC 8-3-8]

(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.3.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emissions shall be limited as follows:

Process	Control	Process Weight Rate (tons/hour)	PM (lb/hour)
Trimmer (Router 1)	Dust Collector	0.088	0.805
Trimmer (Router 2)	Dust Collector	0.088	0.805
Router (CNC 12)	Dust Collector; DC09	0.3484	2.02

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.3.2 Cold Cleaner (Degreaser) Operations [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980:

Pursuant to 326 IAC 8-3-2(a), the owner or operator of a cold cleaner degreaser shall ensure the following control equipment and operating requirements are met:

- (1) Equip the degreaser with a cover.

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- (2) Equip the degreaser with a device for draining cleaned parts.
- (3) Close the degreaser cover whenever parts are not being handled in the degreaser.
- (4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases.
- (5) Provide a permanent, conspicuous label that lists the operating requirements in subdivisions (3), (4), (6), and (7).
- (6) Store waste solvent only in closed containers.
- (7) Prohibit the disposal or transfer of waste solvent in such a manner that could allow greater than twenty percent (20%) of the waste solvent (by weight) to evaporate into the atmosphere.

D.3.3 Material Requirements for Cold Cleaner Degreasers [326 IAC 8-3-8]

Pursuant to 326 IAC 8-3-8(b)(2), the Permittee shall not operate a cold cleaner degreaser with a solvent that has a VOC composite partial vapor pressure that exceeds one (1) millimeter of mercury (nineteen-thousandths (0.019) pound per square inch) measured at twenty (20) degrees Celsius (sixty eight (68) degrees Fahrenheit).

D.3.4 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

A Preventive Maintenance Plan is required for the two (2) trimmers (Router 1 and Router 2) and their control device, and the router identified as CNC 12, and its dust collector DC9. Section B - Preventive Maintenance Plan contains the Permittee's obligations with regard to the Preventive Maintenance Plan required by this condition.

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

D.3.5 Particulate Control

- (a) In order to comply with Condition D.3.1, the dust collector for particulate control for the two (2) trimmers, identified as Router 1 and Router 2, shall be in operation and control emissions from the two (2) trimmers at all times the trimmers are in operation.
- (b) In order to comply with Condition D.3.1, the dust collector for particulate control, for the robotic router, identified as CNC 12, shall be in operation and control emissions from the router at all times the router is in operation.

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

D.3.6 Visible Emissions Notations

- (a) Daily visible emission notations of the dust collector exhausts shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions

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for that specific process.

- (e) If abnormal emissions are 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 steps required by this condition. Failure to take response steps 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.3.7 Record Keeping Requirements

- (a) Pursuant to 326 IAC 8-3-8(c)(2) and to document the compliance status with Condition D.3.3, the Permittee shall maintain the following records for each purchase of solvent used in the cold cleaner degreasing operations. These records shall be retained on-site or accessible electronically for the most recent three (3) year period and shall be reasonably accessible for an additional two (2) year period.
 - (1) The name and address of the solvent supplier.
 - (2) The date of purchase (or invoice/bill date of contract servicer indicating service date).
 - (3) The type of solvent purchased.
 - (4) The total volume of the solvent purchased.
 - (5) The true vapor pressure of the solvent measured in millimeters of mercury at twenty (20) degrees Celsius (sixty eight (68) degrees Fahrenheit).
- (b) To document the compliance status with Condition D.3.6, the Permittee shall maintain records of daily visible emission notations of the dust collector exhausts. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g., the process did not operate that day).
- (c) Section C - General Record Keeping Requirements, of this permit contains the Permittee's obligations with regards to the records required by this condition.

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SECTION E.1

NESHAP

Emissions Unit Description:

(a) One (1) surface coating line, consisting of two (2) surface coating booths, with a total nominal throughput of 45.4 gallons of coating per hour:

(1) One (1) manual and robotic prime booth with one (1) flash off tunnel, identified as SB-1, installed in 1987, equipped with HVLP applicators, approved in 2018 for robotic application, with dry filters for overspray control, exhausted through Stack SB-1.

Under NESHAP Subpart PPPP, this is an existing plastic parts coating operation in the general use and TPO coating subcategories.

(2) One (1) manual and robotic topcoat booth with one (1) flash off tunnel, identified as SB-2, installed in 1987, equipped with HVLP applicators, approved in 2018 for robotic application, with dry filters for overspray control, exhausted through four (4) stacks (Stacks SB-2A through SB-2D).

Under NESHAP Subpart PPPP, this is an existing plastic parts coating operation in the general use and TPO coating subcategories.

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

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

E.1.1 General Provisions Relating to National Emission Standards for Hazardous Air Pollutants under 40 CFR Part 63 [326 IAC 20-1][40 CFR Part 63, Subpart A]

(a) Pursuant to 40 CFR 63.1 the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 20-1, for the emission units listed above, except as otherwise specified in 40 CFR Part 63, Subpart 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.1.2 Coating of Plastic Parts and Products NESHAP [40 CFR Part 63, Subpart PPPP][326 IAC 20-81]

The Permittee shall comply with the applicable provisions of 40 CFR Part 63, Subpart PPPP (included as Attachment A to the operating permit), which are incorporated by reference as 326 IAC 20-81, for the emission units listed above. Where the NESHAP provides options for compliance, nothing in this condition precludes the Permittee from choosing among those options or requires the Permittee to use a particular option:

- (1) 40 CFR 63.4480.
- (2) 40 CFR 63.4481(a)(1), (2), (4), (b), (c).
- (3) 40 CFR 63.4482.

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- (4) 40 CFR 63.4483(a), (b), and (d).
- (5) 40 CFR 63.4490(b)(1), (b)(3), and (c).
- (6) 40 CFR 63.4491.
- (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.
- (12) 40 CFR 63.4520(a)(1)-(a)(4), (6).
- (13) 40 CFR 63.4530(a), (b), (c)(1), (c)(3), (d) through (h).
- (14) 40 CFR 63.4531.
- (15) 40 CFR 63.4550.
- (16) 40 CFR 63.4551.
- (17) 40 CFR 63.4552.
- (18) 40 CFR 63.4580.
- (19) 40 CFR 63.4581.
- (20) Tables 2, 3, and 4 to Subpart PPPP of Part 63 (applicable portions).

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SECTION E.2

NESHAP

Emissions Unit Description:

Nine (9) Molding Presses:

- (b) One (1) 400-ton reinforced plastic molding press, identified as PR-440, installed prior to 1980, with a nominal capacity of 86 pounds of SMC per hour, no control.

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

- (c) One (1) 600-ton reinforced plastic molding press, identified as PR-651, installed prior to 1980, with a nominal capacity of 12 pounds of SMC per hour, no control.

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

- (d) One (1) 800-ton reinforced plastic molding press, identified as PR-845, installed prior to 1980, with a nominal capacity of 195 pounds of SMC per hour, no control.

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

- (e) One (1) 1,000-ton reinforced plastic molding press, identified as PR-1039, installed prior to 1980, with a nominal capacity of 442 pounds of SMC per hour, no control.

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

- (f) One (1) 1,000-ton reinforced plastic molding press, identified as PR-1056, installed in 1986, with a nominal capacity of 355 pounds of SMC per hour, no control.

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

- (g) One (1) 2,000-ton reinforced plastic molding press, identified as PR-2053, installed prior to 1980, with a nominal capacity of 454 pounds of SMC per hour, no control.

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

- (h) One (1) 2,500-ton reinforced plastic molding press, identified as PR-2560, installed in 1984, with a nominal capacity of 627 pounds of SMC per hour, no control.

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

- (i) One (1) 3,000-ton reinforced plastic molding press, identified as PR-3038, installed prior to 1980, with a nominal capacity of 1,098 pounds of SMC per hour, no control.

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

- (j) One (1) 2,500-ton reinforced plastic molding press, identified as PR-2561, installed in 2005,

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with a nominal capacity of 630 pounds of SMC per hour.

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

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

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

E.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 units listed above, except as otherwise specified in 40 CFR Part 63, Subpart WWWW.
- (b) Pursuant to 40 CFR 63.10, the Permittee shall submit all required notifications and reports to:

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

E.2.2 Reinforced Plastics Composites Production NESHAP [40 CFR Part 63, Subpart WWWW][326 IAC 20-56]

The Permittee shall comply with the applicable provisions of 40 CFR Part 63, Subpart WWWW (included as Attachment B to the operating permit), which are incorporated by reference as 326 IAC 20-56, for the emission units listed above. Where the NESHAP provides options for compliance, nothing in this condition precludes the Permittee from choosing among those options or requires the Permittee to use a particular option:

- (1) 40 CFR 63.5780
- (2) 40 CFR 63.5785(a)
- (3) 40 CFR 63.5790
- (4) 40 CFR 63.5795(b)
- (5) 40 CFR 63.5800
- (6) 40 CFR 63.5805(b)
- (7) 40 CFR 63.5835(a) and (c)
- (8) 40 CFR 63.5840
- (9) 40 CFR 63.5860(a)
- (10) 40 CFR 63.5900(a)(4), (b), (c) and (e)
- (11) 40 CFR 63.5905
- (12) 40 CFR 63.5910(a), (b), (c), (d), (g) and (h)
- (13) 40 CFR 63.5915(a) and (d)
- (14) 40 CFR 63.5920
- (15) 40 CFR 63.5925
- (16) 40 CFR 63.5930
- (17) 40 CFR 63.5935
- (18) Tables 2, 4, 9, 13, 14 and 15 to Subpart WWWW of Part 63 (applicable portions).

