

**PART 70 OPERATING PERMIT  
and ENHANCED NEW SOURCE REVIEW  
OFFICE OF AIR MANAGEMENT**

**Fiber-Tron, Inc.  
29877 US 33 West  
Elkhart, Indiana 46516**

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

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 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T039-6337-00152	
Issued by: Felicia R. George, Assistant Commissioner Office of Air Management	Issuance Date:

## SECTION A

## SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). 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(15)]

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The Permittee owns and operates a stationary van and recreational vehicle fiberglass parts manufacturing source.

Responsible Official: Bill McCaslin  
Source Address: 29877 US 33 West, Elkhart, Indiana 46516  
Mailing Address: 29877 US 33 West, Elkhart, Indiana 46516  
SIC Code: 3714  
County Location: Elkhart  
County Status: Attainment for all criteria pollutants  
Source Status: Part 70 Permit Program  
Minor Source, under PSD Rules;  
Major Source, Section 112 of the Clean Air Act

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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

- (a) One (1) gel resin coating station, identified as SG1, using a maximum of 30 pounds of gel resin per hour, equipped with an air-assisted airless spray application system containing one (1) spray gun and a dry filter for particulate matter overspray control, exhausting at one (1) stack identified as S1;
- (b) One (1) lamination station, identified as SG2, using a maximum of 234.5 pounds of fiberglass chop resin per hour, equipped with an air-assisted airless spray application system containing two (2) fiberglass chop resin spray guns and a dry filter for particulate matter overspray control, exhausting at one (1) stack identified as S2;
- (c) One (1) paint spray booth, identified as SG3, coating a maximum of 1.6 fiberglass running board sets per hour, equipped with an high volume low pressure (HVLP) spray application system and a dry filter for particulate matter overspray control, exhausting at one (1) stack identified as S3; and
- (d) One (1) trimming station rated at 247 pounds of fiberglass product per hour, equipped with two (2) hand-held trimming wheels and one (1) baghouse identified as DC-1 for particulate matter control, exhausting at one (1) stack identified as PM-1.

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

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This stationary source does not currently have any insignificant activities, as defined in 326 IAC 2-7-1 (21) that have applicable requirements.

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

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

**SECTION B GENERAL CONDITIONS**

**B.1 Permit No Defense [326 IAC 2-1-10] [IC 13]**

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- (a) Indiana statutes from IC 13 and rules from 326 IAC, quoted 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.
- (b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-1-3.2 or 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled "Permit Shield."

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

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

**B.3 Permit Term [326 IAC 2-7-5(2)]**

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This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

**B.4 Enforceability [326 IAC 2-7-7(a)]**

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

**B.5 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]**

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

**B.6 Severability [326 IAC 2-7-5(5)]**

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

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

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

B.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:
- Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015
- (b) The Permittee shall furnish to IDEM, OAM, within a reasonable time, any information that IDEM, OAM 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.
- (c) Upon request, the Permittee shall also furnish to IDEM, OAM copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAM along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit constitutes a violation of the Clean Air Act and is grounds for:
- (1) Enforcement action;
  - (2) Permit termination, revocation and reissuance, or modification; or
  - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]

- (a) Any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

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

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

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

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, OAM on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
- (1) The identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was based on continuous or intermittent data;
  - (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3);
  - (5) Any insignificant activity that has been added without a permit revision; and
  - (6) Such other facts, as specified in Sections D of this permit, as IDEM, OAM, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]  
[326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, 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;
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP 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 Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM.

B.13 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or 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, OAM 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 Management,  
Compliance Section), or  
Telephone Number: 317-233-5674 (ask for Compliance Section)  
Facsimile Number: 317-233-5967

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted notice, either in writing or facsimile, of the emergency to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

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

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

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

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (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) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
  - (e) IDEM, OAM may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(9) be revised in response to an emergency.
  - (f) Failure to notify IDEM, OAM by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
  - (g) Operations may continue during an emergency only if the following conditions are met:
    - (1) 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.
    - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
      - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

- (B) Continued operation of the facilities is 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.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

**B.14 Permit Shield [326 IAC 2-7-15]**

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- (a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.
- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:
- (1) The applicable requirements are included and specifically identified in this permit; or
- (2) The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.
- (c) 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, including any term or condition from a previously issued construction or operation permit, IDEM, OAM 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.
- (d) 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.
- (e) 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.
- (f) 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).
- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM, has issued the modifications. [326 IAC 2-7-12(c)(7)]

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

B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation.

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
  - (2) An emergency as defined in 326 IAC 2-7-1(12); or
  - (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
  - (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination  
[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 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)]
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM 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, OAM 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, OAM at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

**B.18 Permit Renewal [326 IAC 2-7-4]**

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- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, 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(40).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
- (1) A timely renewal application is one that is:
    - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
    - (B) 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, OAM on or before the date it is due. [326 IAC 2-5-3]
  - (2) If IDEM, OAM, upon receiving a timely and complete 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.

- (c) **Right to Operate After Application for Renewal** [326 IAC 2-7-3]  
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, OAM 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 in writing by IDEM, OAM, any additional information identified as being needed to process the application.
- (d) **United States Environmental Protection Agency Authority** [326 IAC 2-7-8(e)]  
If IDEM, OAM fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

**B.19 Permit Amendment or Modification** [326 IAC 2-7-11] [326 IAC 2-7-12]

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- (a) The Permittee must comply with 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  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015  
  
Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule.
- (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

**B.20 Permit Revision Under Economic Incentives and Other Programs** [326 IAC 2-7-5(8)]  
[326 IAC 2-7-12 (b)(2)]

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

**B.21 Changes Under Section 502(b)(10) of the Clean Air Act** [326 IAC 2-7-20(b)]

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The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:

- (a) For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.

- (b) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).

B.22 Operational Flexibility [326 IAC 2-7-20]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), 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 approval required by 326 IAC 2-1 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under 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  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

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 which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

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

- (b) 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 by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]  
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAM, 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.23 Construction Permit Requirement [326 IAC 2]

Except as allowed by Indiana P.L. 130-1996 Section 12, as amended by P.L. 244-1997, modification, construction, or reconstruction shall be approved as required by and in accordance with 326 IAC 2.

B.24 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM, 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) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.  
[326 IAC 2-7-6(6)]
  - (1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM, or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAM, nor an authorized representative, may disclose the information unless and until IDEM, OAM, makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]

- (2) The Permittee, *and* IDEM, OAM, acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

**B.25 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-7-11]**

Pursuant to 326 IAC 2-1-6 and 326 IAC 2-7-11:

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch within thirty (30) days of the change. Notification shall include a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the Permittee and the new owner.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11. The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) IDEM, OAM shall reserve the right to issue a new permit.

**B.26 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]**

- (a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAM the applicable fee is due April 1 of each year.
- (b) 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 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

**B.27 Enhanced New Source Review [326 IAC 2]**

The requirements of the construction permit rules in 326 IAC 2 are satisfied by this permit for any previously unpermitted facilities and facilities to be constructed within eighteen (18) months after the date of issuance of this permit, as listed in Sections A.2 and A.3.

**SECTION C SOURCE OPERATION CONDITIONS**

Entire Source

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

**C.1 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]**

- (a) The total source potential emissions of volatile organic compounds (VOC) are less than 250 tons per 365 consecutive day period. Therefore the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.
- (b) Any change or modification which may increase potential emissions to 250 tons per twelve (12) consecutive month period, from this source, shall cause this source to be considered a major source under PSD, 326 IAC 2-2 and 40 CFR 52.21, and shall require approval from IDEM, OAM prior to making the change.

**C.2 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]**

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Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

**C.3 Opacity [326 IAC 5-1]**

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Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), 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.4 Open Burning [326 IAC 4-1] [IC 13-17-9]**

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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. 326 IAC 4-1-3 (a) (2)(A) and (B) are not federally enforceable.

**C.5 Incineration [326 IAC 4-2][326 IAC 9-1-2]**

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The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.

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

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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.7 Operation of Equipment [326 IAC 2-7-6(6)]**

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All air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission unit vented to the control equipment is in operation.

**C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]**

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- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
  - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

- (2) If there is a change in the following:
  - (A) Asbestos removal or demolition start date;
  - (B) Removal or demolition contractor; or
  - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**  
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Indiana Accredited Asbestos Inspector**  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

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

#### **C.9 Performance Testing [326 IAC 3-6]**

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- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

#### **C.10 Compliance Schedule [326 IAC 2-7-6(3)]**

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The Permittee:

- (a) Has certified that all facilities at this source are in compliance with all applicable requirements; and
- (b) Has submitted a statement that the Permittee will continue to comply with such requirements; and
- (c) Will comply with such applicable requirements that become effective during the term of this permit.

#### **C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**

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Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee may extend compliance schedule an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

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 the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

#### **C.12 Maintenance of Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]**

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- (a) In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour until such time as the continuous monitor is back in operation.
- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

**C.13 Monitoring Methods [326 IAC 3]**

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Any monitoring or testing performed to meet the applicable requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

**C.14 Pressure Gauge Specifications**

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Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ( $\pm 2\%$ ) of full scale reading.

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

**C.15 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]**

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

(a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

within ninety (90) days after the date of issuance of this permit.

The ERP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) If the ERP is disapproved by IDEM, OAM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

(d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

(e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

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

C.16 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present in a process in more than the threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

- (a) Submit:
  - (1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
  - (2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
  - (3) A verification to IDEM, OAM that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.
- (b) Provide annual certification to IDEM, OAM that the Risk Management Plan is being properly implemented.

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.17 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5][326 IAC 2-7-6] [326 IAC 1-6]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
  - (1) This condition;
  - (2) The Compliance Determination Requirements in Section D of this permit;
  - (3) The Compliance Monitoring Requirements in Section D of this permit;
  - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
  - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :
    - (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and

- (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
  - (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;
  - (3) An automatic measurement was taken when the process was not operating; or
  - (4) The process has already returned to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

C.18 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]  
[326 IAC 2-7-6]

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- (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 take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

**C.19 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]**

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- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
  - (1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
  - (2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:

Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015
- (c) The annual emission statement 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, OAM on or before the date it is due.

**C.20 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]**

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- (a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.

- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.21 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM representative. 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 written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
  - (1) The date, place, and time of sampling or measurements;
  - (2) The dates analyses were performed;
  - (3) The company or entity performing the analyses;
  - (4) The analytic techniques or methods used;
  - (5) The results of such analyses; and
  - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
  - (1) Copies of all reports required by this permit;
  - (2) All original strip chart recordings for continuous monitoring instrumentation;
  - (3) All calibration and maintenance records;
  - (4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

**C.22 General Reporting Requirements [326 IAC 2-7-5(3)(C)]**

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- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported.
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015
- (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, OAM on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period.
- (e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports.
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**Stratospheric Ozone Protection**

**C.23 Compliance with 40 CFR 82 and 326 IAC 22-1**

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

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

## SECTION D.1 FACILITY OPERATION CONDITIONS

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

- (a) One (1) gel resin coating station, identified as SG1, using a maximum of 30 pounds of gel resin per hour, equipped with an air-assisted airless spray application system containing one (1) spray gun and a dry filter for particulate matter overspray control, exhausting at one (1) stack identified as S1;
- (b) One (1) lamination station, identified as SG2, using a maximum of 234.5 pounds of fiberglass chop resin per hour, equipped with an air-assisted airless spray application system containing two (2) fiberglass chop resin spray guns and a dry filter for particulate matter overspray control, exhausting at one (1) stack identified as S2;
- (c) One (1) paint spray booth, identified as SG3, coating a maximum of 1.6 fiberglass running board sets per hour, equipped with an high volume low pressure (HVLP) spray application system and a dry filter for particulate matter overspray control, exhausting at one (1) stack identified as S3; and
- (d) One (1) trimming station rated at 247 pounds of fiberglass product per hour, equipped with two (2) hand-held trimming wheels and one (1) baghouse identified as DC-1 for particulate matter control, exhausting at one (1) stack identified as PM-1.

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

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

Pursuant to 326 IAC 8-1-6 (New Facilities: General Reduction Requirements), the best available control technology (BACT) for gel resin coating station SG1 and lamination station SG2 shall be as follows:

- (a) The gel resin spraying at station SG1 shall utilize an air-assisted airless spray application system.
- (b) The fiberglass chop resin spraying at station SG2 shall utilize an air-assisted airless spray application system.
- (c) Only non-VOC containing solvents shall be used at stations SG1 and SG2.

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

The volatile organic compounds (VOC) input to paint spray booth SG3, including VOC solvent usage, minus the VOC solvent shipped out, shall be limited to less than 25 tons per twelve (12) consecutive month period. Therefore, the best available control technology (BACT) requirement in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) shall not apply to facility SG3.

#### D.1.3 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), particulate matter emissions shall be limited as follows:

- (a) The particulate matter as overspray from gel resin coating station SG1, lamination station SG2, and paint spray booth SG3 shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

or

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

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour.}$$

- (b) The allowable PM emission rate from the trimming station shall not exceed 1.01 pounds per hour when operating at a process weight rate of 247.14 pounds per hour.

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

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

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

#### D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

### **Compliance Determination Requirements**

#### D.1.5 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test these facilities by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the volatile organic compound limits specified in Conditions D.1.1 and D.1.2, and the particulate matter limits specified in D.1.3, shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

#### D.1.6 Volatile Organic Compounds (VOC)

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) using formulation data supplied by the coating manufacturer. IDEM, OAM reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

#### D.1.7 VOC Emissions

Compliance with Condition D.1.2 shall be demonstrated at the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

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

### **D.1.8 Particulate Matter (PM)**

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- (a) The dry filters for PM control shall be in operation at all times when the three (3) surface coating facilities (SG1, SG2 and SG3) are in operation.
- (b) The baghouse for PM control shall be in operation at all times when the trimming station is in operation and exhausting to the outside atmosphere.

### **D.1.9 Monitoring**

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- (a) Daily inspections shall be performed to verify the integrity of the particle collection waterwash systems. To monitor the performance of the waterwash systems, weekly observations shall be made of the overspray from the surface coating booth stacks (S1, S2, S3) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for the units shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

### **D.1.10 Visible Emissions Notations**

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- (a) Daily visible emission notations of the trimming station baghouse exhaust 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 for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

#### D.1.11 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the trimming station, at least once daily when the trimming station is in operation when exhausting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouse shall be maintained such that the pressure drop is not less than 2.4 inches of water, or within a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

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

#### D.1.12 Broken or Failed Bag Detection

In the event that bag failure has been observed.

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

#### D.1.13 Record Keeping Requirements

- (a) To document compliance with Condition D.1.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.2.
  - (1) The amount and VOC content of each coating 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 and those used as cleanup solvents;
  - (2) A log of the dates of use;
  - (3) The volume weighted VOC content of the coatings used for each month;
  - (4) The cleanup solvent usage for each month;
  - (5) The total VOC usage for each month; and
  - (6) The weight of VOCs emitted for each compliance period.

- (b) To document compliance with Conditions D.1.8(a) and D.1.9, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) To document compliance with Conditions D.1.8(b) and D.1.10, the Permittee shall maintain records of daily visible emission notations of the trimming station baghouse exhaust.
- (d) To document compliance with Condition D.1.11, the Permittee shall maintain the following:
  - (1) Daily records of the following operational parameters during normal operation when exhausting to the atmosphere:
    - (A) Inlet and outlet differential static pressure; and
    - (B) Cleaning cycle: frequency and differential pressure.
  - (2) Documentation of all response steps implemented, per event .
  - (3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.
  - (4) Quality Assurance/Quality Control (QA/QC) procedures.
  - (5) Operator standard operating procedures (SOP).
  - (6) Manufacturer's specifications or its equivalent.
  - (7) Equipment "troubleshooting" contingency plan.
  - (8) Documentation of the dates vents are redirected.
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.1.14 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.2 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT  
CERTIFICATION**

Source Name: Fiber-Tron, Inc.  
Source Address: 29877 US 33 West, Elkhart, Indiana 46516  
Mailing Address: 29877 US 33 West, Elkhart, Indiana 46516  
Part 70 Permit No.: T039-6337-00152

**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:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) \_\_\_\_\_
- 9 Report (specify) \_\_\_\_\_
- 9 Notification (specify) \_\_\_\_\_
- 9 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:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION  
P.O. Box 6015  
100 North Senate Avenue  
Indianapolis, Indiana 46206-6015  
Phone: 317-233-5674  
Fax: 317-233-5967**

**PART 70 OPERATING PERMIT  
EMERGENCY/DEVIATION OCCURRENCE REPORT**

Source Name: Fiber-Tron, Inc.  
Source Address: 29877 US 33 West, Elkhart, Indiana 46516  
Mailing Address: 29877 US 33 West, Elkhart, Indiana 46516  
Part 70 Permit No.: T039-6337-00152

**This form consists of 2 pages**

**Page 1 of 2**

Check either No. 1 or No.2	
9 1.	This is an emergency as defined in 326 IAC 2-7-1(12)
C	The Permittee must notify the Office of Air Management (OAM), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
C	The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
9 2.	This is a deviation, reportable per 326 IAC 2-7-5(3)(c)
C	The Permittee must submit notice in writing within ten (10) calendar days

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/Deviation:
Describe the cause of the Emergency/Deviation:

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

Page 2 of 2

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

Form Completed by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION**

**Part 70 Quarterly Report**

Source Name: Fiber-Tron, Inc.  
Source Address: 29877 US 33 West, Elkhart, Indiana 46516  
Mailing Address: 29877 US 33 West, Elkhart, Indiana 46516  
Part 70 Permit No.: T039-6337-00152  
Facility: Paint spray booth SG3  
Parameter: Volatile organic compounds (VOC)  
Limit: less than 25 tons per twelve (12) consecutive months

Year: \_\_\_\_\_

<b>Month</b>	<b>VOC Usage this Month (tons)</b>	<b>VOC Usage Past 11 Months (tons)</b>	<b>Total VOC Usage 12 Months (tons)</b>

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
Title/Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
 OFFICE OF AIR MANAGEMENT  
 COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT  
 QUARTERLY COMPLIANCE MONITORING REPORT**

Source Name: Fiber-Tron, Inc.  
 Source Address: 29877 US 33 West, Elkhart, Indiana 46516  
 Mailing Address: 29877 US 33 West, Elkhart, Indiana 46516  
 Part 70 Permit No.: T039-6337-00152

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

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

**9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.**

**9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD:**

<b>Compliance Monitoring Requirement</b> (e.g. Permit Condition D.1.8)	<b>Number of Deviations</b>	<b>Date of each Deviation</b>

Form Completed By: \_\_\_\_\_  
 Title/Position: \_\_\_\_\_  
 Date: \_\_\_\_\_  
 Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

## Indiana Department of Environmental Management Office of Air Management

### Technical Support Document (TSD) for a Part 70 Operating Permit and Enhanced New Source Review (ENSR)

#### Source Background and Description

**Source Name:** Fiber-Tron, Inc.  
**Source Location:** 29877 US 33 West  
**County:** Elkhart, Indiana 46516  
**SIC Code:** 3714  
**Operation Permit No.:** T039-6337-00152  
**Permit Reviewer:** Michael Hirtler/EVP

The Office of Air Management (OAM) has reviewed a Part 70 and Enhanced New Source Review (ENSR) permit application from Fiber-Tron, Inc. relating to the operation of a van and recreational vehicle fiberglass parts manufacturing source.

#### Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (a) One (1) gel resin coating station, identified as SG1, using a maximum of 30 pounds of gel resin per hour, equipped with an air-assisted airless spray application system containing one (1) spray gun and a dry filter for particulate matter overspray control, exhausting at one (1) stack identified as S1 (note: this station was previously identified as B-1);
- (b) One (1) lamination station, identified as SG2, using a maximum of 234.5 pounds of fiberglass chop resin per hour, equipped with an air-assisted airless spray application system containing two (2) fiberglass chop resin spray guns and a dry filter for particulate matter overspray control, exhausting at one (1) stack identified as S2 (note: this station was previously identified as B-2); and
- (c) One (1) trimming station rated at 247 pounds of fiberglass product per hour, equipped with two (2) hand-held trimming wheels and one (1) baghouse, identified as DC-1, for particulate matter control, exhausting at one (1) stack identified as PM-1 (note: this station was previously identified as B-3).

#### Unpermitted Emission Units and Pollution Control Equipment

The source also consists of the following unpermitted facilities/units:

- (a) One (1) paint spray booth, identified as SG3, coating a maximum of 1.6 fiberglass running board sets per hour, equipped with a high volume low pressure (HVLP) spray application system and a dry filter for particulate matter overspray control, exhausting at one (1) stack identified as S3.

#### Emission Units and Pollution Control Equipment Under Enhanced New Source Review (ENSR)

All unpermitted emission units and pollution control equipment at the source are reviewed under the ENSR process.

There are no new emission units under ENSR during this review.

