

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

**Bremen Technologies, Inc., Plants 1, 2 and 3  
425 Industrial Drive (Plant 1)  
1729 West Dewey (Plant 2)  
1726 West Bike (Plant 3)  
Bremen, Indiana 46506**

(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.: <b>T099-7078-00036</b>	
Issued by: Janet G. McCabe, 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 plant for the manufacture of fiberglass components for the automotive, recreational vehicle and van conversion industries.

Responsible Official: Alvin Hildenbrand  
Source Address: 425 Industrial Drive (Plant 1), 1729 West Dewey (Plant 2), 1726 West Bike (Plant 3), Bremen, IN 46506  
Mailing Address: 425 Industrial Drive, Bremen, IN 46506  
SIC Code: 3711, 3713, 3714  
County Location: Marshall  
County Status: Attainment for all criteria pollutants  
Source Status: Minor Source, under PSD Rules  
Major Source, Part 70 Permit Program  
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:

- (1) Plant 1 Mold Prep Area, including:
  - (a) Three (3) die grinders, identified as P1MPDG1, P1MPDG2 and P1MPDG3;
  - (b) One (1) air drill, identified as P1MPAD1;
  - (c) One (1) "small" grinder, identified as P1MPG1;
  - (d) Five (5) buffers, identified as P1MPB1, P1MPB2, P1MPB3, P1MPB4 and P1MPB5;
  - (e) Three (3) spray guns spraying mold releases and tooling gel (tooling gel for repair of molds only), controlled by dry filters, exhausting to stacks C2, C3, C4, C5, C6, C7 and C8; and
  - (f) Hand application of waxes, controlled by dry filters, exhausting to stacks C2, C3, C4, C5, C6, C7 and C8;
- (2) Plant 1 East Gel Area, consisting of one (1) spray gun, identified as P1EGSG1, with maximum capacity of 126.39 pounds of fiberglass per hour, making fiberglass components for the RV industry, controlled by dry filters, exhausting to stacks P1 and P2;
- (3) Plant 1 West Gel Area, consisting of one (1) spray gun, identified as P1WGSG1, with maximum capacity of 84 pounds of fiberglass per hour, making fiberglass components for the RV industry, controlled by dry filters, exhausting to stack P3;

- (4) Plant 1 East Chop Area, consisting of three (3) spray guns, identified as P1EC SG1, P1EC SG2, and P1EC SG3, with maximum capacity of 1,402 pounds of fiberglass per hour, making fiberglass components for the RV industry, controlled by dry filters, exhausting to stacks C2, C3, C4, C5, C6, C7 and C8;
- (5) Plant 1 West Chop Area, consisting of two (2) spray guns, identified as P1WCSG1 and P1WCSG2, with maximum capacity of 934 pounds of fiberglass per hour, making fiberglass components for the RV industry, controlled by dry filters, exhausting to stacks C9 and C10;
- (6) Plant 1 Grinding Area, consisting of the following:
  - (a) Three (3) die grinders, identified as P1GDG1, P1GDG2, and P1GDG3, controlled by a dust collector (DC1), exhausting to stack DCX1;
  - (b) Two (2) 5" surface grinders, identified as P1G5SG1, P1G5SG2, controlled by a dust collector (DC1), exhausting to stack DCX1;
  - (c) Four (4) pneumatic cutters, identified as P1GCUT1, P1GCUT2, P1GCUT3, and P1GCUT4, controlled by a dust collector (DC1), exhausting to stack DCX1;
  - (d) One (1) hand-held circular saw, identified as P1GCS1, controlled by a dust collector (DC1), exhausting to stack DCX1;
  - (e) Two (2) air drills, identified as P1GAD1 and P1GAD2, controlled by a dust collector (DC1), exhausting to stack DCX1;
  - (f) Three (3) angle sanders, identified as P1GAS1, P1GAS2, and P1GAS3, controlled by a dust collector, exhausting to stack DCX1;
  - (g) One (1) mini-die grinder, identified as P1GMDG1, controlled by a dust collector (DC1), exhausting to stack DCX1;
- (7) Plant 1 Final Finish Area, consisting of the following:
  - (a) Eleven (11) dual action grinders, identified as P1FFDA1, P1FFDA2, P1FFDA3, P1FFDA4, P1FFDA5, P1FFDA6, P1FFDA7, P1FFDA8, P1FFDA9, P1FFDA10, and P1FFDA11, controlled by dry filters, exhausting to stacks FF1 and FF2;
  - (b) Eight (8) buffers, identified as P1FFB1, P1FFB2, P1FFB3, P1FFB4, P1FFB5, P1FFB6, P1FFB7 and P1FFB8, controlled by dry filters, exhausting to stacks FF1 and FF2;
  - (c) Five (5) die grinders, identified P1FFDG1, P1FFDG2, P1FFDG3, P1FFDG4, and P1FFDG5, controlled by dry filters, exhausting to stacks FF1 and FF2;
  - (d) Two (2) 5" grinders, identified as P1FF5G1 and P1FF5G2, controlled by dry filters, exhausting to stacks FF1 and FF2;
  - (e) Eight (8) spray guns, identified as Emission Units P1FFSG1, P1FFSG2, P1FFSG3, P1FFSG4, P1FFSG5, P1FFSG6, P1FFSG7, and P1FFSG8, controlled by dry filters, exhausting to stacks FF1 and FF2; and
  - (f) Hand application of waxes and fillers, exhausting to stacks FF1 and FF2;

- (8) Plant 2 Pattern/Plug Making Area, consisting of the following:
  - (a) One (1) saber saw, identified as P2PMSS1;
  - (b) Two (2) cutter saws, identified as P2PMCS1 and P2PMSC2;
  - (c) Two (2) band saws, identifies as P2PMBS1 and P2PMBS2;
  - (d) Three (3) 5" grinders, identified as P2PM5G1, P2PM5G2, and P2M5G3;
  - (e) One (1) drill, identified as P2PMDR1;
  - (f) Three (3) die grinders, identified as P2PMDG1, P2PMDG2, and P2PMDG3;
  - (g) One (1) table saw, identified as P2PMTS1;
  - (h) Three (3) dual action grinders, identified as P2PMDG1, P2PMDG2, and P2PMDG3;
  - (i) Seven (7) buffers, identified as P2PMB1, P2PMB2, P2PMB3, P2PMB4, P2PMB5, P2PMB6, and P2PMB7;
  - (j) Two (2) ½" chucks, identified as P2PMCH1 and P2PMCH2;
  - (k) One (1) air chisel, identified as P2MCAC1;
  - (l) Two (2) 14" body files, identified as P2PMBF1 and P2PMBF2;
  - (m) One (1) benchgrinder, identified as P2PMG1;
  - (n) One (1) drill press, identified as P2PMDP1;
  - (o) One (1) belt sander, identified as P2PMBL1;
  - (p) One (1) 12" band saw, identified as P2PMBS3;
  - (q) Two (2) spray guns, identified as P2MMSG3 and P2MMSG4, controlled by dry filters, exhausting to stacks C11, C12 and C13;
- (9) Plant 2 Mold Making Gel Area, consisting of one (1) spray gun, identified as P2MMSG1, with maximum capacity of 75.64 pounds of fiberglass per hour, making fiberglass components for the RV industry, controlled by a dry filter, exhausting to stack P4;
- (10) Plant 2 Mold Making Chop Area, consisting of one (1) spray gun, identified as P2MMSG1, with maximum capacity of 80.22 pounds of fiberglass per hour, making fiberglass components for the RV industry, controlled by a dry filter, exhausting to stack P4;
- (11) Plant 2 Steel Frame Making Area, consisting of one (1) 35 wire welding unit, identified as P2MFW1, exhausting to vent WELDX; and
- (12) Plant 2 Wood Insert Cutting Area, consisting of one (1) table saw, one (1) radial arm saw, one (1) band saw and one (1) 0.5 hp drill press, identified as P2WCFTS1, P2WCRS1, P2WCBS1, and P2WCDP1, controlled by a bag filter, exhausting to stack DCX2.

- (13) Plant 3 Surface Prep Area, consisting of two (2) dual action grinders, identified as P3DA1 and P3DA2;
- (14) Plant 3 Northeast Painting Area, consisting of two (2) spray guns, identified as P3SG1 and P3SG2, controlled by dry filters, exhausting to stacks P3X1 and P3X2; and
- (15) Plant 3 Southeast Painting Area, consisting of two (2) spray guns, identified as P3SG3 and P3SG4, controlled by dry filters, exhausting to stacks P3X3 and P3X4.

**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 also includes insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21).

- (1) Other categories with emissions below insignificant thresholds, including the following:
  - (a) Hand-held buffing, cutting, grinding, polishing, routing, sanding, surface grinding, and sawing.

**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);
- (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)]

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)]

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)]

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 July 1 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;
  - (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]

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- (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]

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- (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 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]**

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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)]**

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

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.2 Opacity [326 IAC 5-1]**

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

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

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

C.4 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.

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

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

C.6 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 units vented to the control equipment are in operation.

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

The Permittee shall comply with the provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

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.