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SECTION E.3

NESHAP

Emissions Unit Description:

- (k) One (1) boiler, identified as BLRA, installed in 1979, using natural gas as a primary fuel and No. 2 fuel oil as a backup fuel, exhausted through Stack 5A, with a nominal heat input capacity of 8.4 million British thermal units per hour, no control.

This is an affected source under the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters 40 CFR 63, Subpart DDDDD.

- (l) One (1) boiler, identified as BLRB, installed in 1975, using natural gas as a primary fuel and No. 2 fuel oil as a backup fuel, exhausted through Stack 5B, with a nominal heat input capacity of 4.2 million British thermal units per hour, no control.

This is an affected source under the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters 40 CFR 63, Subpart DDDDD.

Insignificant Activities:

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, including:

- (4) Two (2) water heaters, identified as Tank #2 and #3 Water Heaters, installed in 1989, each with a nominal heat input capacity of 3.8 million British thermal units per hour. [326 IAC 6-2-4]

The two (2) water heaters are affected sources under the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters 40 CFR 63, Subpart DDDDD.

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

National Emission Standards for Hazardous Air Pollutants (NESHAP) [40 CFR 60]

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

- (a) Pursuant to 40 CFR 63.1 the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 20-1, for the emission units listed above, except as otherwise specified in 40 CFR Part 63, Subpart DDDDD.
- (b) Pursuant to 40 CFR 63.10, the Permittee shall submit all required notifications and reports to:

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

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E.3.2 National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters [326 IAC 20-95][40 CFR Part 63, Subpart DDDDD]

The Permittee shall comply with the applicable provisions of 40 CFR Part 63, Subpart DDDDD (included as Attachment C to the operating permit), which are incorporated by reference as 326 IAC 20-95, for the emission units listed above. Where the NESHAP provides options for compliance, nothing in this condition precludes the Permittee from choosing among those options or requires the Permittee to use a particular option:

- (1) 40 CFR 63.7480
- (2) 40 CFR 63.7485
- (3) 40 CFR 63.7490(a)(1) and (d)
- (4) 40 CFR 63.7495(b) and (d)
- (5) 40 CFR 63.7499(l)
- (6) 40 CFR 63.7500(a)(1), (a)(3), (b), (e), and (f)
- (7) 40 CFR 63.7501
- (8) 40 CFR 63.7505(a)
- (9) 40 CFR 63.7515(d)
- (10) 40 CFR 63.7530(d), (e) and (f)
- (11) 40 CFR 63.7540(a)(10)(i-vi), (a)(11), (a)(12), (a)(13), and (b)
- (12) 40 CFR 63.7545(a), (b), (e), and (f)
- (13) 40 CFR 63.7550(a), (b), (c)(1), (c)(5)(i-iv, xiv), (h)(3)
- (14) 40 CFR 63.7555
- (15) 40 CFR 63.7560
- (16) 40 CFR 63.7565
- (17) 40 CFR 63.7570
- (18) 40 CFR 63.7575
- (19) Tables 3, 9, and 10 (applicable portions)

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SECTION E.4

NSPS

Emissions Unit Description:

Insignificant activities:

- (c) One (1) natural gas fired 4SLB emergency generator, identified as Generator - Paint, installed in 2010, nominally rated at 198 HP, exhausting outdoors.

Under NESHAP 40 CFR 63, Subpart ZZZZ this emergency generator is considered a new stationary reciprocating internal combustion engines (RICE) at a major source of HAPs.

Under NSPS 40 CFR 60, Subpart JJJJ, this emergency generator is considered an affected facility.

- (d) One (1) natural gas fired 4SLB emergency generator, identified as Generator - Main, installed in 2012, nominally rated at 77.3 HP, exhausting outdoors.

Under NESHAP 40 CFR 63, Subpart ZZZZ this emergency generator is considered a new stationary reciprocating internal combustion engines (RICE) at a major source of HAPs.

Under NSPS 40 CFR 60, Subpart JJJJ, this emergency generator is considered an affected facility.

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

New Source Performance Standards (NSPS) Requirements [326 IAC 2-7-5(1)]

E.4.1 General Provisions Relating to NSPS [326 IAC 12-1][40 CFR Part 60, Subpart A]

- (a) Pursuant to 40 CFR 60.1, the Permittee shall comply with the provisions of 40 CFR Part 60, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 12-1, for the emission units listed above, except as otherwise specified in 40 CFR Part 60, Subpart JJJJ.

- (b) Pursuant to 40 CFR 60.4, the Permittee shall submit all required notifications and reports to:

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

E.4.2 Standards of Performance for Stationary Spark Ignition Internal Combustion Engines NSPS [40 CFR Part 60, Subpart JJJJ]

The Permittee shall comply with the applicable provisions of 40 CFR Part 60, Subpart JJJJ (included as Attachment D to the operating permit), which are incorporated by reference as 326 IAC 12, for the emergency generator, identified as Generator - Paint. Where the NSPS provides options for compliance, nothing in this condition precludes the Permittee from choosing among those options or requires the Permittee to use a particular option:

- (1) 40 CFR 60.4230 (a)(4)(iv), (a)(6)
- (2) 40 CFR 60.4233 (e)
- (3) 40 CFR 60.4234

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- (4) 40 CFR 60.4236
- (5) 40 CFR 60.4243 (a)(1), (b)(1), (d), (e)
- (6) 40 CFR 60.4245 (a), (e)
- (7) 40 CFR 60.4246
- (8) 40 CFR 60.4248
- (9) Table 1 to Subpart JJJJ of Part 60 (applicable portions)
- (10) Table 3 to Subpart JJJJ of Part 60 (applicable portions)

E.4.3 Standards of Performance for Stationary Spark Ignition Internal Combustion Engines NSPS [40 CFR Part 60, Subpart JJJJ]

The Permittee shall comply with the applicable provisions of 40 CFR Part 60, Subpart JJJJ (included as Attachment D to the operating permit), which are incorporated by reference as 326 IAC 12, for the emergency generator, identified as Generator - Main. Where the NSPS provides options for compliance, nothing in this condition precludes the Permittee from choosing among those options or requires the Permittee to use a particular option:

- (1) 40 CFR 60.4230 (a)(4)(iv), (a)(6)
- (2) 40 CFR 60.4233 (d)
- (3) 40 CFR 60.4234
- (4) 40 CFR 60.4236
- (5) 40 CFR 60.4237 (c)
- (6) 40 CFR 60.4243 (a)(1), (b)(1), (d), (e)
- (7) 40 CFR 60.4245 (a), (e)
- (8) 40 CFR 60.4246
- (9) 40 CFR 60.4248
- (10) Table 1 to Subpart JJJJ of Part 60 (applicable portions)
- (11) Table 3 to Subpart JJJJ of Part 60 (applicable portions)

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SECTION E.5

NESHAP

Emissions Unit Description:

Insignificant activities:

- (c) One (1) natural gas fired 4SLB emergency generator, identified as Generator - Paint, installed in 2010, nominally rated at 198 HP, exhausting outdoors.

Under NESHAP 40 CFR 63, Subpart ZZZZ this emergency generator is considered a new stationary reciprocating internal combustion engines (RICE) at a major source of HAPs.

Under NSPS 40 CFR 60, Subpart JJJJ, this emergency generator is considered an affected facility.

- (d) One (1) natural gas fired 4SLB emergency generator, identified as Generator - Main, installed in 2012, nominally rated at 77.3 HP, exhausting outdoors.

Under NESHAP 40 CFR 63, Subpart ZZZZ this emergency generator is considered a new stationary reciprocating internal combustion engines (RICE) at a major source of HAPs.

Under NSPS 40 CFR 60, Subpart JJJJ, this emergency generator is considered an affected facility.

