PART 70 OPERATING PERMIT
OFFICE OF AIR QUALITY

Jason Industries Inc.
1500 West Lusher
Elkhart, Indiana 46517

(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 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.: T 039-7653-00104	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: July 17, 2001 Expiration Date: July 17, 2006

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in Conditions A.1 through A.4 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)] [326 IAC 2-7-1(22)]

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

Responsible Official:	Lon Franklin
Source Address:	1500 West Lusher, Elkhart, Indiana 46517
Mailing Address:	1500 West Lusher, Elkhart, Indiana 46517
General Source Phone Number:	219 - 294 - 7595
SIC Code:	3792
County Location:	Elkhart
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under PSD Rules; Major Source, Section 112 of the Clean Air Act

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

This fiberglass vehicle parts manufacturing and painting company consists of two (2) plants:

(a) Plant 1 is located at 1500 West Lusher, Elkhart, Indiana; and

(b) Plant 2 is located at 1500 West Lusher, Elkhart, Indiana; and

Since the two (2) plants are located on contiguous properties, belong to the same industrial grouping, and under common control of the same entity, they will be considered one (1) source, effective from the date of issuance of this Part 70 permit. This determination was made in CP 039-3693-00104, issued on September 9, 1994.

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

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

Plant 1

(a) One (1) gelcoat booth, known as EU1, equipped with air-assisted airless or airless spray applicators, equipped with dry filters for overspray control, equipped with a 12,800 cubic feet per minute exhaust fan, exhausting through Stack 1, capacity: 8.0 fiberglass parts per hour.

(b) One (1) resin chop booth, known as EU2, equipped with a chopper system and one (1) wet out gun for rail lamination, equipped with dry filters for overspray control, equipped with a 12,800 cubic feet per minute exhaust fan, exhausting through Stack 2, capacity: 7.0 fiberglass parts per hour.

(c) One (1) base coat spray booth, known as EU3, equipped with high volume low pressure (HVLP) spray applicators, equipped with dry filters for overspray control, equipped with a 5,000 cubic feet per minute exhaust fan, exhausting through Stack 3, capacity: 8.0 fiberglass parts per hour.

(d) Two (2) cutting, grinding and preparation areas, equipped with one (1) recirculating baghouse dust collector for particulate matter control, known as BH-1, exhausted through Stack 7 at 10,000 cubic feet per minute, capacity: 700 pounds of fiberglass per hour.

(e) One (1) clear coat spray booth, known as EU4, equipped with high volume low pressure (HVLP) spray applicators, equipped with dry filters for overspray control, equipped with a 11,000 cubic feet per minute exhaust fan, exhausting through Stack 4, capacity: 6.0 fiberglass parts per hour.

Plant 2

(f) One (1) gelcoat booth, known as EU5, equipped with air assisted airless or airless spray applicators, equipped with dry filters for overspray control, equipped with a 3,000 cubic feet per minute exhaust fan, exhausting through Stack 5, capacity: 6.0 fiberglass parts per hour.

(g) One (1) resin chop booth, known as EU6, equipped with a chopper system and ceramic/dualite bed coat spray system, equipped with dry filters for overspray control, equipped with a 5,000 cubic feet per minute exhaust fan, exhausting through Stack 6, capacity: 3.0 fiberglass parts per hour.

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

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

(a) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone. [326 IAC 6-3-2]

(b) Two (2) M-1/M-2 Grayson high shear resin mixers, Plants 1 and 2. [326 IAC 6-3-2]

(c) M-2 Grayson low speed resin suspension mixer, Plant 1. [326 IAC 6-3-2]

(d) Portable self contained dust collector in assembly area, Plant 2. [326 IAC 6-3-2]

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

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

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

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

SECTION B GENERAL CONDITIONS

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

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

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

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

B.3 Enforceability [326 IAC 2-7-7]

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

B.4 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.5 Severability [326 IAC 2-7-5(5)]

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

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

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

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

(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 Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

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

(b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality. [326 IAC 2-7-5(6)(E)]

(c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 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, except those specifically designated as not federally enforceable, 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.

(c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

B.9 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification 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, using the attached Certification Form, with each submittal requiring certification.

(c) A responsible official is defined at 326 IAC 2-7-1(34).

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

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
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, OAQ, on or before the date it is due.

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

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

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

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

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

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

B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) 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; and

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

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

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

The PMP and the PMP extension notification do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.

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

require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

B.12 Emergency Provisions [326 IAC 2-7-16]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.

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

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

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

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

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

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

Telephone Number: 219-245-4870 (Northern Regional Office)
Facsimile Number: 219-245-4877 (Northern Regional Office)

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

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
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). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) be revised in response to an emergency.

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

(g) 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.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

(a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at

the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

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

(b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. All previously issued operating permits are superseded by this permit.

(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, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

(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. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

(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, OAQ, 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, OAQ, has issued the modification. [326 IAC 2-7-12(b)(7)]

B.14 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 occur-

rence, shall constitute a single potential violation of this permit.