**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 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.

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

#### **C.13 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 prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on November 4, 1996.
- (b) 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.
- (c) 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.

- (d) 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.
- (e) 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.14 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.15 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.16 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.17 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 annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 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 January 1 and ending December 31. 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.18 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]**

- (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.19 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, for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or local agency 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.20 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (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.21 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.
- (a) 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 Description [326 IAC 2-7-5(15)]

- (2) Plant 1 East Gel Area, consisting of one (1) spray gun, identified as P1EGSG1, with maximum capacity of 126.39 pounds of fiberglass per hour, making fiberglass components for the RV industry, controlled by dry filters, exhausting to stacks P1 and P2;
- (3) Plant 1 West Gel Area, consisting of one (1) spray gun, identified as P1WGSG1, with maximum capacity of 84 pounds of fiberglass per hour, making fiberglass components for the RV industry, controlled by dry filters, exhausting to stack P3;
- (4) Plant 1 East Chop Area, consisting of three (3) spray guns, identified as P1ECSG1, P1ECSG2, and P1ECSG3, with maximum capacity of 1,402 pounds of fiberglass per hour, making fiberglass components for the RV industry, controlled by dry filters, exhausting to stacks C2, C3, C4, C5, C6, C7 and C8;
- (5) Plant 1 West Chop Area, consisting of two (2) spray guns, identified as P1WCSG1 and P1WCSG2, with maximum capacity of 934 pounds of fiberglass per hour, making fiberglass components for the RV industry, controlled by dry filters, exhausting to stacks C9 and C10;
- (9) Plant 2 Mold Making Gel Area, consisting of one (1) spray gun, identified as P2MMSG1, with maximum capacity of 75.64 pounds of fiberglass per hour, making fiberglass components for the RV industry, controlled by a dry filter, exhausting to stack P4;
- (10) Plant 2 Mold Making Chop Area, consisting of one (1) spray gun, identified as P2MMSG1, with maximum capacity of 80.22 pounds of fiberglass per hour, making fiberglass components for the RV industry, controlled by a dry filter, exhausting to stack P4;

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

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

Pursuant to the 326 IAC 8-1-6 (General Reduction Requirements), operating conditions for the Plant 1 East Gel Area, Plant 1 West Gel Area, Plant 1 East Chop Area, Plant 1 West Chop Area, Plant 2 Mold Making Gel Area, and Plant 2 Mold Making Chop Area shall be the following:

- (a) Use of resins and gel coats shall be limited such that the potential to emit (PTE) volatile organic compound from resins and gel coats only shall be less than 100 tons per year for each operation, per twelve (12) consecutive months. Compliance with this limit shall be determined based upon the following criteria:
  - (1) Monthly usage by weight, monomer content, method of application, and other emission reduction techniques for each gel coat and resin shall be recorded. Volatile organic compound emissions shall be calculated by multiplying the usage of each gel coat and resin by the emission factor that is appropriate for the monomer content, method of application, and other emission reduction techniques for each gel coat and resin, and summing the emissions for all gel coats and resins. Emission factors shall be obtained from the reference approved by IDEM, OAM.
  - (2) Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA-approved form, emission factors shall be taken from the following reference approved by IDEM, OAM: "CFA Emission Models for the Reinforced Plastics Industries", Composites Fabricators Association, February 28, 1998, and shall not exceed 32.3% styrene emitted per weight of gel coat applied and 17.7% styrene emitted per weight of resin applied. For the purposes of these emission calculations, monomer in resins and gel coats that is not styrene shall be considered as styrene on an equivalent weight basis.

- (b) Resins and gel coats used, including filled resins and tooling resins and gel coats, shall be limited to maximum monomer contents of 35 percent (35%) by weight for resins, 37 percent (37%) by weight for gel coats or their equivalent on an emissions mass basis. Monomer contents shall be calculated on a neat basis, i.e., excluding any filler. Compliance with these monomer content limits shall be demonstrated on a monthly basis.

The use of resins with monomer contents lower than 35%, gel coats with monomer contents lower than 37%, and/or additional emission reduction techniques approved by IDEM, OAM, may be used to offset the use of resins with monomer contents higher than 35%, and/or gel coats with monomer contents higher than 37%. Examples of other techniques include, but are not limited to, lower monomer content resins and gel coats, closed molding, vapor suppression, vacuum bagging, controlled spraying, or installing a control device with an overall reduction efficiency of 95%. This is allowed to meet the monomer content limits for resins and gel coats, and shall be calculated on an equivalent emissions mass basis as shown below:

$$\frac{(\text{Emissions from } >35\% \text{ resin or } >37\% \text{ gel coat}) - (\text{Emissions from } 35\% \text{ resin or } 37\% \text{ gel coat})}{\# (\text{Emissions from } 35\% \text{ resin or } 37\% \text{ gel coat}) - (\text{Emissions from } <35\% \text{ resin, } <37\% \text{ gel coat, and/or other emission reduction techniques})}$$

Where: Emissions, lb or ton = M (mass of resin or gel coat used, lb or ton) \* EF (Monomer emission factor for resin or gel coat used, %);

EF, Monomer emission factor = emission factor, expressed as % styrene emitted per weight of resin applied, which is indicated by the monomer content, method of application, and other emission reduction techniques for each gel coat and resin used.

- (c) Flow coaters, a type of non-spray application technology of a design and specifications to be approved by IDEM, OAM, shall be used in the following manner:
- (1) To apply 50% of all neat resins within 6 months of issuance of this permit.
  - (2) To apply 100% of all neat resins used within 1 year of issuance of this permit.

If after 1 year of operation it is not possible to apply a portion of neat resins with flow coaters, equivalent emissions reductions must be obtained via use of other techniques, such as those listed in Condition D.1.1(b) above, elsewhere in the process.

- (d) Optimized spray techniques according to a manner approved by IDEM shall be used for gel coats and filled resins (where fillers are required for corrosion or fire retardant purposes) at all times. Optimized spray techniques include, but are not limited to, the use of airless, air-assisted airless, high volume low pressure (HVLP), or other spray applicators demonstrated to the satisfaction of IDEM, OAM, to be equivalent to the spray applicators listed above.

HVLP spray is the technology used to apply material to substrate by means of application equipment that operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

- (e) The listed work practices shall be followed:
- (1) To the extent possible, a non-VOC solvent shall be used for cleanup.
  - (2) Cleanup solvent containers used to transport solvent from drums to work stations shall be closed containers having soft gasketed spring-loaded closures.
  - (3) Cleanup rags saturated with solvent shall be stored, transported, and disposed of in containers that are closed tightly.
  - (4) The spray guns used shall be the type that can be cleaned without the need for spraying the solvent into the air.
  - (5) All solvent sprayed during cleanup or resin changes shall be directed into containers. Such containers shall be closed as soon as solvent spraying is complete and the waste solvent shall be disposed of in such a manner that evaporation is minimized.
  - (6) Storage containers used to store VOC-containing materials shall be kept covered when not in use.

**D.1.2 Particulate Matter (PM) [326 IAC 6-3-2(c)]**

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Pursuant to 326 IAC 6-3-2(c), the particulate matter emissions from the Plant 1 East Gel Area, Plant 1 West Gel Area, Plant 1 East Chop Area, Plant 1 West Chop Area, Plant 2 Mold Making Gel Area, and Plant 2 Mold Making Chop Area shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

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:

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

**D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]**

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

**Compliance Determination Requirements**

**D.1.4 Testing Requirements [326 IAC 2-7-6(1),(6)]**

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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 facilities are in compliance. If testing is required by IDEM, compliance with the Volatile Organic Compound (VOC) and Particulate Matter (PM) limits specified in Conditions D.1.1 and D.1.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

#### D.1.5 Volatile Organic Compound (VOC)

Compliance with the monomer content and usage limitations contained in Condition D.1.1 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 manufacturer. However, 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.1.6 VOC Emissions

Compliance with Condition D.1.1 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.

#### D.1.7 Particulate Matter (PM)

The dry filters for PM control shall be in operation at all times when Plant 1 East Gel Area, Plant 1 West Gel Area, Plant 1 East Chop Area, Plant 1 West Chop Area, Plant 2 Mold Making Gel Area, and Plant 2 Mold Making Chop Area are in operation.

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

#### D.1.8 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the Plant 1 East Gel Area, Plant 1 West Gel Area, Plant 1 East Chop Area, Plant 1 West Chop Area, Plant 2 Mold Making Gel Area, and Plant 2 Mold Making Chop Area stacks (P1-P4 and C2-C10) while one or more of the areas 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 stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit 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.