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

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

E.5.1 National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines NESHAP [40 CFR Part 63, Subpart ZZZZ][326 IAC 20-82]

The Permittee shall comply with the applicable provisions of 40 CFR Part 63, Subpart ZZZZ (included as Attachment E to the operating permit), which are incorporated by reference as 326 IAC 20-82, for the emission units listed above. Where the NESHAP provides options for compliance, nothing in this condition precludes the Permittee from choosing among those options or requires the Permittee to use a particular option:

- (1) 40 CFR 63.6580
- (2) 40 CFR 63.6585 (a), (b)
- (3) 40 CFR 63.6590 (a)(2)(ii), (c)(6)
- (4) 40 CFR 63.6675

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

Source Name: Ashley Industrial Molding, Inc.
Source Address: 310 South Wabash Avenue, Ashley, Indiana 46705
Part 70 Permit No.: T033-37491-00017

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: Ashley Industrial Molding, Inc.
Source Address: 310 South Wabash Avenue, Ashley, Indiana 46705
Part 70 Permit No.: T033-37491-00017

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 Quarterly Report

Source Name: Ashley Industrial Molding, Inc.
Source Address: 310 South Wabash Avenue, Ashley, Indiana 46705
Part 70 Permit No.: T033-30977-00017
Facility: Two (2) surface coating booths (SB-1 and SB-2)
Parameter: VOC usage
Limit: The VOC delivered to the applicators including cleanup solvents shall not exceed 207 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. The amount of VOC in waste shipped offsite may be deducted from the reported monthly VOC input. (Condition D.1.1)

QUARTER:

YEAR:

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

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

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

Part 70 Quarterly Report

Source Name: Ashley Industrial Molding, Inc.
Source Address: 310 South Wabash Avenue, Ashley, Indiana 46705
Part 70 Permit No.: T033-30977-00017
Facility: Two (2) surface coating booths (SB-1 and SB-2) and nine (9) molding presses (PR-440, PR-651, PR-845, PR-1039, PR-1056, PR-2053, PR-2560, PR-3038, and PR-2561)
Parameter: VOC emissions
Limit: The total combined VOC emissions from the use of coatings, dilution solvents, and cleaning solvents used in the surface coating booths and the material and cleaning solvents used in the nine (9) molding presses shall not exceed 240 tons per twelve (12) consecutive month period with compliance determined at the end of each month. The amount of VOC in waste shipped offsite may be deducted from the reported monthly VOC input. (Condition D.1.2)

QUARTER:

YEAR:

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

Submitted by: _____
Title / Position: _____
Signature: _____
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: Ashley Industrial Molding, Inc.
Source Address: 310 South Wabash Avenue, Ashley, Indiana 46705
Part 70 Permit No.: T033-37491-00017

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: _____

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

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

Source Description and Location

Source Name:	Ashley Industrial Molding, Inc.
Source Location:	310 South Wabash Avenue, Ashley, IN 46705
County:	DeKalb County
SIC Code:	3089 (Plastics Products, not elsewhere classified)
Operation Permit No.:	T 033-37491-00071
Operation Permit Issuance Date:	March 21, 2017
Significant Source Modification No.:	033-40422-00017
Significant Permit Modification No.:	033-40672-00017

Existing Approvals

The source was issued Part 70 Operating Permit Renewal No. 033-37491-00017 on March 21, 2017. The source has since received the following approvals:

- (a) Part 70 Administrative Amendment No.: 033-39426-00017, issued on February 16, 2018

County Attainment Status

The source is located in DeKalb 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 15, 2015, for the 2012 annual PM _{2.5} standard.
PM _{2.5}	Unclassifiable or attainment effective December 13, 2009, for the 2006 24-hour PM _{2.5} standard.
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Unclassifiable or attainment effective January 29, 2012, for the 2010 NO ₂ standard.
Pb	Unclassifiable or attainment effective December 31, 2011, for the 2008 lead standard.
¹ Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005.	

- (a) **Ozone Standards**
Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to ozone. DeKalb 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}**
DeKalb 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
DeKalb 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 2-2-1(ff)(1), 326 IAC 2-3-2(g), or 326 IAC 2-7-1(22)(B), 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 no longer require PSD or Title V permits for sources "previously classified as 'Major' based solely on greenhouse gas emissions."

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

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	Source-Wide Emissions Before Modification (ton/year)								
	PM	PM ₁₀ *	PM _{2.5} **	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
¹ Surface Coating Booths SB-1 and SB-2	6.04	6.04	6.04	0.00	0.00	240	0.00	78.25	27.78 MIBK
¹ Nine (9) Molding Presses	0.00	0.00	0.00	0.00	0.00		0.00	69.00	69.00 Styrene
One (1) Boiler (BLRA) (based on worst case of fuel)	0.526	0.625	0.560	11.20	5.26	0.202	3.03	0.068	0.065 Hexane
One (1) Boiler (BLRB) (based on worst case of fuel)	0.263	0.313	0.280	5.60	2.63	0.101	1.51	0.034	0.032 Hexane
Trimmers (Router 1 & 2)	29.57	29.57	29.57	0.00	0.00	0.000	0.00	0.00	NA
Degreaser	0.00	0.00	0.00	0.00	0.00	0.088	0.00	0.00	NA
Combustion	0.312	1.25	1.25	0.10	18.53	0.96	13.96	0.338	0.295 Hexane
Total PTE of Entire Source	36.70	37.79	37.70	16.89	26.42	241.36	18.51	147.55	69.03 Styrene
Title V Major Source Thresholds	NA	100	100	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	NA	NA

negl. = negligible
 * Under the Part 70 Permit program (40 CFR 70), PM₁₀ and PM_{2.5}, not particulate matter (PM), are each considered as a regulated air pollutant".
 **PM_{2.5} listed is direct PM_{2.5}.
¹ Limited VOC PSD minor limit to render 326 IAC 2-2 not applicable. Pursuant to 326 IAC 6-3-2, the particulate dry filters for the surface coating line shall be in operation at all times the surface coating line is in operation. Therefore, the potential to emit PM, P₁₀, and PM_{2.5} is after controls. This also renders 326 IAC 2-2 not applicable for PM, PM₁₀ and PM_{2.5}.

- (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 and equal to or greater than twenty-five (25) tons per year for a combination of HAPs. Therefore, this source is a major source under Section 112 of the Clean Air Act (CAA).
- (c) These emissions are based on the TSD of Part 70 Administrative Amendment No.: 033-39426-00017, issued on February 2, 2018.

Description of Proposed Modification

The Office of Air Quality (OAQ) has reviewed an application, submitted by Ashley Industrial Molding on September 5, 2018, relating to the addition of a robotic router, used while finishing molded parts prior to

painting, and a new dust collector for particulate control. The following is a list of the proposed emission unit and pollution control device:

One (1) robotic router, identified as CNC 12, approved in 2018 for construction, used while finishing molded parts prior to painting, with a nominal throughput of 10.4 parts per hour, using a dust collector, identified as DC09, for particulate control, and exhausting to the atmosphere.

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 and 326 IAC 2-7-11. 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
Router (CNC 12)	29.04	29.04	29.04	-	-	-	-	-	-
Total:	29.04	29.04	29.04						

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

(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 at greater than or equal to twenty-five (25) tons per year.

(b) Approval to Operate

Pursuant to 326 IAC 2-7-12(d)(1), this change to the permit is being made through a Significant Permit Modification because this modification makes a significant change to existing monitoring conditions.

Permit Level Determination – PSD or Emission Offset

The table below summarizes the after issuance source-wide potential to emit, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of the Part

70 source and/or permit modification, and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/ Emission Unit	Source-Wide Emissions after Modification (ton/year)								
	PM	PM ₁₀ *	PM _{2.5} **	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
¹ Surface Coating Booths SB-1 and SB-2	6.04	6.04	6.04	0.00	0.00	240	0.00	78.25	27.78 MIBK
¹ Nine (9) Molding Presses	0.00	0.00	0.00	0.00	0.00		0.00	69.00	69.00 Styrene
One (1) Boiler (BLRA) (based on worst case of fuel)	0.526	0.625	0.560	11.20	5.26	0.202	3.03	0.068	0.065 Hexane
One (1) Boiler (BLRB) (based on worst case of fuel)	0.263	0.313	0.280	5.60	2.63	0.101	1.51	0.034	0.032 Hexane
Trimmers (Router 1 & 2)	29.57	29.57	29.57	0.00	0.00	0.000	0.00	0.00	NA
Router (CNC 12)	29.04	29.04	29.04	-	-	-	-	-	-
Degreaser	0.00	0.00	0.00	0.00	0.00	0.088	0.00	0.00	NA
Combustion	0.312	1.25	1.25	0.10	18.53	0.96	13.96	0.338	0.295 Hexane
Total PTE of Entire Source	65.74	66.83	66.74	16.89	26.42	241.36	18.51	147.55	69.03 Styrene
Title V Major Source Thresholds	NA	100	100	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	NA	NA
negl. = negligible * Under the Part 70 Permit program (40 CFR 70), PM10 and PM2.5, not particulate matter (PM), are each considered as a regulated air pollutant". **PM _{2.5} listed is direct PM _{2.5} . ¹ Limited VOC PSD minor limit to render 326 IAC 2-2 not applicable. Pursuant to 326 IAC 6-3-2, the particulate dry filters for the surface coating line shall be in operation at all times the surface coating line is in operation. Therefore, the potential to emit PM, P10, and PM2.5 is after controls. This also renders 326 IAC 2-2 not applicable for PM, PM10 and PM2.5.									

- (a) This existing minor PSD stationary source will continue to be minor under 326 IAC 2-2 because the emissions of each PSD regulated pollutant will continue to be less than the PSD major source thresholds. 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) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this proposed modification.

National Emission Standards for Hazardous Air Pollutants (NESHAP):

- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (40 CFR Part 63, 326 IAC 14, and 326 IAC 20) included in the permit for this proposed modification.