### **Insignificant Activities**

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units (Btu) per hour.
- (b) Volatile organic compound (VOC) or hazardous air pollutant (HAP) storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.
- (c) Application of oils, greases, lubricants or other nonvolatile materials applies as temporary protective coatings.
- (d) Solvent recycling systems with batch capacity less than or equal to 100 gallons.
- (e) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals measured at 38 degrees Celsius).

### **Existing Approvals**

The source has been operating under the following approvals:

- (a) Construction Permit CP039-2549-00152, issued on April 26, 1993.
- (b) Registered Operation and Construction Status CP039-3316-00152, issued January 5, 1994.

### **Enforcement Issue**

- (a) IDEM is aware that the unpermitted emission units and pollution control equipment listed above have been constructed and operated prior to receipt of the proper permit.
- (b) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

### **Recommendation**

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively incomplete Part 70 permit application for the purposes of this review was received on July 22, 1996. Additional information received on November 8, 1996 makes the Part 70 permit application administratively complete.

A notice of completeness letter was mailed to Fiber-Tron, Inc. on December 30, 1996.

Additional technical information was received on October 15 and October 31, 1997.

**Emission Calculations**

See Appendix A of this document for detailed emissions calculations for units covered under Enhanced New Source Review (two (2) pages).

**Potential Emissions**

Pursuant to 326 IAC 1-2-55, Potential Emissions are defined as “emissions of any one (1) pollutant which would be emitted from a facility, if that facility were operated without the use of pollution control equipment unless such control equipment is necessary for the facility to produce its normal product or is integral to the normal operation of the facility.”

Pollutant	Potential Emissions (tons/year)
PM	greater than 100, less than 250
PM-10	less than 100
SO <sub>2</sub>	less than 100
VOC	less than 100
CO	less than 100
NO <sub>x</sub>	less than 100

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential Emissions (tons/year)
xylene	less than 10
toluene	less than 10
ethyl benzene	less than 10
glycol ethers	less than 10
methanol	less than 10
methyl ethyl ketone (MEK)	less than 10
methyl isobutyl ketone (MIBK)	less than 10
methyl methacrylate	less than 10
styrene	greater than 10
TOTAL	greater than 25

- (a) The potential emissions (as defined in Indiana Rule) of any single HAP are equal to or greater than ten (10) tons per year and the potential emissions (as defined in Indiana Rule) of the combined HAPs are greater than or equal to twenty-five (25) tons per year. The potential emissions includes both permitted and unpermitted/Enhanced New Source Review emission units and pollution control equipment. Therefore, the source is subject to the provisions of 326 IAC 2-7.

**Actual Emissions**

The following table shows the actual emissions from the source. This information reflects the OAM 1996 emission data.

Pollutant	Actual Emissions (tons/year)
PM	<0.01
PM-10	<0.01
SO <sub>2</sub>	0.00
VOC	33.48
CO	0.00
NO <sub>x</sub>	0.00

styrene	29.75
methyl methacrylate	0.36
toluene	0.88
MEK	0.21
MIBK	0.03
glycol ethers	0.31
methanol	0.29
xylene	0.46
ethyl benzene	0.05

**Total Potential and Allowable Emissions For Units Covered Under Enhanced New Source Review**

Indiana Permit Allowable Emissions Definition for paint spray booth SG3 (after compliance with applicable rules, based on 8,760 hours of operation per year at rated capacity):

Pollutant	Allowable Emissions (tons/year)	Potential Emissions (tons/year)
Particulate Matter (PM)	---	4.6
Particulate Matter (PM10)	---	4.6
Sulfur Dioxide (SO <sub>2</sub> )	---	0
Volatile Organic Compounds (VOC)	---	25.6
Carbon Monoxide (CO)	---	0
Nitrogen Oxides (NO <sub>x</sub> )	---	0
Single Hazardous Air Pollutant (HAP)	---	4.7
Combination of HAPs	—	18.6

- (a) The potential emissions before control are the same as the allowable emissions, therefore, the potential emissions before control are used for the permitting determination. See attached spreadsheets (two pages) for detailed calculations.
- (b) Allowable emissions (as defined in the Indiana Rule) of VOC are greater than 25 tons per year. Therefore, pursuant to 326 IAC 2-1, Sections 1 and 3, a construction permit is required.

**Limited Potential to Emit**

The table below summarizes the total limited potential to emit (based on enforceable production limits):

Process/facility	Limited Potential to Emit (PTE) (tons/year)							
	PM	PM-10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	Single HAP	Total HAPs
Gel coating station SG1	0.1	0.1	0.0	20.5	0.0	0.0	18.9	20.5
Lamination station SG2	0.5	0.5	0.0	45.4	0.0	0.0	45.4	45.4
Trimming station	<0.1	<0.1	0.0	0.0	0.0	0.0	0.0	0.0
Paint spray booth SG3	0.2	0.2	0.0	24.0	0.0	0.0	4.7	18.0
<b>Total Emissions</b>	<b>0.9</b>	<b>0.9</b>	<b>0.0</b>	<b>89.9</b>	<b>0.0</b>	<b>0.0</b>	<b>69.0</b>	<b>83.9</b>

### County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
TSP	attainment
PM-10	attainment
SO <sub>2</sub>	attainment
NO <sub>2</sub>	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen are precursors for the formation of ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as attainment (maintenance) for ozone.

### Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

- (1) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.
- (2) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

### Federal Rule Applicability

- (a) There are no New Source Performance Standards (326 IAC 12), 40 CFR Part 60, applicable to this source.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR Part 63, applicable to this source.

### State Rule Applicability - Entire Source

326 IAC 2-2 and 40 CFR 52.21 (Prevention of Significant Deterioration, PSD)

Elkhart County has been classified as attainment or maintenance for the criteria pollutants. This source is not a major stationary source because no attainment pollutant is emitted at a rate of 250 tons per year or greater and the source is not in one of the 28 listed source categories. Therefore, pursuant to 326 IAC 2-2 and 40 CFR 52.21, the PSD requirements do not apply.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than ten (10) tons per year of volatile organic compounds and it is located in Elkhart County. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4.

The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

- (a) Visible emissions shall not exceed an average of forty percent (40%) opacity in twenty-four (24) consecutive readings as determined by 326 IAC 5-1-4,
- (b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

**State Rule Applicability - Individual Facilities**

326 IAC 2-1-3.4 (New Source Toxics Control)

Pursuant to 326 IAC 2-1-3.4 (New Source Toxics Control), any new process or production unit, which in and of itself emits or has the potential to emit (PTE) 10 tons per year of any HAP or 25 tons per year of the combination of HAPs, and is constructed or reconstructed after July 27, 1997, must be controlled using technologies consistent with Maximum Achievable Control Technology (MACT). Paint spray booth SG3, which is being reviewed under Enhanced New Source Review, was constructed prior to July 27, 1997. Also, the facility does not have a PTE more than 10 tons per year of a single HAP or 25 tons per year of total HAPs. Therefore, this spray booth is not subject to the requirements of 326 IAC 2-1-3.4.

326 IAC 6-3-2 (Process Operations)

Pursuant to 326 IAC 6-3-2 (Process Operations) the particulate matter (PM) overspray from gel resin coating station SG1, lamination station SG2 and paint spray booth SG3 shall be limited by the following:

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

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

or

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

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

The particulate matter emissions from each coating station shall comply with 326 IAC 6-3-2 by using dry filters for overspray control at all times when the coating stations are in operation.

326 IAC 6-3-2 (Process Operations)

Pursuant to 326 IAC 6-3-2 (Process Operations), particulate matter (PM) emitted from the trimming station shall be limited by the following equation when operating at a process weight rate of 247.14 pounds per hour (0.124 tons per hour):

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

$$E = 4.10 (0.124)^{0.67} = 1.01 \text{ pounds of PM per hour}$$

The trimming station is equipped with a baghouse for PM control. The maximum uncontrolled PM emission rate from the trimming station is 30.28 pounds per hour, and with a baghouse the maximum controlled PM emission rate from the trimming station is less than 0.01 pounds per hour. Therefore, the trimming station shall comply with 326 IAC 6-3-2 by using a baghouse for PM control at all times during operation.

### 326 IAC 8-1-6 (General Reduction Requirements)

Pursuant to CP039-2549-00152, issued on April 26, 1993, best available control technology (BACT) for gel resin coating station SG1 and lamination station SG2 has been determined to be the use of an air assisted airless spray application system at each station, along with the use of dibasic ester to partially replace acetone usage as a solvent. At the time that CP039-2549-00152 was issued, acetone was considered to be photochemically reactive and therefore a volatile organic compound pursuant to 326 IAC 1-2-90. However, since the issuance of CP039-2549-00152, the United States Environmental Protection Agency (USEPA) and IDEM have determined that acetone has negligible photochemical reactivity, resulting in its exclusion from the definition of VOC. Therefore, the use of dibasic ester instead of acetone is no longer required to satisfy BACT. Instead, BACT at gel resin coating station SG1 and lamination station SG2 shall be the use of air assisted airless spray application systems and non-VOC containing solvents. Both coating stations comply with these requirements.

Pursuant to 326 IAC 8-1-6, new facilities located anywhere in the state that were constructed on or after January 1, 1980, which have a potential to emit (PTE) VOC at 25 tons or more per year, and which are not otherwise regulated by another provision of Article 8, are subject to the rule requirements. Paint spray booth SG3 began fiberglass product coating operations during 1994. Since the facility has a PTE VOC in excess of 25 tons per year, it is subject to the requirements of 326 IAC 8-1-6. The paint spray booth will limit VOC input usage to 24 tons per year. Compliance with this limitation shall make the requirements of 326 IAC 8-1-6 not applicable to the facility. This VOC limit will also make the requirements of 326 IAC 2-2 (PSD) not applicable to paint spray booth SG3.

There are no other 326 IAC Article 8 rules applicable to this source.

### Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in permit Section D are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in permit Section D. 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.

The compliance monitoring requirements applicable to this source are as follows:

1. The gel resin coating station SG1, lamination station SG2, and paint spray booth SG3 have applicable compliance monitoring conditions as specified below:
  - (a) The gel resin spraying at station SG1 shall utilize an air-assisted airless spray application system.
  - (b) The fiberglass chop resin spraying at station SG2 shall utilize an air-assisted airless spray application system.
  - (c) Only non-VOC containing solvents shall be used in stations SG1 and SG2.
  - (d) The volatile organic compounds (VOC) input to paint spray booth SG3, including VOC solvent usage, minus the VOC solvent shipped out, shall be limited to 2.0 tons per month. Therefore, the best available control technology (BACT) requirement in 326 IAC 8-1-6 shall not apply to facility SG3.
  - (e) Quarterly reports shall be submitted to OAM Compliance Section. These reports shall include the total VOC input usage, minus the VOC solvent shipped out, for each month during the calendar quarter reported.