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

#### D.1.9 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) 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.1.1.
  - (1) The usage by weight and monomer content of each resin and gel coat. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used;
  - (2) A log of the dates of use;

- (3) Method of application and other emission reduction techniques for each resin and gel coat used;
  - (4) The calculated total volatile organic compound emissions from resin and gel coat use for each month.
- (b) To document compliance with Condition D.1.8, 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) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.1.10 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1(a) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

## SECTION D.2 FACILITY OPERATION CONDITIONS

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

- (1) Plant 1 Mold Prep Area, including:
  - (a) Three (3) die grinders, identified as P1MPDG1, P1MPDG2 and P1MPDG3;
  - (b) One (1) air drill, identified as P1MPAD1;
  - (c) One (1) "small" grinder, identified as P1MPG1;
  - (d) Five (5) buffers, identified as P1MPB1, P1MPB2, P1MPB3, P1MPB4 and P1MPB5;
  - (e) Three (3) spray guns spraying mold releases and tooling gel (tooling gel for repair of molds only), controlled by dry filters, exhausting to stacks C2, C3, C4, C5, C6, C7 and C8; and
  - (f) Hand application of waxes, controlled by dry filters, exhausting to stacks C2, C3, C4, C5, C6, C7 and C8;
- (7) Plant 1 Final Finish Area, consisting of the following:
  - (a) Eleven (11) dual action grinders, identified as P1FFDA1, P1FFDA2, P1FFDA3, P1FFDA4, P1FFDA5, P1FFDA6, P1FFDA7, P1FFDA8, P1FFDA9, P1FFDA10, and P1FFDA11, controlled by dry filters, exhausting to stacks FF1 and FF2;
  - (b) Eight (8) buffers, identified as P1FFB1, P1FFB2, P1FFB3, P1FFB4, P1FFB5, P1FFB6, P1FFB7 and P1FFB8, controlled by dry filters, exhausting to stacks FF1 and FF2;
  - (c) Five (5) die grinders, identified P1FFDG1, P1FFDG2, P1FFDG3, P1FFDG4, and P1FFDG5, controlled by dry filters, exhausting to stacks FF1 and FF2;
  - (d) Two (2) 5" grinders, identified as P1FF5G1 and P1FF5G2, controlled by dry filters, exhausting to stacks FF1 and FF2;
  - (e) Eight (8) spray guns, identified as Emission Units P1FFSG1, P1FFSG2, P1FFSG3, P1FFSG4, P1FFSG5, P1FFSG6, P1FFSG7, and P1FFSG8, controlled by dry filters, exhausting to stacks FF1 and FF2; and
  - (f) Hand application of waxes and fillers, exhausting to stacks FF1 and FF2;
- (8) Plant 2 Pattern/Plug Making Area, consisting of the following:
  - (a) One (1) saber saw, identified as P2PMSS1;
  - (b) Two (2) cutter saws, identified as P2PMCS1 and P2PMSC2;
  - (c) Two (2) band saws, identifies as P2PMBS1 and P2PMBS2;
  - (d) Three (3) 5" grinders, identified as P2PM5G1, P2PM5G2, and P2M5G3;
  - (e) One (1) drill, identified as P2PMDR1;
  - (f) Three (3) die grinders, identified as P2PMDG1, P2PMDG2, and P2PMDG3;
  - (g) One (1) table saw, identified as P2PMTS1;
  - (h) Three (3) dual action grinders, identified as P2PMDG1, P2PMDG2, and P2PMDG3;
  - (i) Seven (7) buffers, identified as P2PMB1, P2PMB2, P2PMB3, P2PMB4, P2PMB5, P2PMB6, and P2PMB7;
  - (j) Two (2) ½" chucks, identified as P2PMCH1 and P2PMCH2;
  - (k) One (1) air chisel, identified as P2MCAC1;
  - (l) Two (2) 14" body files, identified as P2PMBF1 and P2PMBF2;
  - (m) One (1) benchgrinder, identified as P2PMG1;
  - (n) One (1) drill press, identified as P2PMDP1;
  - (o) One (1) belt sander, identified as P2PMBL1;
  - (p) One (1) 12" band saw, identified as P2PMBS3;
  - (q) Two (2) spray guns, identified as P2MMSG3 and P2MMSG4, controlled by dry filters, exhausting to stacks C11, C12 and C13;
- (14) Plant 3 Northeast Painting Area, consisting of two (2) spray guns, identified as P3SG1 and P3SG2, controlled by dry filters, exhausting to stacks P3X1 and P3X2; and
- (15) Plant 3 Southeast Painting Area, consisting of two (2) spray guns, identified as P3SG3 and P3SG4, controlled by dry filters, exhausting to stacks P3X3 and P3X4.

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

### **D.2.1 Volatile Organic Compound (VOC) [326 IAC 8-1-6]**

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- (a) The three (3) spray guns and hand application of waxes in the Plant 1 Mold Prep Area, the eight spray guns and hand application of waxes in the Plant 1 Final Finish Area, the two (2) spray guns in the Plant 2 Pattern/Plug Making Area, the Plant 3 Northeast Painting Area, and the Plant 3 Southeast Painting Area shall have a limited potential to emit Volatile Organic Compound (VOC) of less than twenty-five (25) tons per 12 month period for each of these five (5) operations.
- (b) The limits established in (a) shall make the requirements of 326 IAC 8-1-6 (General Reduction Requirements) not applicable.
- (c) Any change or modification to any of these facilities that would cause emissions of VOC to be greater than 25 tons per year for any one of these operations, will require prior approval by OAM.

### **D.2.2 Particulate Matter (PM) [326 IAC 6-3-2(c)]**

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Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from Plant 1 Mold Prep Area, Plant 1 Final Finish Area, Plant 2 Pattern/Plug Making Area, Plant 3 Northeast Painting Area, and the Plant 3 Southeast Painting Area shall not exceed the pounds per hour limitation as 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.2.3 Hazardous Air Pollutant (HAP) [326 IAC 2-1-3.4]**

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Pursuant to 326 IAC 2-1-3.4 (New Source Toxics Control), the Plant 3 Northeast Painting Area and the Plant 3 Southeast Painting Area shall each have a limited potential to emit of ten (10) tons of any single Hazardous Air Pollutant (HAP) per year and twenty-five (25) tons per year for all HAPs.

### **D.2.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]**

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

## **Compliance Determination Requirements**

### **D.2.5 Testing Requirements [326 IAC 2-7-6(1),(6)]**

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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 facilities are in compliance. If testing is required by IDEM, compliance with the Volatile Organic Compound (VOC), Particulate Matter (PM) or Hazardous Air Pollutant (HAP) limits specified in Conditions D.2.1, D.2.2 and D.2.3 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

### **D.2.6 Volatile Organic Compound (VOC) and Hazardous Air Pollutant (HAP)**

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Compliance with the Volatile Organic Compound (VOC) and Hazardous Air Pollutant (HAP) content and usage limitations contained in Conditions D.2.1 and D.2.3 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 manufacturer. However, 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.2.7 Particulate Matter (PM)

The dry filters for PM control shall be in operation at all times when Plant 1 Mold Prep Area, Plant 1 Final Finish Area, Plant 2 Pattern/Plug Making Area, Plant 3 Northeast Painting Area, and the Plant 3 Southeast Painting Area are in operation.

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

#### D.2.8 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the Plant 1 Mold Prep Area, Plant 1 Final Finish Area, Plant 2 Pattern/Plug Making Area, Plant 3 Northeast Painting Area, and the Plant 3 Southeast Painting Area stacks (C2-C8, C11-C13, FF1-FF2, and P3X1-P3X4) 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 stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit 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.

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

#### D.2.9 Record Keeping Requirements

- (a) To document compliance with Conditions D.2.1 and D.2.3, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAP usage limits and/or the VOC and HAP emission limits established in Conditions D.2.1 and D.2.3.
  - (1) The amount and VOC and HAP content of each coating material, resin 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 cleanup solvent usage for each month;
  - (4) The total VOC and HAP usage per unit and the number of each type of unit produced per month; and
  - (5) The weight of VOCs and HAPs emitted for each compliance period.
- (b) To document compliance with Condition D.2.8, 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) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.2.10 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.2.1 and D.2.3 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

### SECTION D.3 FACILITY OPERATION CONDITIONS

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

- (6) Plant 1 Grinding Area, consisting of the following:
  - (a) Three (3) die grinders, identified as P1GDG1, P1GDG2, and P1GDG3, controlled by a dust collector (DC1), exhausting to stack DCX1;
  - (b) Two (2) 5" surface grinders, identified as P1G5SG1, P1G5SG2, controlled by a dust collector (DC1), exhausting to stack DCX1;
  - (c) Four (4) pneumatic cutters, identified as P1GCUT1, P1GCUT2, P1GCUT3, and P1GCUT4, controlled by a dust collector (DC1), exhausting to stack DCX1;
  - (d) One (1) hand-held circular saw, identified as P1GCS1, controlled by a dust collector (DC1), exhausting to stack DCX1;
  - (e) Two (2) air drills, identified as P1GAD1 and P1GAD2, controlled by a dust collector (DC1), exhausting to stack DCX1;
  - (f) Three (3) angle sanders, identified as P1GAS1, P1GAS2, and P1GAS3, controlled by a dust collector, exhausting to stack DCX1;
  - (g) One (1) mini-die grinder, identified as P1GMDG1, controlled by a dust collector (DC1), exhausting to stack DCX1;
- (11) Plant 2 Steel Frame Making Area, consisting of one (1) 35 wire welding unit, identified as P2MFW1, exhausting to vent WELDX; and
- (12) Plant 2 Wood Insert Cutting Area, consisting of one (1) table saw, one (1) radial arm saw, one (1) band saw and one (1) 0.5 hp drill press, identified as P2WCFTS1, P2WCRS1, P2WCBS1, and P2WCDP1, controlled by a bag filter, exhausting to stack DCX2.
- (13) Plant 3 Surface Prep Area, consisting of two (2) dual action grinders, identified as P3DA1 and P3DA2;

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

##### D.3.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from Plant 1 Grinding Area, Plant 2 Steel Frame Making Area, Plant 2 Wood Insert Cutting Area, and Plant 3 Surface Prep Area shall not exceed the pounds per hour limitation as 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:

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

#### Compliance Determination Requirements

##### D.3.2 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 facilities are in compliance. If testing is required by IDEM, compliance with the Particulate Matter (PM) limit specified in Condition D.3.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

#### D.3.3 Particulate Matter (PM)

The bag filter and dust collector for PM control shall be in operation at all times when Plant 1 Grinding Area, Plant 2 Steel Frame Making Area, Plant 2 Wood Insert Cutting Area, and Plant 3 Surface Prep Area are in operation.