Compliance Assurance Monitoring (CAM):

- (a) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to each existing pollutant-specific emission unit that meets the following criteria:
 - (1) has a potential to emit before controls equal to or greater than the major source threshold for the regulated pollutant involved;
 - (2) is subject to an emission limitation or standard for that pollutant (or a surrogate thereof); and
 - (3) uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.
- (b) 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.
- (c) 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.
- (d) 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)
Router (CNC 12)/ PM*	Y	326 IAC 6-3-2	<100	-	N ¹	
Router (CNC 12)/ PM10	Y	N	-	-	N	
Router (CNC 12)/ PM2.5	Y	N	-	-	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. Under the Part 70 Permit program (40 CFR 70), PM is not a regulated pollutant.						
PM* For limitations under 326 IAC 6-3-2, 326 IAC 6.5, and 326 IAC 6.8, IDEM OAQ uses PM as a surrogate for the regulated air pollutant PM10. Therefore, uncontrolled PTE and controlled PTE reflect the emissions of the regulated air pollutant PM10.						
N ¹ CAM does not apply for PM because the uncontrolled PTE of PM is less than the major source threshold.						
Controls: BH = Baghouse, C = Cyclone, DC = Dust Collection System, RTO = Regenerative or Recuperative Thermal Oxidizer, WS = Wet Scrubber, ESP = Electrostatic Precipitator						

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

State Rule Applicability Determination

Due to the modification at this source, state rule applicability 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 the router, CNC 12, will emit less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year for a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

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.

Robotic Router

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

Pursuant to 326 IAC 6-3-1(a), the requirements of 326 IAC 6-3-2 are applicable to the robotic router, identified as CNC 12, since part trimming is a manufacturing process not exempted from this rule under 326 IAC 6-3-1(b) and the robotic router is not subject to a particulate matter limitation that is as stringent as or more stringent than the particulate limitation established in this rule as specified in 326 IAC 6-3-1(c).

Pursuant to 326 IAC 6-3-2, the allowable particulate matter shall not exceed the following pound per hour limits listed in the table below:

Process / Emission Unit	P (ton/hr)	E (lb/hr)
Robotic Router, CNC 12 / Dust Collector DC09	0.3484	2.02

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

The uncontrolled particulate emissions of the robotic router are 6.63 lbs/hour, and cannot comply with the limit of 2.02 lbs per hour without the use of control. The dust collector, DC09, shall be in operation at all times the abrasive blasting process is in operation, in order to comply with this limit.

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:

There are no compliance testing requirements included in this modification.

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

Summary of Monitoring Requirements			
Emission Unit/Control	Stack	Operating Parameters	Frequency
Router (CNC 12)/ DC09	Exhausting to Atmosphere	Visible emissions from dust collector exhaust	Once per day

These monitoring conditions are necessary because the dust collector, identified as DC09, for the robotic router, identified as CNC 12, must operate properly to assure compliance with 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes).

Proposed Changes

The following changes listed below are due to the proposed modification. Deleted language appears as ~~strikethrough~~ text and new language appears as **bold** text:

(1) 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) surface coating line, consisting of two (2) surface coating booths, with a total nominal throughput of 45.4 gallons of coating per hour:

...

(n) One (1) robotic router, identified as CNC 12, approved in 2018 for construction, used while finishing molded parts prior to painting, with a nominal throughput of 10.4 parts per hour, using a dust collector, identified as DC09, for particulate control, and exhausting to the atmosphere.

(2) SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(m) Two (2) trimmers, identified as Router 1 and Router 2, used while finishing molded parts prior to painting, installed at separate times after 1980, each with a nominal throughput of 10 parts per hour, venting to a shared dust collector for particulate matter control, exhausting to atmosphere.

(n) **One (1) robotic router, identified as CNC 12, approved in 2018 for construction, used while finishing molded parts prior to painting, with a nominal throughput of 10.4 parts per hour, using a dust collector, identified as DC09, for particulate control, and exhausting to the atmosphere.**

Insignificant Activities:

(a) Three (3) cold cleaner covered degreasers, each constructed after July 1, 1990, used for maintenance purposes, with a nominal annual material usage of 8.76 gallons per year, each. Each degreaser is equipped with a remote solvent reservoir. [326 IAC 8-3-2][326 IAC 8-3-8]

(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.3.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate ~~emission rate from each of the two (2) trimmers (Router 1 and Router 2) shall not exceed 0.805 pounds per hour when operating at a process weight rate of 176 pounds per hour. emissions shall be limited as follows:~~

Process	Control	Process Weight Rate (tons/hour)	PM (lb/hour)
Trimmer (Router 1)	Dust Collector	0.088	0.805
Trimmer (Router 2)	Dust Collector	0.088	0.805
Router (CNC 12)	Dust Collector; DC09	0.3484	2.02

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

A Preventive Maintenance Plan is required for the two (2) trimmers (Router 1 and Router 2) and their control device, **and the router identified as CNC 12, and its dust collector DC9.** Section B - Preventive Maintenance Plan contains the Permittee's obligations with regard to the Preventive Maintenance Plan required by this condition.

...

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

D.3.5 Particulate Control

- (a) In order to comply with Condition D.3.1, the dust collector for particulate control **for the two (2) trimmers, identified as Router 1 and Router 2**, shall be in operation and control emissions from the two (2) trimmers at all times the trimmers are in operation.
- (b) **In order to comply with Condition D.3.1, the dust collector for particulate control for the robotic router, identified as CNC 12, shall be in operation and control emissions from the router at all times the router is in operation.**

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

D.3.6 Visible Emissions Notations

- (a) Daily visible emission notations of the dust collector ~~exhaust~~ **exhausts** shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

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

D.3.7 Record Keeping Requirements

- (b) To document the compliance status with Condition D.3.6, the Permittee shall maintain records of daily visible emission notations of the dust collector ~~exhaust~~ **exhausts**. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g., the process did not operate that day).

...

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 September 5, 2018.

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Source Modification No. 033-40422-00017. The operation of this proposed modification shall be subject to the conditions of the attached Significant Permit Modification No.: 033-40672-00017 .

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

IDEM Contact

- (a) If you have any questions regarding this permit, please contact Jeries Smirat, Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251, or by telephone at (317) 234-5374 or (800) 451-6027, and ask for Jeries Smirat or (317) 234-5374.
- (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 Air Permits page on the Internet at: <http://www.in.gov/idem/airquality/2356.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

Appendix A: Emissions Summary

Company Name: Ashley Industrial Molding, Inc.
 Address City IN Zip: 310 South Wabash Avenue, Ashley, IN 46703
 Significant Source Modification No.: 033-40422-00017
 Significant Permit Modification No.: 033-40672-00017
 Reviewer: Jeries Smirat

Uncontrolled Potential

Emission Unit	Pollutant (tons/year)						
	PM	PM ₁₀	PM _{2.5}	SO ₂	NO _x	VOC	CO
Surface Coating Booths SB-1 and SB-2	399	399	399	0.00	0.00	786	0.00
Nine (9) Molding Machines	0.00	0.00	0.00	0.00	0.00	69	0.00
One (1) Boiler (BLRA)							
Natural Gas	0.07	0.27	0.27	0.02	3.61	0.20	3.03
#2 Fuel Oil	0.53	0.63	0.56	11.20	5.26	0.09	1.31
Worst Case	0.53	0.63	0.56	11.20	5.26	0.20	3.03
One (1) Boiler (BLRB)							
Natural Gas	0.03	0.14	0.14	0.01	1.80	0.10	1.51
#2 Fuel Oil	0.26	0.31	0.28	5.60	2.63	0.04	0.66
Worst Case	0.26	0.31	0.28	5.60	2.63	0.10	1.51
Trimmers (Router 1 & 2)	29.57	29.57	29.57	0.00	0.00	0.00	0.00
Router (CNC 12)	29.04	29.04	29.04	0.00	0.00	0.00	0.00
Insignificant Activities (Degreasers)	0.00	0.00	0.00	0.00	0.00	0.09	0.00
Insignificant Activities (Combustion)	0.31	1.25	1.25	0.10	18.53	0.96	13.96
Total	458.9	459.9	459.8	16.89	26.4	856.3	18.5

Uncontrolled Potential

Emission Unit	HAPs (tons/year)										
	Arsenic	Benzene	Beryllium	Cadmium	Chromium	Dichloro-benzene	Ethyl-benzene	Formaldehyde	Glycol Ethers	Hexamethylene Diisocyanate	Hexane
Surface Coating Booths SB-1 and SB-2	0.00	0.00	0.00	0.00	0.00	0.00	24.13	0.00	73.9	0.669	0.00
Nine (9) Molding Machines	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
One (1) Boiler (BLRA)											
Natural Gas	0.00	0.0001	0.00	0.00004	0.0001	0.00004	0.00	0.003	0.00	0.00	0.065
#2 Fuel Oil	0.0001	0.00	0.0001	0.0001	0.0001	0.0001	0.00	0.00	0.00	0.00	0.00
Worst Case	0.0001	0.0001	0.0001	0.0001	0.0001	0.00004	0.00	0.003	0.00	0.00	0.065
One (1) Boiler (BLRB)											
Natural Gas	0.00	0.00004	0.00	0.00002	0.00003	0.00002	0.00	0.001	0.00	0.00	0.032
#2 Fuel Oil	0.00007	0.00	0.00006	0.00006	0.00006	0.00	0.00	0.00	0.00	0.00	0.00
Worst Case	0.00007	0.00004	0.00006	0.00006	0.00006	0.00002	0.00	0.001	0.00	0.00	0.032
Trimmers (Router 1 & 2)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Router (CNC 12)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Insignificant Activities (Degreasers)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Insignificant Activities (Combustion)	0.00	0.0006	0.00	0.0002	0.0002	0.0002	0.00	0.040	0.00	0.00	0.296
Total	0.0002	0.0007	0.0002	0.0003	0.0004	0.0003	24.13	0.04	73.95	0.67	0.39