These monitoring conditions are necessary because the coating stations must operate properly to ensure compliance with 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) and 326 IAC 2-7 (Part 70).

2. The trimming station has applicable compliance monitoring conditions as specified below:
  - (a) Daily visible emissions notations of the trimming station baghouse exhaust shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. 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. 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. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.
  - (b) The Permittee shall record the total static pressure drop across the baghouse controlling the trimming station, at least once daily when the trimming station is in operation. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop across the baghouse shall be maintained such that the pressure drop is not less than 2.4 inches of water, or within a range established during the latest stack test.

The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the pressure reading is below the above mentioned value for any one reading.

These monitoring conditions are necessary because the baghouse for the trimming station must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

### Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 187 hazardous air pollutants set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Part 70 Application Form GSD-08.

- (a) This source will emit levels of air toxics greater than those that constitute major source applicability according to Section 112 of the Clean Air Act.
- (b) See attached calculations for detailed air toxic calculations for units covered under Enhanced New Source Review (see Appendix A, two (2) pages).

The concentrations of these air toxics were modeled and found to be (in the worst case possible) as follows: The concentrations of these air toxics were compared to the Permissible Exposure Limits (PEL) developed by the Occupational Safety and Health Administration (OSHA). The Office of Air Management (OAM) does not have at this time any specific statutory or regulatory authority over these substances.

Air Toxics Analysis

Pollutant	Rate (lb/hr)	Rate (ton/yr)	Modeled Conc. (Fg/m <sup>3</sup> )	OSHA PEL (Fg/m <sup>3</sup> )	% OSHA PEL
Styrene	14.68	64.28	1962.5	428,000	0.46%
Methyl Methacrylate	0.36	1.58	48.1	410,000	0.01%
Xylene	0.90	3.93	87.9	435,000	0.02%
Toluene	1.06	4.65	103.5	752,000	0.01%
MEK	0.15	0.66	14.6	590,000	0.00%
MIBK	0.18	0.77	17.6	410,000	0.00%
Glycol Ethers	0.87	3.82	84.9	125,000*	0.07%
Ethyl Benzene	0.09	0.40	8.8	435,000	0.00%

\* PEL for ethylene glycol used as default for this glycol ether.

### Conclusion

The operation of this van and recreational vehicle fiberglass parts manufacturing source shall be subject to the conditions of the attached proposed **Part 70 Permit No. T039-6337-00152**.

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

Addendum to the Technical Support Document  
for a Part 70 Operating Permit and  
Enhanced New Source Review (ENSR)

Source Name:	Fiber-Tron, Inc.
Source Location:	29877 US 33 West
County:	Elkhart, Indiana 46516
SIC Code:	3714
Operation Permit No.:	T039-6337-00152
Permit Reviewer:	Michael Hirtler/EVP

On January 2, 1998, the Office of Air Management (OAM) had a notice published in the Truth Publishing, Elkhart, Indiana, stating that Fiber-Tron, Inc. had applied for a Part 70 permit and Enhanced New Source Review (ENSR) for a van and recreational vehicle fiberglass parts manufacturing source. The notice also stated that OAM proposed to issue a permit for this installation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Upon further review, the OAM has decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted). The Table Of Contents has been modified to reflect these changes.

**Section A:**

1. Section A (Source Summary) has been revised to clarify that the description of the source in conditions A.1 through A.3 is informational only and does not constitute separately enforceable conditions. The descriptive information in other permit conditions is enforceable.

**SECTION A**

**SOURCE SUMMARY**

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) ~~and presented in the permit application.~~ **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.**

2. Condition A.5 (Prior Permit Conditions Superseded) has been deleted. Language has been added to B.14 (Permit Shield) to address the effect of prior permit conditions. U.S. EPA stated that it would object to any permit that contained such supersession language.

~~A.5 Prior Permit Conditions Superseded [326 IAC 2]~~

~~The terms and conditions of this permit incorporate all the current applicable requirements for all emission units located at this source, and supersede all terms and conditions in all registrations and permits, including construction permits, issued prior to the date of issuance of this permit. All terms and conditions in such registrations and permits are no longer in effect.~~

**Section B:**

1. Condition B.1(b) (Permit No Defense) has been revised to reference the permit shield condition that is found later in Section B.
  - (b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-1-3.2 or 326 IAC 2-7-15, **as set out in this permit in the Section B condition entitled "Permit Shield."**
2. Condition B.8 (c) (Duty to Supplement Information) has been revised to clarify how the Permittee may assert a claim that records are confidential information:
  - (c) Upon request, the Permittee shall also furnish to IDEM, OAM copies of records required to be kept by this permit. **If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, For information claimed to be confidential, the Permittee must shall furnish such records to IDEM, OAM along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must shall furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.**
3. Section B.11 (Annual Compliance Certification) has been revised. To match changes to the federal Part 70 rules, the language in (c)(3) has been revised since it appears to be a clarification rather than a change in the requirement. The language in (c)(5) has been added to clarify the treatment of insignificant activities. OAM is revising the nonrule policy document Air-007 NPD to provide more guidance regarding the annual compliance certification requirements for sources with Title V permits:

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

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

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

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, OAM on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
  - (1) The identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was **based on** continuous or intermittent **data**;
  - (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); ~~and~~
  - (5) **Any insignificant activity that has been added without a permit revision; and**
  - ~~(5)~~ (6) Such other facts, as specified in Sections D of this permit, as IDEM, OAM, may require to determine the compliance status of the source.

The ~~notification which shall be submitted~~ **submittal** by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- 4. Condition B.12 (a) (Preventive Maintenance Plan) has been revised to more closely match the language in 326 IAC 1-6-3. A provision allowing a one time extension of the time within which the Permittee must prepare and maintain the PMP has also been added to (a).

B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]  
[326 IAC 1-6-3]

- 
- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each **facility**:

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing ~~emission units and associated~~ emission control devices;
- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

**If due to circumstances beyond its control, the PMP 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 Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015**

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
  - (c) PMP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM.
5. Condition B.14 (Permit Shield) condition has been revised to clarify how the permit shield affects applicable requirements from previous permits and how the permit shield affects determinations that a specific requirement is not applicable to the source.

**B.14 Permit Shield [326 IAC 2-7-15]**

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**(a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.**

**(~~a~~) (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits.**

Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided ~~that either of the following:~~

- (1) The applicable requirements are included and specifically identified in this permit; **or**
- (2) ~~IDEM, OAM, in acting on the Part 70 permit application or revision, determines in writing that other requirements specifically identified are not applicable to the source, and the Part 70 permit includes the determination or a concise summary thereof.~~ **The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.**

- ~~(b)~~ **(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. 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, including any term or condition from a previously issued construction or operation permit, IDEM, OAM 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)~~ **(d)** ~~If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement, IDEM, OAM, 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. 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.~~
- ~~(d)~~ **(e)** 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)~~ **(f)** 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)~~ **(g)** This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- ~~(g)~~ **(h)** This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM, has issued the modification. [326 IAC 2-7-12(b)(8)]
6. Condition B.16 (Deviations from Permit Requirements and Conditions) has been revised to add the deviation terminology that had been contained in Section C, in the General Reporting Requirements condition:

**B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]**

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation.

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:**

- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or**
- (2) An emergency as defined in 326 IAC 2-7-1(12); or**
- (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.**
- (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.**

**A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.**

- ~~(b)~~ **(c)** Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. **The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).**

- ~~(c)~~ **(d)** Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

7. Condition B.18 (a) (Permit Renewal) has been changed as follows to clarify the treatment of certain trivial activities :

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, 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(40).**

8. Conditions B.19 (Administrative Permit Amendment), B.20 (Minor Permit Modification) , and B.21 (Significant Permit Modification) have all been combined into one condition numbered B.19 (Permit Amendment or Modification). Conditions B.20 and B.21 have been deleted. The new Condition B.19 ( Permit Amendment or Modification) will read as follows:

**B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]**

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(a) **The Permittee must comply with 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  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015**

**Any such application should be certified by the “responsible official” as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule.**

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

9. Condition B.26 (now B.24) (Inspection and Entry) has been revised to remove the requirement for an IDEM identification card, which other agencies do not have.

**B.264 Inspection and Entry [326 IAC 2-7-6(2)]**

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Upon presentation of ~~IDEM~~ **proper** identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM, 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) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.  
[326 IAC 2-7-6(6)]

**(1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM, or an authorized representative, contains information that is confidential under IC 5-14-3-4(a).**

**The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAM, nor an authorized representative, may disclose the information unless and until IDEM, OAM, makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]**

**(2) The Permittee, and IDEM, OAM, acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]**

10. Condition B.27 (b)(now B.25) (Transfer of Ownership or Operation) has been revised to clarify that this notification does not require a certification by a responsible official.

(b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11. **The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).**

11. Condition B.28 (now B.26) (Annual Fee Payment) has been revised to clarify the Permittee's responsibility for the timely payment of annual fees.

**B.286 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]**

(a) ~~The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing. or in a time period consistent with the fee schedule established in 326 IAC 2-7-19.~~ **If the Permittee does not receive a bill from IDEM, OAM the applicable fee is due April 1 of each year.**

(b) Failure to pay may result in administrative enforcement action, or revocation of this permit.

(c) ~~If the Permittee does not receive a bill from IDEM, OAM, thirty (30) calendar days before the due date, The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee. The applicable fee is due April 1 of each year.~~

**Section C:**

1. Condition C.1(b) is revised to clarify permitting requirements relating to any future modification(s) made at the source.

**C.1 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]**

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- (b) Any change or modification which may increase potential emissions to 250 tons per twelve (12) consecutive month period, from ~~the equipment covered in this permit~~ **this source**, shall ~~require a PSD permit pursuant to 326 IAC 2-2, before such change may occur~~ **cause this source to be considered a major source under PSD, 326 IAC 2-2 and 40 CFR 52.21, and shall require approval from IDEM, OAM prior to making the change.**

2. Condition C.2 (Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour) is a new condition that reads as follows to address the PM emission limitation for facilities below 100 pounds per hour.