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

#### D.3.4 Monitoring

Monitoring of these facilities is not specifically required by this permit. However, any change or modification to these facilities, as specified in 326 IAC 2-1 (Construction and Operating Permit Requirements), may require these facilities to have monitoring requirements.

## SECTION D.4 FACILITY OPERATION CONDITIONS

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

Insignificant Activities:

- (2) Other categories with emissions below insignificant thresholds, including the following:
  - (a) Hand-held buffing, cutting, grinding, polishing, routing, sanding, surface grinding, and sawing.

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

#### D.4.1 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the insignificant grinding and sanding operations shall not exceed allowable PM emission rate based on 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:

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

### Compliance Determination Requirements

#### D.4.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility 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 PM limit specified in Condition D.4.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

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

**PART 70 OPERATING PERMIT  
CERTIFICATION**

Source Name: Bremen Technologies, Inc., Plants 1 and 2  
Source Address: 425 Industrial Drive (Plant 1), 1729 West Dewey (Plant 2), 1726 West Bike  
(Plant 3), Bremen, Indiana 46506  
Mailing Address 425 Industrial Drive, Bremen, Indiana 46506  
Part 70 Permit No.: T099-7078-00036

**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: Bremen Technologies, Inc., Plants 1 and 2  
Source Address: 425 Industrial Drive (Plant 1), 1729 West Dewey (Plant 2), 1726 West Bike, (Plant 3), Bremen, Indiana 46506  
Mailing Address 425 Industrial Drive, Bremen, Indiana 46506  
Part 70 Permit No.: T099-7078-00036

**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 OPERATING PERMIT  
 QUARTERLY COMPLIANCE MONITORING REPORT**

Source Name: Bremen Technologies, Inc., Plants 1, 2 and 3  
 Source Address: 425 Industrial Drive (Plant 1), 1729 West Dewey (Plant 2), 1726 West Bike (Plant 3), Bremen, Indiana 46506  
 Mailing Address: 425 Industrial Drive, Bremen, Indiana 46506  
 Part 70 Permit No.: T099-7078-00036

**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.**

Compliance Monitoring Requirement (e.g. Permit Condition D.1.3)	Number of Deviations	Date of each Deviation

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 Monthly Report (3 pages)**

Source Name: Bremen Technologies, Inc., Plants 1, 2 and 3  
 Source Address: 425 Industrial Drive (Plant 1), 1729 West Dewey (Plant 2), 1726 West Bike (Plant 3), Bremen, Indiana 46506  
 Mailing Address: 425 Industrial Drive, Bremen, Indiana 46506  
 Part 70 Permit No.: T099-7078-00036  
 Facility: Plants 1, 2, and 3  
 Parameter: VOC emissions  
 Limit: see chart

Month: \_\_\_\_\_

<b>Process/Facility</b>	<b>VOC usage limit (tons/yr)</b>	<b>VOC usage this month (tons)</b>	<b>VOC usage past 11 months (tons) [not including this month]</b>	<b>Total VOC usage past 12 months [this month + past 11 months] (tons)</b>
Plant 1 Mold Prep Area	less than 25			
Plant 1 East Gel Area	less than 100			
Plant 1 West Gel Area	less than 100			
Plant 1 East Chop Area	less than 100			
Plant 1 West Chop Area	less than 100			
Plant 1 Final Finish Area	less than 25			
Plant 2 Pattern/Plug Making Area	less than 25			
Plant 2 Mold Making Gel Area	less than 100			
Plant 2 Mold Making Chop Area	less than 100			
Plant 3 Northeast Painting Area	less than 25			
Plant 3 Southeast Painting Area	less than 25			
<b>TOTAL</b>	less than 250			

9 No deviation occurred in this month.

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

Month: \_\_\_\_\_

<b>Process/Facility</b>	<b>VOC usage limit (tons/yr)</b>	<b>VOC usage this month (tons)</b>	<b>VOC usage past 11 months (tons) [not including this month]</b>	<b>Total VOC usage past 12 months [this month + past 11 months] (tons)</b>
Plant 1 Mold Prep Area	less than 25			
Plant 1 East Gel Area	less than 100			
Plant 1 West Gel Area	less than 100			
Plant 1 East Chop Area	less than 100			
Plant 1 West Chop Area	less than 100			
Plant 1 Final Finish Area	less than 25			
Plant 2 Pattern/Plug Making Area	less than 25			
Plant 2 Mold Making Gel Area	less than 100			
Plant 2 Mold Making Chop Area	less than 100			
Plant 3 Northeast Painting Area	less than 25			
Plant 3 Southeast Painting Area	less than 25			
<b>TOTAL</b>	less than 250			

- 9 No deviation occurred in this month.
- 9 Deviation/s occurred in this month. Deviation has been reported on: \_\_\_\_\_

Month: \_\_\_\_\_

Process/Facility	VOC usage limit (tons/yr)	VOC usage this month (tons)	VOC usage past 11 months (tons) [not including this month]	Total VOC usage past 12 months [this month + past 11 months] (tons)
Plant 1 Mold Prep Area	less than 25			
Plant 1 East Gel Area	less than 100			
Plant 1 West Gel Area	less than 100			
Plant 1 East Chop Area	less than 100			
Plant 1 West Chop Area	less than 100			
Plant 1 Final Finish Area	less than 25			
Plant 2 Pattern/Plug Making Area	less than 25			
Plant 2 Mold Making Gel Area	less than 100			
Plant 2 Mold Making Chop Area	less than 100			
Plant 3 Northeast Painting Area	less than 25			
Plant 3 Southeast Painting Area	less than 25			
<b>TOTAL</b>	less than 250			

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 Monthly Report (2 pages)**

Source Name: Bremen Technologies, Inc., Plants 1, 2 and 3  
 Source Address: 425 Industrial Drive (Plant 1), 1729 West Dewey (Plant 2), 1726 West Bike (Plant 3), Bremen, Indiana 46506  
 Mailing Address: 425 Industrial Drive, Bremen, Indiana 46506  
 Part 70 Permit No.: T099-7078-00036  
 Facility: Plant 3  
 Parameter: HAP emissions  
 Limit: see chart

Month: \_\_\_\_\_

Process/Facility	HAP usage limit (tons/yr)	HAP usage this month (tons)	HAP usage past 11 months (tons) [not including this month]	Total HAP usage past 12 months [this month + past 11 months] (tons)
Plant 3 Northeast Painting Area (Single Worst HAP)	less than 10			
Plant 3 Northeast Painting Area (All HAPs)	less than 25			
Plant 3 Southeast Painting Area (Single Worst HAP)	less than 10			
Plant 3 Southeast Painting Area (All HAPs)	less than 25			

- 9 No deviation occurred in this month.
- 9 Deviation/s occurred in this month. Deviation has been reported on: \_\_\_\_\_

Month: \_\_\_\_\_

Process/Facility	HAP usage limit (tons/yr)	HAP usage this month (tons)	HAP usage past 11 months (tons) [not including this month]	Total HAP usage past 12 months [this month + past 11 months] (tons)
Plant 3 Northeast Painting Area (Single Worst HAP)	less than 10			
Plant 3 Northeast Painting Area (All HAPs)	less than 25			
Plant 3 Southeast Painting Area (Single Worst HAP)	less than 10			
Plant 3 Southeast Painting Area (All HAPs)	less than 25			

9 No deviation occurred in this month.

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

Month: \_\_\_\_\_

Process/Facility	HAP usage limit (tons/yr)	HAP usage this month (tons)	HAP usage past 11 months (tons) [not including this month]	Total HAP usage past 12 months [this month + past 11 months] (tons)
Plant 3 Northeast Painting Area (Single Worst HAP)	less than 10			
Plant 3 Northeast Painting Area (All HAPs)	less than 25			
Plant 3 Southeast Painting Area (Single Worst HAP)	less than 10			
Plant 3 Southeast Painting Area (All HAPs)	less than 25			

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

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

### Source Background and Description

<b>Source Name:</b>	Bremen Technologies, Inc., Plants 1, 2 and 3
<b>Source Location:</b>	425 Industrial Drive (Plant 1), 1729 West Dewey (Plant 2), 1726 West Bike (Plant 3), Bremen, Indiana 46506
<b>County:</b>	Marshall County
<b>SIC Code:</b>	3711, 3713, 3714
<b>Operation Permit No.:</b>	T099-7078-00036
<b>Permit Reviewer:</b>	Catherine Moore

The Office of Air Management (OAM) has reviewed a Part 70 permit application from Bremen Motor Corporation, Plants 1, 2 and 3, relating to the operation of a manufacturing plant for fiberglass components used in the automotive, recreational vehicle and van conversion industries.