Uncontrolled Potential

Emission Unit	HAPs (tons/year)										
	Lead	Manganese	Mercury	MIBK	Nickel	Selenium	Styrene	Toluene	Toluene- 2,4-diisocyanate	Xylene	Total
Surface Coating Booths SB-1 and SB-2	0.00	0.00	0.00	105.5	0.00	0.00	0.00	89.1	2.509	96.3	297.2
Nine (9) Molding Machines	0.00	0.00	0.00	0.00	0.00	0.00	0.00	69	0.00	0.00	69
One (1) Boiler (BLRA)											
Natural Gas	0.00002	0.00001	0.00	0.00	0.0001	0.00	0.00	0.0001	0.00	0.00	0.068
#2 Fuel Oil	0.0003	0.0002	0.0001	0.00	0.0001	0.0006	0.00	0.00	0.00	0.00	0.002
Worst Case	0.0003	0.0002	0.0001	0.00	0.0001	0.0006	0.00	0.0001	0.00	0.00	0.068
One (1) Boiler (BLRB)											
Natural Gas	0.00001	0.00001	0.00	0.00	0.00004	0.00	0.00	0.0001	0.00	0.00	0.034
#2 Fuel Oil	0.0002	0.0001	0.0001	0.00	0.0001	0.0003	0.00	0.00	0.00	0.00	0.0009
Worst Case	0.0002	0.0001	0.0001	0.00	0.0001	0.0003	0.00	0.0001	0.00	0.00	0.034
Trimmers (Router 1 & 2)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Router (CNC 12)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Insignificant Activities (Degreasers)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.000
Insignificant Activities (Combustion)	0.00008	0.00006	0.00	0.00	0.0003	0.00	0.00	0.0008	0.00	0.00	0.338
Total	0.0006	0.0004	0.0002	105.49	0.0005	0.0008	68.85	89.14	2.51	96.28	366.46

Appendix A: Emissions Summary

Company Name: Ashley Industrial Molding, Inc.
 Address City IN Zip: 310 South Wabash Avenue, Ashley, IN 46703
 Administrative Amendment No.: 033-39426-00017
 Reviewer: Jeries Smirat

Potential Emissions After Control

Emission Unit	Pollutants (tons/year)							HAPs (tons/year)							Total
	PM	PM ₁₀	PM _{2.5}	SO ₂	NO _x	VOC	CO	Ethyl-benzene	Glycol Ethers	MIBK	Styrene	Toluene	Xylene	Toluene- 2,4-diisocyanate	
Surface Coating Booths SB-1 and SB-2	19.96	19.96	19.96	0.00	0.00	786	0.00	24.13	73.9	105.5	0.00	89.1	96.3	2.51	297.2
Nine (9) Molding Machines	0.00	0.00	0.00	0.00	0.00	69	0.00	0.00	0.00	0.00	69	0.00	0.00	0.00	69
One (1) Boiler (BLRA) (worst case)	0.526	0.625	0.560	11.20	5.26	0.198	3.03	0.00	0.00	0.00	0.00	0.0001	0.00	0.00	0.068
One (1) Boiler (BLRB) (worst case)	0.263	0.313	0.28	5.60	2.63	0.099	1.51	0.00	0.00	0.00	0.00	0.0001	0.00	0.00	0.034
Trimmers (Router 1 & 2)	29.57	29.57	29.57	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Router (CNC 12)	29.04	29.04	29.04	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Insignificant Activities (Degreasers)	0.00	0.00	0.00	0.00	0.00	0.088	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Insignificant Activities (Combustion)	0.31	1.25	1.25	0.10	18.53	0.96	13.96	0.00	0.00	0.00	0.00	0.0008	0.00	0.00	0.338
Total	79.66	80.75	80.65	16.9	26.4	856	18.5	24.13	73.9	105.5	69	89.1	96.3	2.51	366.46

Insignificant individual HAPs are shown in the uncontrolled potential summary table.

Limited/Controlled Potential to Emit

Emission Unit	Pollutants (tons/year)							HAPs (tons/year)							Total
	PM	PM ₁₀	PM _{2.5}	SO ₂	NO _x	VOC	CO	Ethyl-benzene	Glycol Ethers	MIBK	Styrene	Toluene	Xylene	Toluene- 2,4-diisocyanate	
¹ Surface Coating Booths SB-1 and SB-2*	6.04	6.04	6.04	0.00	0.00	240.0	0.00	6.35	19.47	27.78	0.18	23.47	25.35	0.66	78.25
¹ Nine (9) Molding Machines	0.00	0.00	0.00	0.00	0.00		0.00	0.00	0.00	0.00	69	0.00	0.00	0.00	69
One (1) Boiler (BLRA) (worst case)	0.526	0.625	0.560	11.20	5.26	0.202	3.03	0.00	0.00	0.00	0.00	0.0001	0.00	0.00	0.068
One (1) Boiler (BLRB) (worst case)	0.263	0.313	0.280	5.60	2.63	0.101	1.51	0.00	0.00	0.00	0.00	0.0001	0.00	0.00	0.034
Trimmers (Router 1 & 2)	29.57	29.57	29.57	0.00	0.00	0.000	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Router (CNC 12)	29.04	29.04	29.04	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Insignificant Activities (Degreasers)	0.00	0.00	0.00	0.00	0.00	0.088	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Insignificant Activities (Combustion)	0.312	1.25	1.25	0.10	18.53	0.96	13.96	0.00	0.00	0.00	0.00	0.0008	0.00	0.00	0.338
Total	65.74	66.83	66.74	16.89	26.42	241.36	18.51	6.35	19.47	27.78	69.03	23.47	25.35	0.66	147.55

Insignificant individual HAPs are shown in the uncontrolled potential summary table.

* Pursuant to 326 IAC 8-1-6 (BACT), the combined VOC emissions from the surface coating booths (SB-1 and SB-2) shall not exceed 207 tons per year.
¹326 IAC 2-2 PSD Minor VOC limits

**Appendix A: Emissions Calculations
Potential VOC and Particulate Emissions
from Surface Coating Operations**

Company Name: **Ashley Industrial Molding, Inc.**
Address City IN Zip: **310 South Wabash Avenue, Ashley, IN 46703**
Significant Source Modification No.: **033-40422-00017**
Significant Permit Modification No.: **033-40672-00017**
Reviewer: **Jeries Smirat**

Prime Booth (SB-1) and Topcoat Booth (SB-2)*																
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)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	VOC pounds per hour	VOC pounds per day	VOC tons per year	Particulate (ton/yr)	lb VOC/gal solids	Transfer Efficiency *
SB-1																
E67AC17 Primer	9.49	37.0%	0.00%	37.0%	0.00%	25.0%	45.40	1.00	3.51	3.51	159.4	3,826	698	297	14.0	75.0%
E75AC601 Primer	9.42	32.0%	0.00%	32.0%	0.00%	56.0%	45.40	1.00	3.01	3.01	136.9	3,284	599	318	5.38	75.0%
E75D2301 Primer	9.43	32.0%	0.00%	32.0%	0.00%	55.0%	45.40	1.00	3.02	3.02	137.0	3,288	600	319	5.49	75.0%
SB-2																
F63GC32 (JD Green)	8.22	43.0%	0.00%	43.0%	0.00%	49.0%	45.40	1.00	3.53	3.53	160.5	3,851	703	233	7.21	75.0%
F63B70 (Buck Brown)	11.47	30.0%	0.00%	30.0%	0.00%	53.0%	45.40	1.00	3.44	3.44	156.2	3,749	684	399	6.49	75.0%
PPE0003 (Toyota Orange)	9.12	43.0%	0.00%	43.0%	0.00%	45.0%	45.40	1.00	3.92	3.92	178.0	4,273	780	258	8.71	75.0%
KAA0045 (Toyota Grey)	9.97	37.0%	0.00%	37.0%	0.00%	48.0%	45.40	1.00	3.69	3.69	167.5	4,019	734	312	7.69	75.0%
F63LC45 (NH Blue)	8.23	44.0%	0.00%	44.0%	0.00%	49.0%	45.40	1.00	3.62	3.62	164.4	3,946	720	229	7.39	75.0%
F63BC67 (NH Black)	10.39	33.0%	0.00%	33.0%	0.00%	51.0%	45.40	1.00	3.43	3.43	155.7	3,736	682	346	6.72	75.0%
F63R64 (Terra Cotta)	8.41	43.0%	0.00%	43.0%	0.00%	49.0%	45.40	1.00	3.62	3.62	164.2	3,940	719	238	7.38	75.0%
F63LC53 (New Blue)	8.20	44.0%	0.00%	44.0%	0.00%	49.0%	45.40	1.00	3.61	3.61	163.8	3,931	717	228	7.36	75.0%
Solvents																
SP74 (Purge Solvent)	6.81	10.0%	0.00%	10.0%	0.00%	0.00%	2.10	1.00	0.68	0.68	1.43	34.32	6.26	0.00	0.00	100%

PM Control Efficiency: 95.0%

* SB-1 and SB-2 utilize HVLP applicators.