**C.2 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]**

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**Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.**

3. The last sentence of Condition C.2 (renumbered C.3), has been deleted and the condition has been revised to reflect current rule language. The condition has been changed to:

**C.23 Opacity [326 IAC 5-1]**

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Pursuant to 326 IAC 5-1-2 (~~Visible Emissions~~ **Opacity** Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), ~~visible emissions opacity~~ **opacity** shall meet the following, unless otherwise stated in this permit:

- (a) ~~Visible emissions Opacity~~ shall not exceed an average of forty percent (40%) ~~opacity~~ in ~~twenty-four (24) consecutive readings~~, **any one (1) six (6) minute averaging period** as determined in 326 IAC 5-1-4.
- (b) ~~Visible emissions Opacity~~ shall not exceed sixty percent (60%) ~~opacity~~ 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.

~~This condition is not federally enforceable.~~

4. Conditions C.3 (now C.4) (Open Burning), C.4 (now C.5) (Incineration), and C.5 (now C.6) (Fugitive Dust Emissions) have each been revised to clarify which condition or portion thereof is not federally enforceable:

**C.34** **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. ~~This condition is not federally enforceable.~~ **326 IAC 4-1-3 (a) (2)(A) and (B) are not federally enforceable.**

**C.45** **Incineration** [326 IAC 4-2][326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. ~~This condition is not federally enforceable.~~

**C.56** **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). ~~Rule 326 IAC 6-4-2(4) regarding visible dust is not federally enforceable.~~ **326 IAC 6-4-2(4) is not federally enforceable.**

5. Condition C.6 (now C.7) (Operation of Equipment) has been revised to clarify the requirement.

**C.67** **Operation of Equipment** [326 IAC 2-7-6(6)]

All air pollution control equipment listed in this permit **and used to comply with an applicable requirement** shall be operated at all times that the emission unit vented to the control equipment is in operation. ~~as described in Section D of this permit.~~

6. Conditions C.7 (Asbestos Abatement Projects-Accreditation) and C.14 (Asbestos Abatement Projects) have been combined into one new condition C.8 (Asbestos Abatement Projects).

**C.8** **Asbestos Abatement Projects** [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

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

(b) **The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:**

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

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

(A) **Asbestos removal or demolition start date;**

(B) **Removal or demolition contractor; or**

**(C) Waste disposal site.**

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

**All required notifications shall be submitted to:**

**Indiana Department of Environmental Management  
Asbestos Section, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015**

**The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).**

- (e) Procedures for Asbestos Emission Control  
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.**
- (f) Indiana Accredited Asbestos Inspector  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.**

7. Condition C.8 (now C.9) (Performance Testing) is revised to correct a rule citation, add a notification requirement, and clarify that any submittal under this condition does not require a certification by a responsible official:

**C.89 Performance Testing ~~[326 IAC 3-2.4]~~ [326 IAC 3-6]**

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- (a) All testing shall be performed according to the provisions of 326 IAC ~~3-2.4~~ 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAM.**

**A test protocol, except as provided elsewhere in this permit, shall be submitted to:**

**Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015**

no later than thirty-five (35) days ~~before~~ **prior to** the intended test date. **The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.**

- (b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

**The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).**

8. Condition C.9 (now C.10) (Compliance Schedule) has been revised to more closely match the rule language.

**C.910** Compliance Schedule [326 IAC 2-7-6(3)]

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The Permittee:

- (a) **Has certified that all facilities at this source are in compliance with all applicable requirements; and** ~~Will continue to comply with such requirements that become effective during the term of this permit; and~~
- (b) Has submitted a statement that the Permittee will continue to comply with such requirements; and
- (c) **Will comply with such applicable requirements that become effective during the term of this permit.** ~~Has certified that all facilities at this source are in compliance with all applicable requirements.~~

9. Condition C.10 (now C.11) (Compliance Monitoring) has been revised to allow a one time extension of the time to install and initiate any required monitoring.

**C.101** Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

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Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee **may extend compliance schedule an additional ninety (90) days provided the Permittee shall** notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

in writing, **prior to the end of the initial ninety (90) day compliance schedule** ~~no more than ninety (90) days after receipt of this permit, with full justification of the reasons for the inability to meet this date. and a schedule which it expects to meet. If a denial of the request is not received before the monitoring is fully implemented, the schedule shall be deemed approved.~~

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

10. Condition C.12 (now C.13) (Monitoring Methods) has been revised to clarify the requirement.

**C.123** Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the **applicable** requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

11. Condition C.15 (Emergency Reduction Plans) has been revised to clarify that the plan does not require a certification by a responsible official.

**C.15** Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

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

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

within ninety (90) days after the date of issuance of this permit.

The ERP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) If the ERP is disapproved by IDEM, OAM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP. ~~If after this time, the Permittee does not submit an approvable ERP, then IDEM, OAM, shall supply such plan.~~
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAM, 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]

12. Condition C.16 (Risk Management Plan) has been revised to more closely match the rule language of 40 CFR 68 and clarify that any submittal under this condition requires a certification by a responsible official.

**C.16 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]**

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If a regulated substance, subject to 40 CFR 68, is present **in a process** in more than the threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

- (a) Submit:
- (1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
  - (2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
  - (3) A verification to IDEM, OAM, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.
- (b) Provide annual certification to IDEM, OAM, that the Risk Management Plan is being properly implemented.

**All documents submitted pursuant to this condition shall include the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).**

13. Condition C.17 (Compliance Monitoring Plan-Failure to Take Response Steps) the following rule cites were changed and added to the title, as follows:

**C.17 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5(9)]  
[326 IAC 2-7-6] [326 IAC 1-6]**

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14. Condition C.18 is revised to add the following rule cites to the title, and clarify that any submittal under this condition does not require a certification by a responsible official.

**C.18 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]  
[326 IAC 2-7-6]**

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- (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 take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.

- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

**The documents submitted pursuant to this condition do not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).**

15. Condition C.19 (a) has been revised to clarify the certification requirement for the emission statement.

C.19 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]~~

- (a) The Permittee shall submit ~~an certified~~, annual emission statement **certified pursuant to the requirements of 326 IAC 2-6**, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

16. Condition C.21 (General Record Keeping) is revised to add the following rule citation and to change the requirements for keeping records, making records available, and furnishing records, to more closely match the rule language as follows:

C.21 General Record Keeping Requirements ~~[326 IAC 2-7-5(3)(B)]~~~~[326 IAC 2-7-6]~~

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location **for a minimum of three (3) years** and available **upon the request** ~~within one (1) hour upon verbal request of an IDEM, OAM representative, for a minimum of three (3) years. They~~ **The records** may be stored elsewhere for the remaining two (2) years **as long as they are available upon request** ~~providing they are made available within thirty (30) days after written request.~~ **If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.**

17. Condition C.22 (General Reporting Requirements) is revised to clarify what is included in the compliance monitoring reports and clarify that any submittal under this condition does not require a certification by a responsible official. The deviation terminology was moved to a Section B condition titled Deviations from Permit Requirements and Conditions.

~~C.22 General Reporting Requirements [326 IAC 2-7-5(3)(C)]~~

- ~~(a) Reports required by conditions in Section D of this permit shall be submitted to:~~

~~Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015~~

**To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a ~~Quality~~ Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported.**

- ~~(b)~~ **The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:**

**Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015**

- ~~(b)(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, OAM on or before the date it is due.**

- ~~(e)(d)~~ **Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period.**

- ~~(d)(e)~~ **All instances of deviations ~~as described in Section B- Deviations from Permit Requirements Conditions~~ must be clearly identified in such reports. ~~A reportable deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:~~**

~~(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or~~

~~(2) An emergency as defined in 326 IAC 2-7-1(12); or~~

~~(3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.~~

~~(4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.~~

~~A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred or failure to monitor or record the required compliance monitoring is a deviation.~~

~~(e)~~(f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.

~~(f)~~(g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

**The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).**

#### Section D:

1. Section D (Facility Operation Conditions) has been changed to add the following language to the facility description box in all D sections. A portion of Section D.1 is presented as an example.

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

- (a) One (1) gel resin coating station, identified as SG1, using a maximum of 30 pounds of gel resin per hour, equipped with an air-assisted airless spray application system containing one (1) spray gun and a dry filter for particulate matter overspray control, exhausting at one (1) stack identified as S1;

2. Condition D.1.2 (Volatile Organic Compounds) has been revised to require compliance with the stated VOC usage limit on a twelve (12) consecutive month basis, rather than on a fixed monthly basis. This method of compliance is consistent with current OAM requirements. Additionally, Condition D.1.2 is revised to change the emission limit of the facility to an amount "less than" the applicable regulatory limit.

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

The volatile organic compounds (VOC) input to paint spray booth SG3, including VOC solvent usage, minus the VOC solvent shipped out, shall be limited to ~~2.0 tons per month~~ **less than 25 tons per twelve (12) consecutive month period**. Therefore, the best available control technology (BACT) requirement in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) shall not apply to facility SG3.

3. Condition D.1.5 (Testing Requirements) has been changed to revise the rule citation and update the language as follows:

D.1.5 Testing Requirements [326 IAC 2-7-6(1),(6)]

~~Testing of The Permittee is not required to test these facilities is not specifically required by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance.~~ If testing is required by IDEM, compliance with the volatile organic compound limits specified in Conditions D.1.1 and D.1.2, and the particulate matter limits specified in D.1.3, shall be determined by a performance test conducted in accordance with Section C - Performance Testing. ~~This does not preclude testing requirements on this facility under 326 IAC 2-7-5 and 326 IAC 2-7-6.~~

4. Condition D.1.6 (Volatile Organic Compounds) has changed the rule citations.

D.1.6 Volatile Organic Compounds (VOC)

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)(A)~~ **326 IAC 8-1-4(a)(3)** and ~~326 IAC 8-1-2(a)(7)~~ **326 IAC 8-1-2(a)** using formulation data supplied by the coating manufacturer. IDEM, OAM reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

5. D.1.7 (VOC Emissions) is a new condition added to the permit which reads as follows:

D.1.7 VOC Emissions

**Compliance with Condition D.1.2 shall be demonstrated at the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.**

6. D.1.8 (now D.1.9) (Monitoring) has been changed as follows.

D.1.89 Monitoring

- (a) Daily inspections shall be performed to verify the integrity of the particle collection waterwash systems. To monitor the performance of the waterwash systems, ~~daily~~ **weekly** observations shall be made of the overspray **from the surface coating booth stacks (S1, S2, S3)** while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) ~~Weekly~~ **Monthly** inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for the units shall contain troubleshooting contingency and response steps for when ~~an overspray emission, evidence of overspray emission, or other abnormal emission~~ **a noticeable change in overspray emission, or evidence of overspray emission** is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

7. Condition D.1.9(a) (now D.1.10(a)) (Visible Emissions Notations), and Condition D.1.10 (now D.1.11) (Parametric Monitoring), have been revised to clarify that visible emissions notations be recorded only when the facility exhausts to the atmosphere.