### Source Definition

This fiberglass components manufacturing company consists of three (3) plants:

- (1) Plant 1 is located at 425 Industrial Drive, Bremen, Indiana 46506;
- (2) Plant 2 is located at 1729 West Dewey, Bremen, Indiana 46506; and
- (3) Plant 3 is located at 1726 West Bike, Bremen, Indiana 46506.

Since the three (3) plants are located on contiguous properties, have the same SIC codes and are owned by one (1) company, they will be considered one (1) source.

### Permitted Emission Units and Pollution Control Equipment

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

- (1) Plant 3 Surface Prep Area, consisting of two (2) dual action grinders, identified as P3DA1 and P3DA2;
- (2) Plant 3 Northeast Painting Area, consisting of two (2) spray guns, identified as P3SG1 and P3SG2, controlled by dry filters, exhausting to stacks P3X1 and P3X2; and
- (3) Plant 3 Southeast Painting Area, consisting of two (2) spray guns, identified as P3SG3 and P3SG4, controlled by dry filters, exhausting to stacks P3X3 and P3X4.

### Unpermitted Emission Units and Pollution Control Equipment Under ENSR

The source consists of the following unpermitted facilities/units:

- (1) Plant 1 Mold Prep Area, including:
  - (a) Three (3) die grinders, identified as P1MPDG1, P1MPDG2 and P1MPDG3;

- (b) One (1) air drill, identified as P1MPAD1;
  - (c) One (1) "small" grinder, identified as P1MPG1;
  - (d) Five (5) buffers, identified as P1MPB1, P1MPB2, P1MPB3, P1MPB4 and P1MPB5;
  - (e) Three (3) spray guns spraying mold releases and tooling gel (tooling gel for repair of molds only), controlled by dry filters, exhausting to stacks C2, C3, C4, C5, C6, C7 and C8; and
  - (f) Hand application of waxes, controlled by dry filters, exhausting to stacks C2, C3, C4, C5, C6, C7 and C8;
- (2) Plant 1 East Gel Area, consisting of one (1) spray gun, identified as P1EGSG1, with maximum capacity of 126.39 pounds of fiberglass per hour, making fiberglass components for the RV industry, controlled by dry filters, exhausting to stacks P1 and P2;
- (3) Plant 1 West Gel Area, consisting of one (1) spray gun, identified as P1WGSG1, with maximum capacity of 84 pounds of fiberglass per hour, making fiberglass components for the RV industry, controlled by dry filters, exhausting to stack P3;
- (4) Plant 1 East Chop Area, consisting of three (3) spray guns, identified as P1ECSG1, P1ECSG2, and P1ECSG3, with maximum capacity of 1,402 pounds of fiberglass per hour, making fiberglass components for the RV industry, controlled by dry filters, exhausting to stacks C2, C3, C4, C5, C6, C7 and C8;
- (5) Plant 1 West Chop Area, consisting of two (2) spray guns, identified as P1WCSG1 and P1WCSG2, with maximum capacity of 934 pounds of fiberglass per hour, making fiberglass components for the RV industry, controlled by dry filters, exhausting to stacks C9 and C10;
- (6) Plant 1 Grinding Area, consisting of the following:
- (a) Three (3) die grinders, identified as P1GDG1, P1GDG2, and P1GDG3, controlled by a dust collector (DC1), exhausting to stack DCX1;
  - (b) Two (2) 5" surface grinders, identified as P1G5SG1, P1G5SG2, controlled by a dust collector (DC1), exhausting to stack DCX1;
  - (c) Four (4) pneumatic cutters, identified as P1GCUT1, P1GCUT2, P1GCUT3, and P1GCUT4, controlled by a dust collector (DC1), exhausting to stack DCX1;
  - (d) One (1) hand-held circular saw, identified as P1GCS1, controlled by a dust collector (DC1), exhausting to stack DCX1;
  - (e) Two (2) air drills, identified as P1GAD1 and P1GAD2, controlled by a dust collector (DC1), exhausting to stack DCX1;
  - (f) Three (3) angle sanders, identified as P1GAS1, P1GAS2, and P1GAS3, controlled by a dust collector, exhausting to stack DCX1;
  - (g) One (1) mini-die grinder, identified as P1GMDG1, controlled by a dust collector (DC1), exhausting to stack DCX1;

- (7) Plant 1 Final Finish Area, consisting of the following:
  - (a) Eleven (11) dual action grinders, identified as P1FFDA1, P1FFDA2, P1FFDA3, P1FFDA4, P1FFDA5, P1FFDA6, P1FFDA7, P1FFDA8, P1FFDA9, P1FFDA10, and P1FFDA11, controlled by dry filters, exhausting to stacks FF1 and FF2;
  - (b) Eight (8) buffers, identified as P1FFB1, P1FFB2, P1FFB3, P1FFB4, P1FFB5, P1FFB6, P1FFB7 and P1FFB8, controlled by dry filters, exhausting to stacks FF1 and FF2;
  - (c) Five (5) die grinders, identified P1FFDG1, P1FFDG2, P1FFDG3, P1FFDG4, and P1FFDG5, controlled by dry filters, exhausting to stacks FF1 and FF2;
  - (d) Two (2) 5" grinders, identified as P1FF5G1 and P1FF5G2, controlled by dry filters, exhausting to stacks FF1 and FF2;
  - (e) Eight (8) spray guns, identified as Emission Units P1FFSG1, P1FFSG2, P1FFSG3, P1FFSG4, P1FFSG5, P1FFSG6, P1FFSG7, and P1FFSG8, controlled by dry filters, exhausting to stacks FF1 and FF2; and
  - (f) Hand application of waxes and fillers, exhausting to stacks FF1 and FF2;
- (8) Plant 2 Pattern/Plug Making Area, consisting of the following:
  - (a) One (1) saber saw, identified as P2PMSS1;
  - (b) Two (2) cutter saws, identified as P2PMCS1 and P2PMSC2;
  - (c) Two (2) band saws, identifies as P2PMBS1 and P2PMBS2;
  - (d) Three (3) 5" grinders, identified as P2PM5G1, P2PM5G2, and P2M5G3;
  - (e) One (1) drill, identified as P2PMDR1;
  - (f) Three (3) die grinders, identified as P2PMDG1, P2PMDG2, and P2PMDG3;
  - (g) One (1) table saw, identified as P2PMTS1;
  - (h) Three (3) dual action grinders, identified as P2PMDG1, P2PMDG2, and P2PMDG3;
  - (i) Seven (7) buffers, identified as P2PMB1, P2PMB2, P2PMB3, P2PMB4, P2PMB5, P2PMB6, and P2PMB7;
  - (j) Two (2) ½" chucks, identified as P2PMCH1 and P2PMCH2;
  - (k) One (1) air chisel, identified as P2MCAC1;
  - (l) Two (2) 14" body files, identified as P2PMBF1 and P2PMBF2;
  - (m) One (1) benchgrinder, identified as P2PMG1;
  - (n) One (1) drill press, identified as P2PMDP1;
  - (o) One (1) belt sander, identified as P2PMBL1;
  - (p) One (1) 12" band saw, identified as P2PMBS3;

- (q) Two (2) spray guns, identified as P2MMSG3 and P2MMSG4, controlled by dry filters, exhausting to stacks C11, C12 and C13;
- (9) Plant 2 Mold Making Gel Area, consisting of one (1) spray gun, identified as P2MMSG1, with maximum capacity of 75.64 pounds of fiberglass per hour, making fiberglass components for the RV industry, controlled by a dry filter, exhausting to stack P4;
- (10) Plant 2 Mold Making Chop Area, consisting of one (1) spray gun, identified as P2MMSG1, with maximum capacity of 80.22 pounds of fiberglass per hour, making fiberglass components for the RV industry, controlled by a dry filter, exhausting to stack P4;
- (11) Plant 2 Steel Frame Making Area, consisting of one (1) 35 wire welding unit, identified as P2MFW1, exhausting to vent WELDX; and
- (12) Plant 2 Wood Insert Cutting Area, consisting of one (1) table saw, one (1) radial arm saw, one (1) band saw and one (1) 0.5 hp drill press, identified as P2WCFTS1, P2WCRS1, P2WCBS1, and P2WCDP1, controlled by a bag filter, exhausting to stack DCX2.