Add worst case coating to all solvents
Worst case and solvent emissions are in **bold**

Total Uncontrolled	179.5	4,307.3	786.1	399.1
Total Controlled	179.5	4,307.3	786.1	20.0
Limited PTE			207.0	120.75
Limited/Controlled PTE			207.0	6.04

METHODOLOGY

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

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

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

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

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

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

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

Total = Worst Coating + Sum of all solvents used

Controlled Particulate Potential Tons per Year = Particulate Potential Tons per Year * (1 - % PM Control Efficiency)

326 IAC 8-1-6 BACT VOC limit (tons/yr) = 207.0

Limited Particulate PTE (ton/yr) = Density of F63B70 Buck Brown (lb/gal) * [Limited VOC (ton/yr) / (Pounds VOC per gallon of F63B70 Buck Brown (lb/gal) / 2,000 (lb/ton))] * (1-Weight % Volatile of F63B70 Buck Brown) * (1-Transfer efficiency) * (1 ton/2000 lbs)

Limited/Controlled Particulate Potential Tons per Year = Limited Particulate PTE * (1 - % PM Control Efficiency)

**Appendix A: Emission Calculations
Potential HAP Emissions
from Surface Coating Operations SB-1 and SB-2**

Company Name: **Ashley Industrial Molding, Inc.**
Address City IN Zip: **310 South Wabash Avenue, Ashley, IN 46703**
Significant Source Modification No.: **033-40422-00017**
Significant Permit Modification No.: **033-40672-00017**
Reviewer: **Jeris Smirat**

Prime Booth (SB-1) and Topcoat Booth (SB-2)																		
Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Ethyl Benzene	Weight % Glycol Ethers	Weight % MIBK	Weight % Hexamethylene Diisocyanate	Weight % Toluene	Weight % Xylene	Weight % Toluene-2,4-diisocyanate	Ethyl-benzene Emissions (ton/yr)	Glycol Ethers Emissions (ton/yr)	MIBK Emissions (ton/yr)	Hexamethylene Diisocyanate Emissions (ton/yr)	Toluene Emissions (ton/yr)	Xylene Emissions (ton/yr)	Toluene-2,4-diisocyanate Emissions (ton/yr)	Total
SB-1																		
E67AC17 Primer	9.49	45.40	1.00	0.00%	2.10%	5.59%	0.00%	1.40%	1.40%	0.03%	0.00	39.63	105.49	0.00	26.42	26.42	0.57	198.52
E75AC601 Primer	9.42	45.40	1.00	0.00%	2.38%	1.84%	0.00%	0.89%	0.00%	0.00%	0.00	44.58	34.47	0.00	16.67	0.00	0.00	95.72
E75D2301 Primer	9.43	45.40	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
SB-2																		
F63GC32 (JD Green)	8.22	45.40	1.00	1.33%	0.00%	5.85%	0.04%	5.07%	5.89%	0.00%	21.74	0.00	95.62	0.65	82.87	96.28	0.00	297.16
F63B70 (Buck Brown)	11.47	45.40	1.00	0.00%	0.00%	0.00%	0.00%	3.63%	1.52%	0.11%	0.00	0.00	0.00	0.00	82.79	34.67	2.51	119.97
PPE0003 (Toyota Orange)	9.12	45.40	1.00	0.58%	3.75%	0.00%	0.00%	0.00%	2.88%	0.00%	10.52	68.01	0.00	0.00	0.00	52.23	0.00	130.76
KAA0045 (Toyota Grey)	9.97	45.40	1.00	0.00%	3.73%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	73.95	0.00	0.00	0.00	0.00	0.00	73.95
F63LC45 (NH Blue)	8.23	45.40	1.00	1.47%	0.00%	3.93%	0.04%	5.36%	5.24%	0.00%	24.06	0.00	64.32	0.65	87.72	85.76	0.00	262.50
F63BC67 (NH Black)	10.39	45.40	1.00	0.61%	0.00%	4.59%	0.02%	2.07%	2.17%	0.00%	12.60	0.00	94.83	0.41	42.77	44.83	0.00	195.45
F63R64 (Terra Cotta)	8.41	45.40	1.00	1.44%	0.00%	3.85%	0.04%	5.33%	5.13%	0.00%	24.08	0.00	64.39	0.67	89.14	85.79	0.00	264.06
F63LC53 (New Blue)	8.2	45.40	1.00	1.48%	0.00%	3.95%	0.04%	5.37%	5.26%	0.00%	24.13	0.00	64.41	0.65	87.56	85.77	0.00	262.52
Solvents																		
SP74 (Purge Solvent)	6.8	2.10	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Worst Case											24.13	73.95	105.49	0.67	89.14	96.28	2.51	297.16
Limited PTE											6.35	19.47	27.78	0.18	23.47	25.35	0.66	78.25

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

Limited HAP emissions proportionately adjusted based on BACT VOC limit: 207/786.1 = 0.263331

**Appendix A: Emissions Calculations
Potential VOC, HAP and Particulate
from Closed Molding Operations**

**Company Name: Ashley Industrial Molding, Inc.
Address City IN Zip: 310 South Wabash Avenue, Ashley, IN 46703
Significant Source Modification No.: 033-40422-00017
Significant Permit Modification No.: 033-40672-00017
Reviewer: Jeries Smirat**

Nine (9) Molding Machines										
Emission Unit	Weight % Monomer	Usage (lb/hour)	Flash Off* %	VOC Emissions (lb/hour)	VOC Emissions (lb/day)	VOC Emissions (ton/year)	% VOC (as Styrene)	Styrene Emissions (ton/yr)	Particulate Emissions (ton/yr)	Transfer Efficiency
PR-440 (Installed prior to 1980)	25.0%	86	1.50%	0.32	7.7	1.41	100%	1.41	0.00	100%
PR-651 (Installed prior to 1980)	25.0%	12	1.50%	0.05	1.08	0.20	100%	0.20	0.00	100%
PR-845 (Installed prior to 1980)	25.0%	195	1.50%	0.73	17.6	3.20	100%	3.20	0.00	100%
PR-1039 (Installed prior to 1980)	25.0%	545	1.50%	2.04	49.1	9.0	100%	9.0	0.00	100%
PR-1056 (Installed in 1986)	25.0%	545	1.50%	2.04	49.1	9.0	100%	9.0	0.00	100%
PR-2053 (Installed prior to 1980)	25.0%	454	1.50%	1.70	40.9	7.5	100%	7.5	0.00	100%
PR-2560 (Installed in 1984)	25.0%	627	1.50%	2.35	56	10.3	100%	10.3	0.00	100%
PR-3038 (Installed prior to 1980)	25.0%	1098	1.50%	4.12	99	18.0	100%	18.0	0.00	100%
PR-2561 (Installed in 2005)	25.0%	630	1.50%	2.36	57	10.3	100%	10.3	0.00	100%

Pollutant	Total Emissions		
	(lb/hour)	(lb/day)	(ton/year)
Particulate:	0.00	0.00	0.00
VOC:	15.7	377	69
HAP (Styrene):	15.7	377	69

*Emission factor for compression molding of sheet molding compound from American National Standards Institute (ANSI/ACMA/ICPA UEF-1-2011a).

METHODOLOGY

Potential VOC Pounds per Hour = Pounds of material used for each part * Parts per hour * monomer content * flash off

Potential VOC Tons per Year = Potential VOC Pounds per hour * 8760 hrs/yr / 2000 lbs/ton

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

Styrene Potential Tons per Year = VOC tons per year * % VOC that is Styrene

Potential HAP Tons per Year = Styrene tons per year

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

**Company Name: Ashley Industrial Molding, Inc.
Address City IN Zip: 310 South Wabash Avenue, Ashley, IN 46703
Significant Source Modification No.: 033-40422-00017
Significant Permit Modification No.: 033-40672-00017
Reviewer: Jeries Smirat**

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
8.40	72.1

	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	0.07	0.27	0.27	0.02	3.61	0.20	3.03

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

	HAPs - 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	7.575E-05	4.328E-05	2.705E-03	6.493E-02	1.226E-04

	HAPs - 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	1.804E-05	3.968E-05	5.050E-05	1.371E-05	7.575E-05

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

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

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
Natural Gas Combustion Only: Boiler B
MM BTU/HR <100**

**Company Name: Ashley Industrial Molding, Inc.
Address City IN Zip: 310 South Wabash Avenue, Ashley, IN 46703
Significant Source Modification No.: 033-40422-00017
Significant Permit Modification No.: 033-40672-00017
Reviewer: Jeries Smirat**

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
4.20	36.1

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	0.03	0.14	0.14	0.01	1.80	0.10	1.51

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

Emission Factor in lb/MMcf	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	3.787E-05	2.164E-05	1.353E-03	3.246E-02	6.132E-05

Emission Factor in lb/MMcf	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	9.018E-06	1.984E-05	2.525E-05	6.853E-06	3.787E-05

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

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

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
Commercial/Institutional/Residential Combustors (< 100 mmBtu/hr)
Boiler A: #1 and #2 Fuel Oil