#### D.1.910 Visible Emissions Notations

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

#### D.1.101 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the trimming station, at least once daily when the trimming station is in operation **when exhausting to the atmosphere**. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouse shall be maintained such that the pressure drop is not less than 2.4 inches of water, or within a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

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

8. Condition D.1.11 (now D.1.12) (Broken Bag or Failure Detection) has been changed as follows:

#### D.1.112 Broken or Failed Bag or Failure Detection

In the event that bag failure has been observed.

(a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. ~~For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced.~~ **Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).**

(b) ~~Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Preventive Maintenance Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Preventive Maintenance Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion.~~ **For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced.**

**Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).**

9. Condition D.1.12(b) (now D.1.13(b)) (Record Keeping Requirements) has been revised as follows:
  - (b) To document compliance with Conditions D.1.8(a) and D.1.9, the Permittee shall maintain a log of ~~daily~~ **weekly** overspray observations, daily and ~~weekly~~ **monthly** inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
  
9. Condition D.1.12(d) (now D.1.13(d)) (Record Keeping Requirements) has been revised as follows:
  - (d) To document compliance with Condition D.1.11, the Permittee shall maintain the following:
    - (1) Daily records of the following operational parameters during normal operation **when exhausting to the atmosphere:**
      - (A) Inlet and outlet differential static pressure; and
      - (B) Cleaning cycle: frequency and differential pressure.
    - (2) Documentation of all response steps implemented, per event .
    - (3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.
    - (4) Quality Assurance/Quality Control (QA/QC) procedures.
    - (5) Operator standard operating procedures (SOP).
    - (6) Manufacturer's specifications or its equivalent.
    - (7) Equipment "troubleshooting" contingency plan.
    - (8) Documentation of the dates vents are redirected.**

### Forms:

1. The Certification Form is revised to clarify which forms require a certification.
2. The Emergency/Deviation Occurrence Reporting Form is revised to eliminate the certification requirement.
3. The Quarterly Report form is revised to reflect the change to Condition D.1.2.
4. The Quarterly Compliance Report is renamed the Quarterly Compliance Monitoring Report and is revised to make it easier to understand and use.

### Emission Calculations and Technical Support Document

Emission calculations and related portions of the original Technical Support Document (TSD) are revised as follows:

#### Emission Calculations

Potential emission rates of VOC and single hazardous air pollutants (as styrene), presented in the Technical Support Document (TSD) to the draft Part 70 permit, are revised using U.S. EPA's new VOC flash-off factors for polyester plastics production. The new emission factors, based on the "CFA Emission Models for the Reinforced Plastics Industries", February, 1998, replace those factors previously applied, as found in U.S. EPA's AP-42 document, 5<sup>th</sup> edition, Chapter 4, Table 4.4-2. The new emission factors are based on the weight percent of resin or gel coat that is emitted as styrene (which is a VOC and a HAP). The facilities affected by the new factors include the gel resin coating station and the lamination station, respectively identified as SG1 and SG2. See Appendix A of this TSD Addendum for revised emissions calculations for these two facilities (one (1) page). The original TSD is revised to reflect the new potential source VOC and styrene emission rates. While the potential VOC and HAP emissions from the fiberglass layup operations have increased due to the application of the revised factors, conditions of the draft Part 70 permit are unaffected as the source status continues to be minor for PSD applicability purposes (i.e., potential emissions at less than 250 tons per year).

#### Emission Units and Pollution Control Equipment Under Enhanced New Source Review (ENSR)

All unpermitted emission units and pollution control equipment at the source are reviewed under the ENSR process.

There are no new emission units under ENSR during this review. **The potential volatile organic compound (VOC) emissions increase from facilities SG1 and SG2, due to the application of newly derived VOC flash-off factors, is included under ENSR.**

#### Potential Emissions

Pursuant to 326 IAC 1-2-55, Potential Emissions are defined as "emissions of any one (1) pollutant which would be emitted from a facility, if that facility were operated without the use of pollution control equipment unless such control equipment is necessary for the facility to produce its normal product or is integral to the normal operation of the facility."

Pollutant	Potential Emissions (tons/year)
PM	greater than 100, less than 250
PM-10	less than 100
SO <sub>2</sub>	less than 100
VOC	<del>less than 100</del> <b>greater than 100, less than 250</b>
CO	less than 100
NO <sub>x</sub>	less than 100

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential Emissions (tons/year)
xylene	less than 10
toluene	less than 10
ethyl benzene	less than 10
glycol ethers	less than 10
methanol	less than 10
methyl ethyl ketone (MEK)	less than 10
methyl isobutyl ketone (MIBK)	less than 10
methyl methacrylate	less than 10
styrene	greater than 10
TOTAL	greater than 25

(a) **The potential emissions (as defined in the Indiana Rule) of volatile organic compounds (VOC) are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.**

~~(a)~~(b) The potential emissions (as defined in Indiana Rule) of any single HAP are equal to or greater than ten (10) tons per year and the potential emissions (as defined in Indiana Rule) of the combined HAPs are greater than or equal to twenty-five (25) tons per year. The potential emissions includes both permitted and unpermitted/Enhanced New Source Review emission units and pollution control equipment. Therefore, the source is subject to the provisions of 326 IAC 2-7.

**Limited Potential to Emit**

The table below summarizes the total limited potential to emit (based on enforceable production limits):

Process/facility	Limited Potential to Emit (PTE) (tons/year)							
	PM	PM-10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	Single HAP	Total HAPs
Gel coating station SG1	<del>0.1</del> <b>0.2</b>	<del>0.1</del> <b>0.2</b>	0.0	<del>20.5</del> <b>33.1*</b>	0.0	0.0	<del>48.9</del> <b>31.6</b>	<del>20.5</del> <b>33.1</b>
Lamination station SG2	<del>0.5</del> <b>1.4</b>	<del>0.5</del> <b>1.4</b>	0.0	<del>45.4</del> <b>71.9</b>	0.0	0.0	<del>45.4</del> <b>71.9</b>	<del>45.4</del> <b>71.9</b>
Trimming station	<0.1	<0.1	0.0	0.0	0.0	0.0	0.0	0.0
Paint spray booth SG3	0.2	0.2	0.0	24.0	0.0	0.0	4.7	18.0

Total Emissions	<del>0.0</del> 1.9	<del>0.0</del> 1.9	0.0	<del>00.0</del> 129.0	0.0	0.0	<del>60.0</del> 108.2	<del>83.0</del> 123.0
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\* Includes potential methyl methacrylate (as VOC and HAP) emissions of 1.6 tons per year.

### Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 187 hazardous air pollutants set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Part 70 Application Form GSD-08.

- (a) This source will emit levels of air toxics greater than those that constitute major source applicability according to Section 112 of the Clean Air Act.
- (b) See attached calculations for detailed air toxic calculations for units covered under Enhanced New Source Review (see Appendix A, two (2) pages).

The concentrations of these air toxics were modeled and found to be (in the worst case possible) as follows: The concentrations of these air toxics were compared to the Permissible Exposure Limits (PEL) developed by the Occupational Safety and Health Administration (OSHA). The Office of Air Management (OAM) does not have at this time any specific statutory or regulatory authority over these substances.

#### Air Toxics Analysis

Pollutant	Rate (lb/hr)	Rate (ton/yr)	Modeled Conc. (Fg/m <sup>3</sup> )	OSHA PEL (Fg/m <sup>3</sup> )	% OSHA PEL
Styrene	<del>44.68</del> 23.62	<del>64.28</del> 103.46	<del>4962.5</del> 3157.6	428,000	<del>0.46%</del> 0.74%
Methyl Methacrylate	0.36	1.58	48.1	410,000	0.01%
Xylene	0.90	3.93	87.9	435,000	0.02%
Toluene	1.06	4.65	103.5	752,000	0.01%
MEK	0.15	0.66	14.6	590,000	0.00%
MIBK	0.18	0.77	17.6	410,000	0.00%
Glycol Ethers	0.87	3.82	84.9	125,000*	0.07%
Ethyl Benzene	0.09	0.40	8.8	435,000	0.00%

\* PEL for ethylene glycol used as default for this glycol ether.

On January 29, 1998, Industrial Safety and Environmental Services, as the environmental consultant to Fiber-Tron, Inc., submitted a comment on behalf of Fiber-Tron, Inc. on the proposed Part 70 permit and ENSR. A summary of the comment and corresponding response is as follows:

**Comment #1:**

Fiber-Tron, Inc. has a small area located between the gel/chop booth (at the south end of the plant) and the trimming area (at the north end of the plant) which is typically reserved for construction of new molds which their customers might require. At this time, no molds are being constructed and the area is being used as additional indoor storage for running boards. During the lifetime of this permit, however, Fiber-Tron, Inc. would like to be able to use this area for mold construction utilizing portable gel and chop spray equipment. Based on the history of plant operations, maximum potential usage is estimated at 5,000 pounds of chop and 1,000 pounds of gel under a 2,000 hour per year plant operating schedule, with 35 percent and 36 percent styrene (by weight) contained in the chop and gel resins, respectively.

**Response to Comment #1:**

Potential facility emission rates of volatile organic compounds (VOC) and single hazardous air pollutants (as styrene) are computed using the U.S. EPA's new emission flash-off factors for polyester plastics production (i.e., the "CFA Emission Models for the Reinforced Plastics Industries" as described above). From potential material usage information supplied by the applicant, the potential emissions associated with the mold construction are as follows:

$5,000 \text{ lb chop resin} / 2,000 \text{ hr} * 0.35 \text{ (\% styrene in chop resin)} * 0.07 \text{ (emission factor as \% resin weight)} * 8,760 \text{ hr / yr} * \text{ton} / 2,000 \text{ lb} = 0.27 \text{ ton / yr as styrene and VOC}$

$1,000 \text{ lb gel resin} / 2,000 \text{ hr} * 0.42 \text{ (\% styrene in gel resin)} * 0.24 \text{ (emission factor \% resin weight)} * 8,760 \text{ hr / yr} * \text{ton} / 2,000 \text{ lb} = 0.22 \text{ ton / yr as styrene and VOC}$

The total potential styrene and VOC emission rate for the mold construction area is 0.5 tons per year (0.11 pounds per hour styrene and VOC). This VOC emission rate is well below the 326 IAC 2-1-1 construction permit applicability threshold of 25 tons per year, the 326 IAC 2-1-1 exemption and 326 IAC 2-7-1(21) insignificant activity thresholds of 3 pounds per hour and 15 pounds per day, and no other rules currently apply to this proposed facility. Consequently, neither Section A.2 (Emission Units and Pollution Control Equipment Summary) nor Section A.3 (Specifically Regulated Insignificant Activities) of the Part 70 permit are revised to include this facility. This Addendum to the Technical Support Document, however, serves to approve this new facility and update the listing of the source's insignificant activities, as initially presented in the Technical Support Document to the Part 70 Operating Permit, as follows:

**Insignificant Activities**

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units (Btu) per hour.
- (b) Volatile organic compound (VOC) or hazardous air pollutant (HAP) storage tanks with capacity less than or equal to 1,000 gallons and annual throughout less than 12,000 gallons.