### **New Emission Units and Pollution Control Equipment ENSR**

There are no new facilities to be reviewed under the ENSR process.

### **Insignificant Activities**

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

- (1) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour. (Units heaters, H1-H8, H9-H20, H27-H28, and make-up units, M1-M3)
- (2) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughput less than 12,000 gallons. (T1, containing polyester resin, and T-2, containing acetone)
- (3) Solvent recycling systems with batch capacity less than or equal to 100 gallons. (PC2)
- (4) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (5) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (6) Other categories with emissions below insignificant thresholds, including the following:
  - (a) Hand-held buffing, cutting, grinding, polishing, routing, sanding, surface grinding, and sawing.

### **Existing Approvals**

The source was constructed without a permit in 1980 and submitted an operation permit application for the facilities at Plant #1 on October 15, 1991. IDEM did not act on the operation permit application due to implementation of the Part 70 permit program, therefore the Plant 1 and Plant 2 facilities have been given no prior approval to construct or to operate by OAM. Registration (CP099-10008-00036) was issued September 15, 1998 to cover the facilities located in Plant 3.

### Enforcement Issue

- (a) IDEM is aware that this source has been constructed 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 complete Part 70 permit application for the purposes of this review was received on November 4, 1996.

A notice of completeness was mailed to the source on November 15, 1996.

### 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 250
PM-10	greater than 250
SO <sub>2</sub>	less than 100
VOC	greater than 250
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)
Styrene	greater than 25
MEK	less than 10
Methyl Methacrylate	less than 10
Hydroquinone	less than 10
Glycol Ether	less than 10
TOTAL	greater than 25

- (a) The potential emissions (as defined in the Indiana Rule) of VOC are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential emissions (as defined in Indiana Rule) of any single HAP is equal to or greater than ten (10) tons per year and the potential emissions (as defined in Indiana Rule) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

- (c) **Fugitive Emissions**  
 Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

**Actual Emissions**

The following table shows the actual emissions from the source. This information reflects the 1995 source emission data.

Pollutant	Actual Emissions (tons/year)
PM	4.38
PM-10	not available
SO <sub>2</sub>	not available
VOC (non HAP)	7.30
CO	not available
NO <sub>x</sub>	not available
HAP (Toluene)	0.20
HAP (Xylene)	0.03
HAP (Styrene)	68.40
HAP (MEK)	0.34
HAP (Methyl Methacrylate)	0.53
HAP (Hydro Quinone)	0.06
HAP (Glycol Ether)	0.53
HAP (Cumene)	0.01

**Limited Potential to Emit**

The table below summarizes the total limited potential to emit of the significant emission units.

Process/facility	Limited Potential to Emit (tons/year)		
	HAP	VOC	PM
Plant 1 Mold Prep Area	-	less than 25	less than 250
Plant 1 East Gel Area	-	less than 100	
Plant 1 West Gel Area	-	less than 100	
Plant 1 East Chop Area	-	less than 100	
Plant 1 West Chop Area	-	less than 100	
Plant 1 Grinding Area	-	0	
Plant 1 Final Finish Area	-	less than 25	
Plant 2 Pattern/Plug Making Area	-	less than 25	
Plant 2 Mold Making Gel Area	-	less than 100	
Plant 2 Mold Making Chop Area	-	less than 100	

Plant 2 Steel Frame Making Area	-	0	
Plant 2 Wood Insert Cutting Area	-	0	
Plant 3 Surface Prep Area	-	0	
Plant 3 Northeast Painting Area	less than 10 (single HAP)  less than 25 (all HAPs)	less than 25	
Plant 3 Southeast Painting Area	less than 10 (single HAP)  less than 25 (all HAPs)	less than 25	
Total Source Emissions	-	less than 250	less than 250

**County Attainment Status**

The source is located in Marshall County.

Pollutant	Status
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 (NO<sub>x</sub>) 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. Marshall County has been designated as attainment or unclassifiable for ozone.

**Federal Rule Applicability**

- (a) Tanks T1 and T2 are not subject to New Source Performance Standard, 326 IAC 12, (40 CFR 60.116b, Subpart Kb). The tanks have capacities of 4,400 and 1,000 gallons respectively, both smaller than the 10,567 gallon (40 m<sup>3</sup>) applicability level for requirements of the rule, and were constructed after the July 23, 1984 applicability date.
- (b) This source may be subject to the National Emission Standards for Hazardous Air Pollutants for Reinforced Plastics Composites Production (40 CFR Part 63), upon promulgation.

**State Rule Applicability - Entire Source**

326 IAC 1-6-3 (Preventive Maintenance Plan)

The source has submitted a Preventive Maintenance Plan (PMP) on November 4, 1996. This PMP has been verified to fulfill the requirements of 326 IAC 1-6-3 (Preventive Maintenance Plan).

**326 IAC 1-5-2 (Emergency Reduction Plans)**

The source has submitted an Emergency Reduction Plan (ERP) on November 4, 1996. The ERP has been verified to fulfill the requirements of 326 IAC 1-5-2 (Emergency Reduction Plans).

**326 IAC 2-2 (Prevention of Significant Deterioration)**

The source has accepted a limit on emissions of particulate matter (PM) and volatile organic compound (VOC) of less than 250 tons per year, for the entire source. Therefore, 326 IAC 2-2 (PSD) is not applicable.

The dust collector used for Particulate Matter (PM) control in Plant 1 Grinding Area, the dry filters used for Particulate Matter (PM) control in Plant 1 Final Finishing Area, Plant 2 Mold Making Gel Area, Plant 2 Mold Making Chop Area, Plant 3 Northeast Painting Area and Plant 3 Southeast Painting Area and the bag filter in the Plant 2 Wood Insert Cutting Area shall operate at all times these facilities are in operation to ensure compliance with this requirement.

Each facility that has the potential to emit Volatile Organic Compound (VOC) has an individual limited potential to emit. Therefore, the source shall keep records to ensure that the source-wide Volatile Organic Compound (VOC) emissions are less than two hundred fifty (250) tons per year.

**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 one hundred (100) tons per year of Volatile Organic Compound (VOC). 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 July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal shall 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 6-3-2 (Process Operations)**

The particulate matter (PM) overspray from the Plant 1 Mold Prep Area, the Plant 1 East Gel Area, the Plant 1 West Gel Area, the Plant 1 East Chop Area, the Plant 1 West Chop Area, the Plant 1 Grinding Area, the Plant 1 Final Finish Area, the Plant 2 Pattern/Plug Making Area, the Plant 2 Mold Making Gel Area, the Plant 2 Mold Making Chop Area, the Plant 2 Steel Frame Making Area, the Plant 2 Wood Insert Cutting Area, the Plant 3 Surface Prep Area, the Plant 3 Northeast Painting Area, the Plant 3 Southeast Painting Area and the insignificant grinding operations 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:

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

The dust collector used for Particulate Matter (PM) control in Plant 1 Grinding Area, the dry filters used for Particulate Matter (PM) control in Plant 1 Final Finishing Area, Plant 2 Mold Making Gel Area, Plant 2 Mold Making Chop Area, Plant 3 Northeast Painting Area and Plant 3 Southeast Painting Area and the bag filter in the Plant 2 Wood Insert Cutting Area shall operate at all times these facilities are in operation to ensure compliance with this requirement.

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

- (a) The three (3) spray guns and hand application of waxes in the Plant 1 Mold Prep Area, the eight spray guns and hand application of waxes in the Plant 1 Final Finish Area, the two (2) spray guns in the Plant 2 Pattern/Plug Making Area, the Plant 3 Northeast Painting Area, and the Plant 3 Southeast Painting Area were all constructed after January 1, 1980 and have potential VOC emission greater than 25 tons per year each. Therefore, the source has accepted VOC limits of less than twenty-five (25) tons per 12 month period for each of these five (5) operations so that 326 IAC 8-1-6 (General Reduction Requirements) does not apply. Any change or modification to any of these facilities that would cause emissions of VOC to be greater than 25 tons per year for any one of these operations, will require prior approval by OAM.
- (b) The Plant 1 East Gel Area, Plant 1 West Gel Area, Plant 1 East Chop Area, Plant 1 West Chop Area, Plant 2 Mold Making Gel Area, and the Plant 2 Mold Making Chop Area are all subject to the requirements of 326 IAC 8-1-6 (General Reduction Requirements) because they were all constructed after January 1, 1980 and each have the potential to emit Volatile Organic Compound (VOC) of greater than twenty-five (25) tons per year.