Company Name: Ashley Industrial Molding, Inc.
Address City IN Zip: 310 South Wabash Avenue, Ashley, IN 46703
Significant Source Modification No.: 033-40422-00017
Significant Permit Modification No.: 033-40672-00017
Reviewer: Jeries Smirat

Heat Input Capacity MMBtu/hr	Potential Throughput kgals/year	S = Weight % Sulfur 0.3
8.4	525.6	

Emission Factor in lb/kgal	Pollutant						
	PM*	PM10	direct PM2.5	SO2	NOx	VOC	CO
	2.0	2.4	2.1	42.6 (142.0S)	20.0	0.34	5.0
Potential Emission in tons/yr	0.526	0.625	0.560	11.195	5.256	0.089	1.314

Emission Factor in lb/mmBtu	HAPs - Metals				
	Arsenic	Beryllium	Cadmium	Chromium	Lead
	4.0E-06	3.0E-06	3.0E-06	3.0E-06	9.0E-06
Potential Emission in tons/yr	1.47E-04	1.10E-04	1.10E-04	1.10E-04	3.31E-04

Emission Factor in lb/mmBtu	HAPs - Metals (continued)			
	Mercury	Manganese	Nickel	Selenium
	3.0E-06	6.0E-06	3.0E-06	1.5E-05
Potential Emission in tons/yr	1.10E-04	2.21E-04	1.10E-04	5.52E-04

Weight % Sulfur of 0.3% has been used because the source wanted to use what was listed as the default in the current Form PI-02F instructions. There is no significant change in PTE.

Methodology

1 gallon of No. 2 Fuel Oil has a heating value of 140,000 Btu

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.140 MM Btu

Emission Factors are from AP 42, Tables 1.3-1, 1.3-2, 1.3-3, 1.3-8, and 1.3-12 (SCC 1-03-005-01/02/03) Supplement E 9/98 Corrected 05/10 (see erata file)

*PM emission factor is filterable PM only. Condensable PM emission factor is 1.3 lb/kgal.

Emission (tons/yr) = Throughput (kgals/ yr) x Emission Factor (lb/kgal)/2,000 lb/ton

No data was available in AP-42 for organic HAPs.

Potential HAP Emissions (tons/year) = Throughput (mmBtu/hr)*Emission Factor (lb/mmBtu)*8,760 hrs/yr / 2,000 lb/ton

Appendix A: Emissions Calculations
Commercial/Institutional/Residential Combustors (< 100 mmBtu/hr)
Boiler B: #1 and #2 Fuel Oil

Company Name: Ashley Industrial Molding, Inc.
Address City IN Zip: 310 South Wabash Avenue, Ashley, IN 46703
Significant Source Modification No.: 033-40422-00017
Significant Permit Modification No.: 033-40672-00017
Reviewer: Jeries Smirat

Heat Input Capacity MMBtu/hr	Potential Throughput kgals/year	S = Weight % Sulfur <input type="text" value="0.3"/>
<input type="text" value="4.2"/>	262.8	

Emission Factor in lb/kgal	Pollutant						
	PM*	PM10	direct PM2.5	SO2	NOx	VOC	CO
	2.0	2.4	2.1	42.6 (142.0S)	20.0	0.34	5.0
Potential Emission in tons/yr	0.263	0.313	0.280	5.598	2.628	0.045	0.657

Emission Factor in lb/mmBtu	HAPs - Metals				
	Arsenic	Beryllium	Cadmium	Chromium	Lead
	4.0E-06	3.0E-06	3.0E-06	3.0E-06	9.0E-06
Potential Emission in tons/yr	7.36E-05	5.52E-05	5.52E-05	5.52E-05	1.66E-04

Emission Factor in lb/mmBtu	HAPs - Metals (continued)			
	Mercury	Manganese	Nickel	Selenium
	3.0E-06	6.0E-06	3.0E-06	1.5E-05
Potential Emission in tons/yr	5.52E-05	1.10E-04	5.52E-05	2.76E-04

Weight % Sulfur of 0.3% has been used because the source wanted to use what was listed as the default in the current Form PI-02F instructions. There is no significant change in PTE.

Methodology

1 gallon of No. 2 Fuel Oil has a heating value of 140,000 Btu

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.140 MM Btu

Emission Factors are from AP 42, Tables 1.3-1, 1.3-2, 1.3-3, 1.3-8, and 1.3-12 (SCC 1-03-005-01/02/03) Supplement E 9/98 Corrected 05/10 (see erata file)

*PM emission factor is filterable PM only. Condensable PM emission factor is 1.3 lb/kgal.

Emission (tons/yr) = Throughput (kgals/ yr) x Emission Factor (lb/kgal)/2,000 lb/ton

No data was available in AP-42 for organic HAPs.

Potential HAP Emissions (tons/year) = Throughput (mmBtu/hr)*Emission Factor (lb/mmBtu)*8,760 hrs/yr / 2,000 lb/ton

**Appendix A: Emissions Calculations
Particulate Emissions from Trimmers**

Company Name: Ashley Industrial Molding, Inc.
Address City IN Zip: 310 South Wabash Avenue, Ashley, IN 46703
Significant Source Modification No.: 033-40422-00017
Significant Permit Modification No.: 033-40672-00017
Reviewer: Jeries Smirat

Unit	Part	Trimming Loss per Part (lb)	Number of Parts per Hour	Number of Parts per Day	Trim Loss per Day (lb)	Weight of Floor Sweepings per Day (lb)*	Uncontrolled PM PTE to Baghouse (tpy)*
Router 1	Part 988	0.5	10	240	120	39.00	14.78
Router 2	Part 988	0.5	10	240	120	39.00	14.78
CNC 12	Part 609	0.95	10.4	249.60	237.12	78.00	29.04
Total							58.60

Per source, trimming loss calculated by weighing the worst case part before and after trimming

Initial Weight of Part	Weight After Trimming**	Trimming Loss per Part (lb)
17.6	17.1	0.5
67	66.05	0.95

** calculated based on measurements taken by facility

Methodology

Weight of Floor Sweepings represent particulate >100 microns

PTE Before Controls (tons/yr) = (Trim Loss (lbs/day) - Floor Sweepings (lb/day)) x 365 (days/yr) / 2000 (lbs/ton)

*PM =PM10/PM2.5

326 IAC 6-3-2 allowable emissions

Emission Unit	Process Weight Rate (tons/hour)*	Maximum Allowable Emission Rate (lbs/hour)	Maximum Allowable Emission Rate (tons/yr)
Trimmer (Router 1)	0.088	0.805	3.52
Trimmer (Router 2)	0.088	0.805	3.52
Router (CNC 12)	0.3484	2.023	8.86

*minimum based on 326 IAC 6-3-2(e)(2)

Methodology

Max Allow Emission Rate (tons/yr) = 4.10*(Process Weight rate (tons/hr)^{0.67})*8760 hr/2000lbs

based on formula $E = 4.10 P^{0.67}$

where E = rate of emission in pounds per hour; and

P = process weight rate in tons per hour

**Appendix A: Emissions Calculations
Three (3) insignificant parts degreasers**

Company Name: Ashley Industrial Molding, Inc.
Address City IN Zip: 310 South Wabash Avenue, Ashley, IN 46703
Significant Source Modification No.: 033-40422-00017
Significant Permit Modification No.: 033-40672-00017
Reviewer: Jeries Smirat

Volatile Organic Compound (VOC) Emissions

Material/Solvent	Process Unit	Density (lb/gal)	Nominal Annual Material Usage (gal/yr)*	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non Volatiles (Solids)	Potential VOC (tons/yr)
Mineral Spirits (Naphtha)	Safety Kleen Premium Gold Solvent degreaser 1	6.70	8.76	100%	0%	100%	0%	0%	0.03
Mineral Spirits (Naphtha)	Safety Kleen Premium Gold Solvent degreaser 2	6.70	8.76	100%	0%	100%	0%	0%	0.03
Mineral Spirits (Naphtha)	Safety Kleen Premium Gold Solvent degreaser 3	6.70	8.76	100%	0%	100%	0%	0%	0.03
Total									0.09

Notes:

Potential emissions are based on rated capacity of 8,760 hours/year.

* Nominal Annual Material Usage (gal/yr) provided by the source

Methodology:

Estimated Daily Material Usage Rate (gal/day) = Nominal Annual Material Usage (gal/yr) / 365 (days/yr)

Potential VOC (lb/hr) = [Nominal Annual Material Usage (gal/yr) x Density (lb/gal)] / 8760 (hrs/yr)

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

Potential VOC (tons/yr) = [Nominal Annual Material Usage (gal/yr) * Density (lbs/gal)] / 2000 (lbs/ton)

Based on MSDS submitted by the source, solvent does not contain any HAPs.