- (c) Application of oils, greases, lubricants or other nonvolatile materials applies as temporary protective coatings.
- (d) Solvent recycling systems with batch capacity less than or equal to 100 gallons.
- (e) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals measured at 38 degrees Celsius).
- (f) **Mold construction area utilizing one (1) portable air assisted airless gel resin spray gun rated at 0.5 pounds of gel resin per hour and one (1) portable air assisted airless fiberglass chop resin spray gun rated at 2.5 pounds of fiberglass chop resin per hour.**

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT  
CERTIFICATION**

Source Name: Fiber-Tron, Inc.  
Source Address: 29877 US 33 West, Elkhart, Indiana 46516  
Mailing Address: 29877 US 33 West, Elkhart, Indiana 46516  
Part 70 Permit No.: T039-6337-00152

**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:

9 Annual Compliance Certification Letter

~~9 Emergency/Deviation Occurrence Reporting Form~~

9 Test Result (specify) \_\_\_\_\_

9 Report (specify) \_\_\_\_\_

9 Notification (specify) \_\_\_\_\_

9 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:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION  
P.O. Box 6015  
100 North Senate Avenue  
Indianapolis, Indiana 46206-6015  
Phone: 317-233-5674  
Fax: 317-233-5967**

**PART 70 OPERATING PERMIT  
EMERGENCY/DEVIATION OCCURRENCE REPORT**

Source Name: Fiber-Tron, Inc.  
Source Address: 29877 US 33 West, Elkhart, Indiana 46516  
Mailing Address: 29877 US 33 West, Elkhart, Indiana 46516  
Part 70 Permit No.: T039-6337-00152

**This form consists of 2 pages**

**Page 1 of 2**

Check either No. 1 or No.2	
<b>9 1.</b>	This is an emergency as defined in 326 IAC 2-7-1(12)
<input type="checkbox"/>	The Permittee must notify the Office of Air Management (OAM), within four <b>(4)</b> business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
<input type="checkbox"/>	The Permittee must submit notice in writing or by facsimile within two <b>(2)</b> days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
<b>9 2.</b>	This is a deviation, reportable per 326 IAC 2-7-5(3)(c)
<input type="checkbox"/>	The Permittee must submit notice in writing within ten <b>(10)</b> calendar days

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/Deviation:
Describe the cause of the Emergency/Deviation:

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

Page 2 of 2

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation?    Y    N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
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: \_\_\_\_\_

~~Attach a signed certification to complete this report.~~

## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR MANAGEMENT COMPLIANCE DATA SECTION

### Part 70 Quarterly Report

Source Name: Fiber-Tron, Inc.  
Source Address: 29877 US 33 West, Elkhart, Indiana 46516  
Mailing Address: 29877 US 33 West, Elkhart, Indiana 46516  
Part 70 Permit No.: T039-6337-00152  
Facility: Paint spray booth SG3  
Parameter: Volatile organic compounds (VOC)  
Limit: ~~2.0 tons per month~~ **less than 25 tons per twelve (12) consecutive months**

Year: \_\_\_\_\_

Month	VOC Usage this Month (tons)	VOC Usage Past 11 Months (tons)	Total VOC Usage 12 Months (tons)

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.  
Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
Title/Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
 OFFICE OF AIR MANAGEMENT  
 COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT  
 QUARTERLY COMPLIANCE *MONITORING* REPORT**

Source Name: Fiber-Tron, Inc.  
 Source Address: 29877 US 33 West, Elkhart, Indiana 46516  
 Mailing Address: 29877 US 33 West, Elkhart, Indiana 46516  
 Part 70 Permit No.: T039-6337-00152

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

This report is an affirmation that the source has met all the **compliance monitoring** requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the **compliance monitoring** requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify ~~zero in the column marked "No Deviations"~~: **in the box marked "No deviations occurred this reporting period"**.

**9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.**

~~9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD: LIST EACH COMPLIANCE REQUIREMENT EXISTING FOR THIS SOURCE:~~

<i>Compliance Monitoring Requirement</i> (e.g. Permit Condition D.1.8)	<b>Number of Deviations</b>	<b>Date of each Deviations</b>	<b>No Deviations</b>

Form Completed By: \_\_\_\_\_  
 Title/Position: \_\_\_\_\_  
 Date: \_\_\_\_\_  
 Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**Appendix A: Emissions Calculations**  
**Form DD: Reinforced Plastics and Composites**  
**Fiberglass Processes**

**Company Name: Fiber-Tron, Inc.**  
**Address City IN Zip: 29877 US 33 West**  
**Part 70 No.: T039-6337**  
**Plant ID: 039-00152**  
**Reviewer: Michael Hirtler**  
**Date: September 21, 1998**

State Potential Emissions (uncontrolled):												
Material (as applied)	Density (Lb/Gal)	Weight % Styrene Monomer or VOC	Emission Factor % of Resin/ Gel Coat Weight	Gal of Mat (gal/unit)	Maximum (unit/hour)	Volume % Non-Vol (solids)	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential ton/yr	lb VOC /gal solids	Transfer Efficiency
<b>Gel Coating Station (SG1)</b>												
Gel Resin	9.95	42.00%	24.00%	30.0200	pounds/hour	NA	7.20	172.92	31.56	11.44	ERR	85.00%
<b>Lamination (SG2)</b>												
Fiberglass Chop Resin	9.23	35.00%	7.00%	234.5100	pounds/hour	NA	16.42	393.98	71.90	100.15	ERR	85.00%
<b>Total State Potential Emissions:</b>							<b>23.62</b>	<b>566.89</b>	<b>103.46</b>	<b>111.59</b>		
Federal Potential Emissions (controlled):												
					Control Efficiency:		Controlled VOC lbs per Hour	Controlled VOC lbs per Day	Controlled VOC tons per Year	Controlled PM tons/yr		
					VOC	PM						
<b>Total Federal Potential Emissions:</b>					0.00%	94.00%	<b>23.62</b>	<b>566.89</b>	<b>103.46</b>	<b>6.70</b>		

**Note:****Methodology:**

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

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

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

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) \* Transfer Efficiency

Total = Worst Coating + Sum of all solvents used

Controlled emission rate = uncontrolled emission rate \* (1 - control efficiency)

Emission Factors are based on new AP42 factors which were taken from the "CFA Emission Models for the Reinforced Plastics Industries", February, 1998.

**Appendix A: Emissions Calculations  
Reinforced Plastics and Composites  
Non Vapor Supressed (NVS) Fiberglass Processes**

Company Name: **Fiber-Tron, Inc.**  
Address City IN Zip: **29877 US 33 West**  
Part 70 No.: **T039-6337**  
Plant ID: **039-00152**  
Reviewer: **Michael Hirtler**  
Date: **February 23, 1998**

**Flash Off Factor Determination**

Application Type	thickness of part (inches)	styrene content (wt. %)	gel time (minutes)	resin flow rate (lbs/min) *	gel coat flow rate (lbs/min) *	air flow velocity (ft/min)	standard deviation "Std"	calculated flash-off (%)	minimum flash-off (%)	flash off factor (%)
Resin Non-Spray Layup (ns)				---	---		<b>1.07</b>	<b>ERR</b>	<b>15.40%</b>	<b>ERR</b>
Resin Spray Layup (s)	0.375	35.00%	13.00	3.92	---	100.00	<b>1.28</b>	<b>-1.73%</b>	<b>25.90%</b>	<b>25.90%</b>
Gel Coat (gc)	0.005	42.00%	13.00	---	0.75	100.00	<b>1.13</b>	<b>85.31%</b>	<b>52.10%</b>	<b>85.31%</b>

\* note: "----" means no value required for calculation of particular application type

**METHODOLOGY**

TH = thickness of part in inches                      GCF = gel coat flow rate in pounds per minute  
 SC = weight percent styrene content                AF = air flow velocity in feet per minute  
 GT = gel time in minutes                                Std = standard deviation (ns=1.07, s=1.28, gc=1.13)  
 RF = resin flow rate in pounds per minute

calculated % flash off for Resin (ns) = ( -0.46365 \* TH + 0.00265 \* SC + 0.00068 \* GT + 3E-05 \* AF - 0.032 ) \* Std / SC%

calculated % flash off for Resin (s) = ( -0.19881 \* TH + 0.00827 \* SC + 0.00038 \* GT - 0.00854 \* RF + 3E-05 \* AF - 0.1941 ) \* Std / SC%

calculated % flash off for Gel Coat (gc) = ( -5.34119 \* TH + 0.00897 \* SC + 0.00083 \* GT - 0.00018 \* GCF + 4E-05 \* AF - 0.0476 ) \* Std / SC%

flash off factor (%) = calculated % flash off or minimum flash off, whichever is greater

**Emissions Calculations**

Material	Density (lb/gal)	Weight % Styrene Monomer	Gallons per unit	Units per hour	Pound VOC per hour	Pounds VOC per day	Tons of VOC per Year	PM tons per year	Flash off Factor (%)	Transfer Efficiency
Gel Resin	9.95	42.0%	30.02	pounds/hour	10.76	258.16	47.11	11.44	85.31%	85.00%
Chop Resin	9.23	35.0%	234.51	pounds/hour	21.26	510.20	93.11	100.15	25.90%	85.00%
		0.0%	0.00	0.00	0.00	0.00	0.00	0.00	0.00%	0.00%

**Total Uncontrolled Potential Emissions:**

**32.01      768.36      140.22      111.59**

Total Controlled Potential Emissions:	VOC Input Usage Limitation	Control Efficiency	Controlled VOC lbs per Hour	Controlled VOC lbs per Day	Controlled VOC tons per Year	Controlled PM tons/yr
	VOC	PM				
	0.00%	94.00%	<b>32.01</b>	<b>768.36</b>	<b>140.22</b>	<b>6.70</b>