Pursuant to 326 IAC 8-1-6 (General Reduction Requirements), each facility shall comply with the following presumptive Best Available Control Technology (BACT):

- (1) Use of resins and gel coats shall be limited such that the potential to emit (PTE) volatile organic compound from resins and gel coats only shall be less than 100 tons per year, per twelve (12) consecutive months. Compliance with this limit shall be determined based upon the following criteria:
  - (A) Monthly usage by weight, monomer content, method of application, and other emission reduction techniques for each gel coat and resin shall be recorded. Volatile organic compound emissions shall be calculated by multiplying the usage of each gel coat and resin by the emission factor that is appropriate for the monomer content, method of application, and other emission reduction techniques for each gel coat and resin, and summing the emissions for all gel coats and resins. Emission factors shall be obtained from the reference approved by IDEM, OAM.
  - (B) Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA-approved form, emission factors shall be taken from the following reference approved by IDEM, OAM: "CFA Emission Models for the Reinforced Plastics Industries", Composites Fabricators Association, February 28, 1998, and shall not exceed 32.3% styrene emitted per weight of gel coat applied and 17.7% styrene emitted per weight of resin applied. For the purposes of these emission calculations, monomer in resins and gel coats that is not styrene shall be considered as styrene on an equivalent weight basis.

- (2) Resins and gel coats used, including filled resins and tooling resins and gel coats, shall be limited to maximum monomer contents of 35 percent (35%) by weight for resins, 37 percent (37%) by weight for gel coats or their equivalent on an emissions mass basis. Monomer contents shall be calculated on a neat basis, i.e., excluding any filler. Compliance with these monomer content limits shall be demonstrated on a monthly basis.

The use of resins with monomer contents lower than 35%, gel coats with monomer contents lower than 37%, and/or additional emission reduction techniques approved by IDEM, OAM, may be used to offset the use of resins with monomer contents higher than 35%, and/or gel coats with monomer contents higher than 37%. Examples of other techniques include, but are not limited to, lower monomer content resins and gel coats, closed molding, vapor suppression, vacuum bagging, controlled spraying, or installing a control device with an overall reduction efficiency of 95%. This is allowed to meet the monomer content limits for resins and gel coats, and shall be calculated on an equivalent emissions mass basis as shown below:

(Emissions from >35% resin or >37% gel coat) - (Emissions from 35% resin or 37% gel coat) # (Emissions from 35% resin or 37% gel coat) - (Emissions from <35% resin, <37% gel coat, and/or other emission reduction techniques).

Where: Emissions, lb or ton = M (mass of resin or gel coat used, lb or ton) \* EF (Monomer emission factor for resin or gel coat used, %);

EF, Monomer emission factor = emission factor, expressed as % styrene emitted per weight of resin applied, which is indicated by the monomer content, method of application, and other emission reduction techniques for each gel coat and resin used.

- (3) Flow coaters, a type of non-spray application technology of a design and specifications to be approved by IDEM, OAM, shall be used in the following manner:

- (A) To apply 50% of all neat resins within 6 months of issuance of this permit.
- (B) To apply 100% of all neat resins used within 1 year of issuance of this permit.

If after 1 year of operation it is not possible to apply a portion of neat resins with flow coaters, equivalent emissions reductions must be obtained via use of other techniques, elsewhere in the process.

- (4) Optimized spray techniques according to a manner approved by IDEM shall be used for gel coats and filled resins (where fillers are required for corrosion or fire retardant purposes) at all times. Optimized spray techniques include, but are not limited to, the use of airless, air-assisted airless, high volume low pressure (HVLP), or other spray applicators demonstrated to the satisfaction of IDEM, OAM, to be equivalent to the spray applicators listed above.

HVLP spray is the technology used to apply material to substrate by means of application equipment that operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

- (5) The listed work practices shall be followed:
- (A) To the extent possible, a non-VOC solvent shall be used for cleanup.
  - (B) Cleanup solvent containers used to transport solvent from drums to work stations shall be closed containers having soft gasketed spring-loaded closures.
  - (C) Cleanup rags saturated with solvent shall be stored, transported, and disposed of in containers that are closed tightly.
  - (D) The spray guns used shall be the type that can be cleaned without the need for spraying the solvent into the air.
  - (E) All solvent sprayed during cleanup or resin changes shall be directed into containers. Such containers shall be closed as soon as solvent spraying is complete and the waste solvent shall be disposed of in such a manner that evaporation is minimized.
  - (F) Storage containers used to store VOC-containing materials shall be kept covered when not in use.

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

The Plant 3 Northeast Painting Area and Plant 3 Southeast Painting Area each have a limited potential to emit less than ten (10) tons per year for any single Hazardous Air Pollutant (HAP) and less than twenty-five (25) tons per year for all Hazardous Air Pollutants (HAPs). Therefore, the requirements of 326 IAC 2-1-3.4 (New Source Toxics Control) will not be applicable.

### 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 Plant 1 Mold Prep Area, Plant 1 East Gel Area, Plant 1 West Gel Area, Plant 1 East Chop Area, Plant 1 West Chop Area, Plant 1 Final Finish Area, Plant 2 Pattern/Plug Making Area, Plant 2 Mold Making Gel Area, Plant 2 Mold Making Chop Area, Plant 3 Surface Prep Area, Plant 3 Northeast Painting Area and Plant 3 Southeast Painting Area have applicable compliance monitoring conditions as specified below:

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, daily observations shall be made of the overspray while one or more of the booths are in operation.
- (b) Weekly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary to indicate compliance with 326 IAC 6-3 (Process Operations) and the source PM emission limit under 326 IAC 2-2 (PSD).

- 2. The Plant 1 Grinding Area and Plant 2 Wood Insert Cutting Area have applicable compliance monitoring conditions as specified below:

- (a) Daily visible emissions notations of the Plant 1 Grinding Area and Plant 2 Wood Insert Cutting Area exhausts shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee will record whether emissions are normal or abnormal.

These monitoring conditions are necessary to indicate compliance with 326 IAC 6-3 (Process Operations) and the source PM emission limit under 326 IAC 2-2 (PSD).

### **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.

### **Conclusion**

The operation of this manufacturing plant for fiberglass components used in the automotive, recreational vehicle and van conversion industries shall be subject to the conditions of the attached proposed **Part 70 Permit No. T099-7078-00036**.

# Indiana Department of Environmental Management Office of Air Management

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

**Source Name:** Bremen Technologies, Inc., Plants 1, 2 and 3  
**Source Location:** 425 Industrial Drive (Plant 1), 1729 West Dewey (Plant 2), 1726 West Bike (Plant 3), Bremen, Indiana 46506  
**County:** Marshall  
**SIC Code:** 3711, 3713, 3714  
**Operation Permit No.:** T099-7078-00036  
**Permit Reviewer:** Catherine Moore

On October 21, 1998, the Office of Air Management (OAM) had a notice published in the Plymouth Pilot News, Bremen, Indiana, stating that Bremen Technologies, Inc., Plants 1, 2 and 3 had applied for a Part 70 Operating Permit to operate a fiberglass components manufacturing operation for the automotive, recreational vehicle and van conversion industries. The notice also stated that OAM proposed to issue a permit for this operation 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, OAM has made the following changes to the final Part 70 permit:

1. IDEM, OAM now believes that this condition is not necessary and has removed it from the final permit. The issues regarding credible evidence can be adequately addressed during a showing of compliance or noncompliance. Indiana's statutes, and the rules adopted under their authority, govern the admissibility of evidence in any proceeding. Indiana law contains no provisions that limit the use of any credible evidence and an explicit statement is not required in the permit. Condition B.28 "Credible Evidence" has been deleted from the final permit as follows:

~~B.28 Credible Evidence [326 IAC 2-7-5(3)] [62 Federal Register 8313] [326 IAC 2-7-6]~~

~~Notwithstanding the conditions of this permit that state specific methods that may be used to assess compliance or noncompliance with applicable requirements, other credible evidence may be used to demonstrate compliance or noncompliance.~~

2. Condition C.2 "Opacity" has been changed to be as follows:

~~C.2 Opacity [326 IAC 5-1]~~

~~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 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 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.

3. Condition D.1.8 "Monitoring" has been changed to be as follows:

**D.1.8 Monitoring**

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- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, ~~daily~~ **weekly** observations shall be made of the overspray from the Plant 1 East Gel Area, Plant 1 West Gel Area, Plant 1 East Chop Area, Plant 1 West Chop Area, Plant 2 Mold Making Gel Area, and Plant 2 Mold Making Chop Area stacks (P1-P4 and C2-C10) while one or more of the areas 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 stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for these 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.

4. Condition D.1.9(b) "Record Keeping Requirements" has been changed to be as follows:

- (b) To document compliance with Condition D.1.8, 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.

5. Condition D.2.8 "Monitoring" has been changed to be as follows:

**D.2.8 Monitoring**

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- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, ~~daily~~ **weekly** observations shall be made of the overspray from the Plant 1 Mold Prep Area, Plant 1 Final Finish Area, Plant 2 Pattern/Plug Making Area, Plant 3 Northeast Painting Area, and the Plant 3 Southeast Painting Area stacks (C2-C8, C11-C13, FF1-FF2, and P3X1-P3X4) 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 stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for these 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.

6. Condition D.2.9(b) "Record Keeping Requirements" has been changed to be as follows:
  - (b) To document compliance with Condition D.2.8, 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.