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

Company Name: Ashley Industrial Molding, Inc.
 Address City IN Zip: 310 South Wabash Avenue, Ashley, IN 46703
 Significant Source Modification No.: 033-40422-00017
 Significant Permit Modification No.: 033-40672-00017
 Reviewer: Jeries Smirat

Unit	Heat Input Capacity
Air Make-Up 60K	3.75
Air Make-Up 100K	9.72
Air Make-Up 30K	2.64
One Water Heater #2	3.8
One Water Heater #3	3.8
Topcoat Bake Oven	2.50
Dry-Off Oven	2.20
Air Make-Up 45K	3.23
Air Make-Up 25K-1	0.25
Air Make-Up 25K-2	0.27
two (2) shipping warehouse space heaters	0.49
Door #7 space heater	0.99
Door #31 space heater	0.99
three (3) shipping warehouse catalytic heaters	0.18
Air Make-Up 30K	3.00
RO Water Area catalytic heater	0.03
Six (6) Paint Department catalytic heaters	0.26
Furnace - main breakroom and overhead offices	0.10
Furnace - front office	0.06

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
38.25	328.5

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	0.31	1.25	1.25	0.10	16.43	0.90	13.80

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

Emission Factor in lb/MMcf	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	3.449E-04	1.971E-04	1.232E-02	2.957E-01	5.585E-04

Emission Factor in lb/MMcf	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	8.213E-05	1.807E-04	2.300E-04	6.242E-05	3.449E-04

Total HAPs	0.31
Worst HAP	0.30

Hexane

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

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

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: Emission Calculations
Reciprocating Internal Combustion Engines - Natural Gas
4-Stroke Lean-Burn (4SLB) Engines
Insignificant Emergency Generators (Paint & Main)**

**Company Name: Ashley Industrial Molding, Inc.
Address City IN Zip: 310 South Wabash Avenue, Ashley, IN 46703
Significant Source Modification No.: 033-40422-00017
Significant Permit Modification No.: 033-40672-00017
Reviewer: Jeries Smirat**

Nominal Output Horsepower Rating (hp)	275	Unit	Heat Input Capacity (hp)
Brake Specific Fuel Consumption (BSFC) (Btu/hp-hr)	7500		
Maximum Hours Operated per Year (hr/yr)	500	Generator - Paint	198
Potential Fuel Usage (MMBtu/yr)	1032	Generator - Main	77.3
High Heat Value (MMBtu/MMscf)	1020		
Potential Fuel Usage (MMcf/yr)	1.01		

Criteria Pollutants	Pollutant						
	PM*	PM10*	PM2.5*	SO2	NOx	VOC	CO
Emission Factor (lb/MMBtu)	7.71E-05	9.99E-03	9.99E-03	5.88E-04	4.08E+00	1.18E-01	3.17E-01
Potential Emissions (tons/yr)	0.00004	0.005	0.005	0.0003	2.11	0.06	0.16

*PM emission factor is for filterable PM-10. PM10 emission factor is filterable PM10 + condensable PM.
PM2.5 emission factor is filterable PM2.5 + condensable PM.

Hazardous Air Pollutants (HAPs)

Pollutant	Emission Factor (lb/MMBtu)	Potential Emissions (tons/yr)
Acetaldehyde	8.36E-03	0.004
Acrolein	5.14E-03	0.003
Benzene	4.40E-04	0.000
Biphenyl	2.12E-04	0.000
1,3-Butadiene	2.67E-04	0.000
Formaldehyde	5.28E-02	0.027
Methanol	2.50E-03	0.001
Hexane	1.10E-03	0.001
Toluene	4.08E-04	0.000
2,2,4-Trimethylpentane	2.50E-04	0.000
Xylene	1.84E-04	0.000
Total		0.04

HAP pollutants consist of the eleven highest HAPs included in AP-42 Table 3.2-2.

Methodology

Emission Factors are from AP-42 (Supplement F, July 2000), Table 3.2-2

Potential Fuel Usage (MMBtu/yr) = [Nominal Output Horsepower Rating (hp)] * [Brake Specific Fuel Consumption (Btu/hp-hr)] * [Maximum Hours Operated per Year (hr/yr)] / [1000000 Btu/MMBtu]

Potential Emissions (tons/yr) = [Potential Fuel Usage (MMBtu/yr)] * [Emission Factor (lb/MMBtu)] / [2000 lb/ton]

Abbreviations

PM = Particulate Matter
PM10 = Particulate Matter (<10 um)
SO2 = Sulfur Dioxide
NOx = Nitrous Oxides
VOC - Volatile Organic Compounds
CO = Carbon Monoxide



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

December 4, 2018

Catherine Mowery
Ashley Industrial Molding, Inc.
P.O. Box 398
Ashley, Indiana 46705

Re: Public Notice
Ashley Industrial Molding, Inc.
Permit Level: Title V SSM (Minor PSD) and
Title V SPM
Permit Number: 033-40422-00017 and
033-40672-00017

Dear Miss Mowery:

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

The Office of Air Quality (OAQ) has prepared two versions of the Public Notice Document. The abbreviated version will be published in the newspaper, and the more detailed version will be made available on the IDEM's website and provided to interested parties. Both versions are included for your reference. The OAQ has requested that the *Auburn Evening Star* in Auburn, Indiana publish the abbreviated version of the public notice no later than December 7, 2018. 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 Grant Township Public Library, 300 South Wayne Street in Waterloo, Indiana. As a reminder, you are obligated by 326 IAC 2-1.1-6(c) to place a copy of the complete permit application at this library no later than ten (10) days after submittal of the application or additional information to our department. We highly recommend that even if you have already placed these materials at the library, that you confirm with the library that these materials are available for review and request that the library keep the materials available for review during the entire permitting process.

Please review the enclosed documents carefully. This is your opportunity to comment on the draft permit and notify the OAQ of any corrections that are needed before the final decision. Questions or comments about the enclosed documents should be directed to Jeries Smirat, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension 4-5374 or dial (317) 234-5374.

Sincerely,

John F. Jackson

John F. Jackson
Permit Branch
Office of Air Quality

Enclosures
PN Applicant Cover Letter 1/9/2017



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Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING

December 4, 2018

Auburn Evening Star
118 West Ninth Street
Auburn, Indiana 46706

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for Ashley Industrial Molding, Inc., De Kalb 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 December 7, 2018.

Please send the invoice, notarized form, clippings showing the date of publication to Bo Liu, at the Indiana Department of Environmental Management, Accounting, Room N1340, 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 John Jackson at 800-451-6027 and ask for extension 3-1449 or dial 317-233-1449.

Sincerely,

John F. Jackson

John F. Jackson
Permit Branch
Office of Air Quality

Permit Level: Title V significant Source Modification (Minor PSD) and
Title V Significant Permit Modification

Permit Number: 033-40422-00017 and 033-40672-00017

Enclosure

PN Newspaper Letter 8/22/2018



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Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

December 4, 2018

To: Grant Township Public Library

From: Jenny Acker, Branch Chief
Permits Branch
Office of Air Quality

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

Applicant Name: Ashley Industrial Molding, Inc.
Permit Number: 033-40422-00017 and 033-40672-00017

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 1/9/2017



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

Notice of Public Comment

December 4, 2018
Ashley Industrial Molding, Inc.
033-40422-00017 and 033-40672-00017

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 Letter 1/9/2017



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Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

AFFECTED STATE NOTIFICATION OF PUBLIC COMMENT PERIOD DRAFT INDIANA AIR PERMIT

December 4, 2018

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

Permit Number: 033-40422-00017 & 033-40672-00017
Applicant Name: Ashley Industrial Molding, Inc.
Location: Ashley, De Kalb 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 1/9/2017

Mail Code 61-53

IDEM Staff	JJACKSON 12/4/2018	ASHLEY INDUSTRIAL MOLDING INC 033-40422-00017 & 033-40672-00017 (draft)
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
		AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handling 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		Catherine Mowery ASHLEY INDUSTRIAL MOLDING INC PO Box 398 Ashley IN 467050398 (Source CAATS)										
2		Scott Pflughoeft ASHLEY INDUSTRIAL MOLDING INC PO Box 398 Ashley IN 467050398 (RO CAATS)										
3		Mr. Steve Roosz NISWMD 2320 W 800 S, P.O. Box 370 Ashley IN 46705 (Affected Party)										
4		Ms. Diane Leroy 303 N. Jackson St. Auburn IN 46706 (Affected Party)										
5		Mr. Barry Fordanish R#3 1480 CR 66 Auburn IN 46706 (Affected Party)										
6		DeKalb County Health Department 220 E 7th St #110 Auburn IN 46706 (Health Department)										
7		Daniel & Sandy Trimmer 15021 Yellow River Road Columbia City IN 46725 (Affected Party)										
8		Brown & Sons Fuel Co. P.O. Box 665 Kendallville IN 46755 (Affected Party)										
9		Waterloo Grant TWP Public Library 300 S. Wayne St., P.O. Box 707 Waterloo IN 46793-4491 (Library)										
10		Mr. Marty K. McCurdy 2550 County Road 27 Waterloo IN 46793 (Affected Party)										
11		Ashley Town Council P.O. Box 70 Ashley IN 46705 (Local Official)										
12		Ms. Jaime K. Saylor Hatchett & Hauck LLP 150 West Market Street, Suite 200 Indianapolis IN 46204 (Attorney)										
13		Nucor Building Products 305 Industrial Parkway Waterloo IN 46793 (Affected Party)										
14		DeKalb County Building Department 301 S Union St Auburn IN 46706 (Local Official)										
15		Lisa Green The Journal Gazette 600 W Main St Fort Wayne IN 46802 (Affected Party)										

Total number of pieces Listed by Sender	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)
<p>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 mail 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 insured and COD mail. See International Mail Manual for limitations of coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.</p>		