**METHODOLOGY**

Uncontrolled Potential VOC Pounds per Hour = Density (lb/gal) \* Weight % Monomer \* Gal of Material (gal/unit) \* Maximum (unit/hr) \* Emission factor

Uncontrolled Potential VOC Pounds per Day = Density (lb/gal) \* Weight % Monomer \* Gal of Material (gal/unit) \* Maximum (unit/hr) \* (24 hrs / 1 day) \* Emission factor

Uncontrolled Potential VOC Tons per Year = Density (lb/gal) \* Weight % Monomer \* Gal of Material (gal/unit) \* Maximum (unit/hr) \* (8760 hr/yr) \* (1 ton / 2000 lbs) \* Emission factor

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

Total = Sum of all worst case coatings and solvents used

Flash Off Factor (%) = calculated % flash off or minimum flash off, whichever is greater from above tabulation

Controlled VOC Emission Rate = Uncontrolled Emission Rate \* VOC Input Limitation (Note: no VOC input limitation for these emission units)

Controlled PM Emission Rate = Uncontrolled Emission Rate \* VOC Input Limitation \* (1 - Control Efficiency)

**Appendix A: Emission Calculations  
VOC and Particulate  
From Surface Coating Operations at Paint Spray Booth SG3**

Company Name: Fiber-Tron, Inc.  
Address City IN Zip: 29877 US 33 West  
Part 70 No.: T039-6337  
Plant ID: 039-00152  
Reviewer: Michael Hirtler  
Date: October 31, 1997

Potential Uncontrolled Emissions:																				
Coating Material (as applied)	Product Being Coated	Density (Lb/Gal)	Weight % Volatile (H2O& Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential ton/yr	Ib VOC /gal solids	Transfer Efficiency			
<b>Paint Spray Booth, SG-3</b>	Fiberglass Running Boards																			
Jug Sealer/Reducer		7.10	93.80%	0.00%	93.80%	0.00%	N/A	0.539727	1.625	6.66	6.66	5.84	140.18	25.58	0.85	ERR	50%			
Mixing Base 813/Reducer		7.42	67.56%	0.00%	67.56%	0.00%	15.20%	0.516450	1.625	5.01	5.01	4.21	100.97	18.43	4.42	32.98	50%			
Mixing Base 832/Reducer		7.54	66.76%	0.00%	66.76%	0.00%	15.20%	0.508231	1.625	5.03	5.03	4.16	99.77	18.21	4.53	33.12	50%			
Mixing Base 833/Reducer		7.50	67.12%	0.00%	67.12%	0.00%	15.12%	0.510942	1.625	5.03	5.03	4.18	100.31	18.31	4.48	33.29	50%			
Mixing Base 834/Reducer		7.47	66.20%	0.00%	66.20%	0.00%	16.32%	0.512994	1.625	4.95	4.95	4.12	98.94	18.06	4.61	30.30	50%			
Mixing Base 856/Reducer		7.43	67.56%	0.00%	67.56%	0.00%	15.08%	0.515755	1.625	5.02	5.02	4.21	100.97	18.43	4.42	33.29	50%			
<b>Total Uncontrolled Potential Emissions:</b>												<b>5.84</b>	<b>140.18</b>	<b>25.58</b>	<b>4.61</b>					
Controlled Potential Emissions:																				
										VOC Input Usage Limitation	Control Efficiency	Controlled VOC lbs per Hour	Controlled VOC lbs per Day	Controlled VOC tons per Year	Controlled PM tons/yr					
										VOC	PM									
<b>Total Controlled Potential Emissions:</b>										93.82%	95.00%	<b>5.48</b>	<b>131.52</b>	<b>24.00</b>	<b>0.22</b>					

**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 hrs/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) \* Transfer Efficiency  
 Total Uncontrolled Potential Emissions = Worst Case Coating Applied + Sum of all Solvents Used (Note: All coatings are applied on a mutually exclusive basis).  
 Controlled VOC Emission Rate = Uncontrolled Emission Rate \* VOC Input Limitation  
 Controlled PM Emission Rate = Uncontrolled Emission Rate \* VOC Input Limitation \* (1 - Control Efficiency)  
 VOC input usage to the paint applicator will be limited to 93.82% of potential input usage based on 8,760 hours per year operation in order to limit VOC from the painting facility to 24.0 tons per year. Therefore, the requirements pursuant to 326 IAC 8-1-6 will not apply to this facility.

Note: Maximum hourly coating material usage rate (gallons per unit \* units per hour) is derived from actual 1995 paint usage, fiberglass running board production and an operation schedule of 2,000 hours, as provided by the applicant. Annual paint usage did not distinguish between the individual coating materials comprising the total amount applied during 1995. Therefore, the maximum hourly usage rate was assumed for each coating material applied. The coating/reducer "as-applied" mixture ratio is 40% coating to 60% reducer. Only one coating is applied at a time.

Appendix A: HAP Emission Calculations

Company Name: Fiber-Tron, Inc.  
 Address City IN Zip: 29877 US 33 West  
 Part 70 No.: T039-6337  
 Plant ID: 039-00152  
 Reviewer: Michael Hirtler  
 Date: October 31, 1997

Material (as applied)	Density (Lb/Gal)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Ethylbenzene	Weight % Glycol Ethers	Weight % Methanol	Weight % MEK	Weight % MIBK	Weight %	HAP EMISSION RATES (TONS PER YEAR)							Total All HAPs										
												Xylene	Toluene	Ethylbenzene	Glycol Ethers	Methanol	MEK	MIBK											
<b>Paint Spray Booth, SG-3</b>																													
Jug Sealer	7.16	0.215891	1.625	0.00%	0.00%	0.00%	0.00%	0.00%	6.00%	7.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.66	0.77	0.00	1.43									
Reducer	7.06	0.323836	1.625	0.00%	25.00%	0.00%	25.00%	25.00%	0.00%	0.00%	0.00%	0.00	4.07	0.00	4.07	4.07	0.00	0.00	0.00	12.20									
												<b>0.00</b>	<b>4.07</b>	<b>0.00</b>	<b>4.07</b>	<b>4.07</b>	<b>0.66</b>	<b>0.77</b>	<b>0.00</b>	<b>13.63</b>									
Mixing Base 813	7.42	0.206580	1.625	36.00%	5.00%	6.00%	4.00%	0.00%	0.00%	0.00%	0.00%	3.93	0.55	0.40	0.27	0.00	0.00	0.00	0.00	5.14									
Reducer	7.06	0.309670	1.625	0.00%	25.00%	0.00%	25.00%	25.00%	0.00%	0.00%	0.00%	0.00	3.89	0.00	2.40	2.40	0.00	0.00	0.00	8.68									
												<b>3.93</b>	<b>4.44</b>	<b>0.40</b>	<b>2.66</b>	<b>2.40</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>13.83</b>									
Mixing Base 832	7.54	0.203292	1.625	35.00%	5.00%	6.00%	4.00%	0.00%	0.00%	0.00%	0.00%	3.82	0.55	0.40	0.27	0.00	0.00	0.00	0.00	5.04									
Reducer	7.06	0.304939	1.625	0.00%	25.00%	0.00%	25.00%	25.00%	0.00%	0.00%	0.00%	0.00	3.83	0.00	2.36	2.36	0.00	0.00	0.00	8.55									
												<b>3.82</b>	<b>4.38</b>	<b>0.40</b>	<b>2.63</b>	<b>2.36</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>13.58</b>									
Mixing Base 833	7.50	0.204377	1.625	36.00%	4.00%	6.00%	4.00%	0.00%	0.00%	0.00%	0.00%	3.93	0.44	0.40	0.27	0.00	0.00	0.00	0.00	5.04									
Reducer	7.06	0.306565	1.625	0.00%	25.00%	0.00%	25.00%	25.00%	0.00%	0.00%	0.00%	0.00	3.85	0.00	2.37	2.37	0.00	0.00	0.00	8.59									
												<b>3.93</b>	<b>4.29</b>	<b>0.40</b>	<b>2.64</b>	<b>2.37</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>13.63</b>									
Mixing Base 834	7.47	0.205197	1.625	36.00%	3.00%	6.00%	4.00%	0.00%	0.00%	0.00%	0.00%	3.93	0.33	0.40	0.27	0.00	0.00	0.00	0.00	4.93									
Reducer	7.06	0.307796	1.625	0.00%	25.00%	0.00%	25.00%	25.00%	0.00%	0.00%	0.00%	0.00	3.87	0.00	2.38	2.38	0.00	0.00	0.00	8.63									
												<b>3.93</b>	<b>4.19</b>	<b>0.40</b>	<b>2.65</b>	<b>2.38</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>13.55</b>									
Mixing Base 856	7.43	0.206302	1.625	36.00%	7.00%	6.00%	4.00%	0.00%	0.00%	0.00%	0.00%	3.93	0.76	0.40	0.27	0.00	0.00	0.00	0.00	5.36									
Reducer	7.06	0.309453	1.625	0.00%	25.00%	0.00%	25.00%	25.00%	0.00%	0.00%	0.00%	0.00	3.89	0.00	2.39	2.39	0.00	0.00	0.00	8.67									
												<b>3.93</b>	<b>4.65</b>	<b>0.40</b>	<b>2.66</b>	<b>2.39</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>14.03</b>									
Total Uncontrolled Potential Emissions:												<b>3.93</b>	<b>4.65</b>	<b>0.40</b>	<b>4.07</b>	<b>4.07</b>	<b>0.66</b>	<b>0.77</b>	<b>0.00</b>	<b>18.55</b>									
Total Controlled Emissions:												<b>3.93</b>	<b>4.65</b>	<b>0.40</b>	<b>3.82</b>	<b>3.82</b>	<b>0.62</b>	<b>0.72</b>	<b>0.00</b>	<b>17.96</b>									

**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  
 Total Uncontrolled Potential Emissions (tons/year) = Worst Case Coating Applied + Sum of all Solvents Used (Note: All coatings are applied on a mutually exclusive basis).  
 Total Controlled Emissions (tons/year) = Uncontrolled Emission Rate \* HAP (or VOC) Input Usage Limitation  
 VOC input usage to the paint applicator will be limited to 93.82% of potential input usage based on 8,760 hours per year operation in order to limit VOC from the painting facility to 24.0 tons per year.  
 Since all HAPs shown above are also VOCs, the same limitation is assumed for HAP emissions. However, as shown on page 1 of 2 of Appendix A, based on the uncontrolled emissions for each coating material, this limitation has been applied solely to the HAPs found in the Jug Sealer/Reducer. Therefore, the requirements pursuant to 326 IAC 8-1-6 will not apply to this facility.