**Appendix A: Emissions Calculations**  
**Form DD: Reinforced Plastics and Composites - Chop Area**

**Company Name:** Bremen Motor Corp. - Plants 1,2 and 3  
**Address:** 425 Industrial Drive (Plant 1), 1729 West Dewey  
**City, IN Zip:** Bremen, Indiana 46506  
**T:** 099-7078  
**Pit ID:** 00036  
**Reviewer:** Catherine Moore  
**Date:** September 8, 1998

Material	Density (lb/gal)	Weight % Monomer	Gallons per unit	Units per hour	Pound VOC per hour	Pounds VOC per day	Tons of VOC per Year	PM tons per year	Emission Factor	Transfer Efficiency
R, RB-FS - Plant 1	9.21	5.4%	3.700000	10.90	2.63	63.01	11.50	384.61	13%	75%
R, RB-MS - Plant 1	9.21	5.4%	2.100000	1.90	0.26	6.23	1.14	38.05	13%	75%
R, SP - Plant 1	9.21	5.4%	0.500000	0.60	0.02	0.47	0.09	2.86	13%	75%
R, RB-FS - Plant 2	9.21	43.5%	3.700000	3.00	4.45	106.73	19.48	227.69	10%	10%
R, SP - Plant 2	9.21	43.5%	0.470000	0.80	0.15	3.62	0.66	7.71	10%	10%
R, RT - Plant 2	9.21	43.5%	1.440000	0.40	0.23	5.54	1.01	11.82	10%	10%
R, AD - Plant 2	9.21	43.5%	3.260000	0.10	0.13	3.13	0.57	6.69	10%	10%
R, MC - Plant 2	9.21	43.5%	0.820000	0.10	0.03	0.79	0.14	1.68	10%	10%
R, MP-L - Plant 2	9.21	43.5%	1.750000	0.30	0.21	5.05	0.92	10.77	10%	10%
R, MP-S - Plant 2	9.21	43.5%	0.910000	0.70	0.26	6.12	1.12	13.07	10%	10%
R, WT - Plant 2	9.21	43.5%	1.420000	0.10	0.06	1.37	0.25	2.91	10%	10%
R, TB - Plant 2	9.21	43.5%	147.100000	0.10	5.89	141.44	25.81	301.74	10%	10%
<b>Totals:</b>					11.69	280.49	51.19	624.99		

**METHODOLOGY**

Potential VOC Pounds per Hour = Density (lb/gal) \* Weight % Monomer \* Gal of Material (gal/unit) \* Maximum (unit/hr)  
 Potential VOC Pounds per Day = Density (lb/gal) \* Weight % Monomer \* Gal of Material (gal/unit) \* Maximum (unit/hr) \* (24 hrs / 1 day)  
 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)  
 Particulate Potential Tons per Year = (units/hour) \* (gal/unit) \* (lbs/gal) \* (1 - Weight % Volatiles) \* (1 - Transfer efficiency) \* (8760 hr/yr) \* (1 ton / 2000 lbs)  
 Pounds VOC per Gallon of Solids = (lbs/gal) \* (weight % organics) / (Volume % solids)  
 Total = Worst Coating + Sum of all solvents used  
 Emission Factor for Hand Layup of resin NVS is 0.1, VS is 0.07, for Spray Layup of resin NVS is 0.13, VS 0.09  
 Emission Factor for Hand and Spray Layup of gelcoat NVS is 0.35, VS is 0.25

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

**Company Name:** Bremen Motor Corp. - Plants 1,2 and 3  
**Address:** 425 Industrial Drive (Plant 1), 1729 West Dewey  
**City, IN Zip:** Bremen, Indiana 46506  
**T:** 099-7078  
**Plt ID:** 00036  
**Reviewer:** Catherine Moore  
**Date:** September 8, 1998

Material	Density (lb/gal)	Weight % Monomer	Gallons per unit	Units per hour	Pound VOC per hour	Pounds VOC per day	Tons of VOC per Year	PM tons per year	Emission Factor	Transfer Efficiency
GC-P, RB-FS - Plant 1	10.29	33.3%	0.500000	0.30	0.18	4.32	0.79	1.13	35%	75%
GC-C, RB-FS - Plant 1	10.58	32.7%	0.600000	1.80	1.31	31.39	5.73	8.42	35%	75%
GC-CL, RB-FS - Plant 1	9.19	46.1%	0.400000	8.80	5.22	125.27	22.86	19.09	35%	75%
GC-P, RB-MS - Plant 1	10.29	33.3%	0.300000	1.90	0.68	16.41	2.99	4.28	35%	75%
GC-P, SP - Plant 1	10.29	33.3%	0.100000	0.60	0.07	1.73	0.32	0.45	35%	75%
GC-P, RB-FS - Plant 2	10.29	33.3%	0.520000	0.10	0.06	1.50	0.27	0.39	35%	75%
GC-C, RB-FS - Plant 2	10.58	32.7%	0.630000	0.50	0.38	9.15	1.67	2.46	35%	75%
GC-CL, RB-FS - Plant 2	9.19	46.1%	0.450000	2.40	1.60	38.43	7.01	5.86	35%	75%
GC-P, SP - Plant 2	10.29	33.3%	0.120000	0.80	0.12	2.76	0.50	0.72	35%	75%
GC-P, RT - Plant 2	10.58	32.7%	0.460000	0.40	0.22	5.35	0.98	1.43	35%	75%
GC-C, AD - Plant 2	10.58	32.7%	1.050000	0.10	0.13	3.05	0.56	0.82	35%	75%
<b>Totals:</b>					9.97	239.35	43.68	45.05		

**METHODOLOGY**

Potential VOC Pounds per Hour = Density (lb/gal) \* Weight % Monomer \* Gal of Material (gal/unit) \* Maximum (unit/hr)  
 Potential VOC Pounds per Day = Density (lb/gal) \* Weight % Monomer \* Gal of Material (gal/unit) \* Maximum (unit/hr) \* (24 hrs / 1 day)  
 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)  
 Particulate Potential Tons per Year = (units/hour) \* (gal/unit) \* (lbs/gal) \* (1 - Weight % Volatiles) \* (1 - Transfer efficiency) \* (8760 hr/yr) \* (1 ton / 2000 lbs)  
 Pounds VOC per Gallon of Solids = (lbs/gal) \* (weight % organics) / (Volume % solids)  
 Total = Worst Coating + Sum of all solvents used  
 Emission Factor for Hand Layup of resin NVS is 0.1, VS is 0.07, for Spray Layup of resin NVS is 0.13, VS 0.09  
 Emission Factor for Hand and Spray Layup of gelcoat NVS is 0.35, VS is 0.25

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

**Company Name:** Bremen Motor Corp. - Plants 1,2 and 3  
**Address:** 425 Industrial Drive (Plant 1), 1729 West Dewey  
**City, IN Zip:** Bremen, Indiana 46506  
**T:** 099-7078  
**Pit ID:** 00036  
**Reviewer:** Catherine Moore  
**Date:** September 8, 1998

Material	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	lb VOC /gal solids	Transfer Efficiency
DuPont 30S - Plant 1	10.0	45.97%	0.0%	46.0%	0.0%	54.03%	0.10000	13.400	4.62	4.62	6.18	148.43	27.09	15.92	8.54	50%
DuPont 1140S - Plant 1	12.9	30.71%	0.0%	30.7%	0.0%	69.29%	0.10000	13.400	3.95	3.95	5.30	127.11	23.20	26.17	5.70	50%
DuPont 1130S - Plant 1	7.3	94.00%	0.0%	94.0%	0.0%	6.00%	0.10000	13.400	6.82	6.82	9.14	219.47	40.05	1.28	113.74	50%
DuPont 1125S - Plant 1	8.1	60.15%	0.0%	60.2%	0.0%	39.85%	0.10000	13.400	4.88	4.88	6.54	157.08	28.67	9.50	12.26	50%
S-0280 - Plant 1	8.9	100.00%	0.0%	100.0%	0.0%	0.00%	0.10000	13.400	8.86	8.86	11.87	284.94	52.00	0.00	ERR	50%
DuPont 30S - Plant 2	10.0	45.97%	0.0%	46.0%	0.0%	54.03%	0.10000	5.600	4.60	4.60	2.57	61.78	11.28	13.25	8.51	0%
DuPont 1140S - Plant 2	12.9	30.71%	0.0%	30.7%	0.0%	69.29%	0.10000	5.600	3.96	3.96	2.22	53.24	9.72	21.92	5.72	0%
DuPont 1130S - Plant 2	7.3	94.00%	0.0%	94.0%	0.0%	6.00%	0.10000	5.600	6.86	6.86	3.84	92.23	16.83	1.07	114.37	0%
DuPont 1125S - Plant 2	8.1	60.15%	0.0%	60.2%	0.0%	39.85%	0.10000	5.600	4.87	4.87	2.73	65.48	11.95	7.92	12.23	0%
S-280 - Plant 2	8.9	100.00%	0.0%	100.0%	0.0%	0.00%	0.24000	5.600	8.90	8.90	11.96	287.08	52.39	0.00	ERR	0%

**State Potential Emissions**

**Add worst case coating to all solvents**

**62.37**

**1496.84**

**273.17**

**97.03**

**METHODOLOGY**

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

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

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

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

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

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

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

Total = Worst Coating + Sum of all solvents used