B.15 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 Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report.

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

(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) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.

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

Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

B.16 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)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

(c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-4]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
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, OAQ, on or before the date it is due.

(2) If IDEM, OAQ, 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, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, 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, OAQ, 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.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

(a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

(a) No Part 70 permit revision 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.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (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 preconstruction approval required by 326 IAC 2-7-10.5 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 Quality
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 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, OAQ, in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

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

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

(3) Any change in emissions; and

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

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require 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, OAQ, or U.S. EPA is required.

B.21 Source Modification Requirement [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by 326 IAC 2 and 326 IAC 2-7-10.5.

B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2]

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

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

(b) Have access to and copy any records that must be kept under the conditions of this permit;

(c) Inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) Sample or monitor 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.

B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

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

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

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

The application 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) 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.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

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

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

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

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 Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

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

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

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

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 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. 326 IAC 9-1-2 is not federally enforceable.

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)]

Except as otherwise provided by statute or rule, or in this permit, 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 applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4(d)(3), (e), and (f), and 326 IAC 1-7-5(d) are not federally enforceable.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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

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

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

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

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

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

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
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 applicable 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 applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) 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, pursuant to the provisions of 40 CFR 61, Subpart M, is federally enforceable.

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

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

(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 any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

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

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.10 Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
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).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

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

(a) In the event that a breakdown of the emission monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less often than once an hour until such time as the continuous monitor is back in operation.

(b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.13 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

C.14 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

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

(b) Whenever a condition in this permit requires the measurement of a temperature, flow rate, or pH level, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (±2%) of full scale reading.

(c) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

(a) A compliance schedule for meeting the requirements of 40 CFR 68; or

(b) As a part of the annual 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).

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

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

(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. The compliance monitoring plan can be either an entirely new document, consist in whole of information contained in other documents, or consist of a combination of new information and information contained in other documents. If the compliance monitoring plan incorporates by reference information contained in other documents, the Permittee shall identify as part of the compliance monitoring plan the documents in which the information is found. The elements of the compliance monitoring plan are:

(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 (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, OAQ upon request and shall be subject to review and approval by IDEM, OAQ. 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) Reasonable response steps that may 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 reasonable 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, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to take reasonable response steps may constitute a violation of the permit.

(c) Upon investigation of a compliance monitoring excursion, the Permittee is excused from taking further response steps for any of the following reasons:

(1) A false reading occurs due to the malfunction of the monitoring equipment. 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.

(3) An automatic measurement was taken when the process was not operating.

(4) The process has already returned or is returning 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.

(e) All monitoring required in Section D shall be performed at all times the equipment is operating. If monitoring is required by Section D and the equipment is not operating, then the Permittee may record the fact that the equipment is not operating or perform the required monitoring.

(f) At its discretion, IDEM may excuse the Permittee's failure to perform the monitoring and record keeping as required by Section D, if the Permittee provides adequate justification and documents that such failures do not exceed five percent (5%) of the operating time in any quarter. Temporary, unscheduled unavailability of qualified staff shall be considered a valid reason for failure to perform the monitoring or record keeping requirements in

Section D.

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

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

(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, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

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

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

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

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

(1) Indicate estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);

(2) Indicate estimated actual emissions of other regulated pollutants (as defined by 326 IAC 2-7-1) from the source, for purposes of Part 70 fee assessment.

(b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

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

(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, OAQ, on or before the date it is due.

C.20 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

(a) Records of all required data, reports 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. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.21 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

(a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(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 Quality
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, OAQ, on or before the date it is due.

(d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) 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. Reporting periods are based on calendar years.

Stratospheric Ozone Protection

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

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

(a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

(b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

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

Plant 1

(a) One (1) gelcoat booth, known as EU1, equipped with air-assisted airless or airless spray applicators, equipped with dry filters for overspray control, equipped with a 12,800 cubic feet per minute exhaust fan, exhausting through Stack 1, capacity: 8.0 fiberglass parts per hour.

(b) One (1) resin chop booth, known as EU2, equipped with a chopper system and one (1) wet out gun for rail lamination, equipped with dry filters for overspray control, equipped with a 12,800 cubic feet per minute exhaust fan, exhausting through Stack 2, capacity: 7.0 fiberglass parts per hour.

(c) One (1) base coat spray booth, known as EU3, equipped with high volume low pressure (HVLP) spray applicators, equipped with dry filters for overspray control, equipped with a 5,000 cubic feet per minute exhaust fan, exhausting through Stack 3, capacity: 8.0 fiberglass parts per hour.

(d) Two (2) cutting, grinding and preparation areas, equipped with one (1) recirculating baghouse dust collector for particulate matter control, known as BH-1, exhausted through Stack 7 at 10,000 cubic feet per minute, capacity: 700 pounds of fiberglass per hour.

(e) One (1) clear coat spray booth, known as EU4, equipped with high volume low pressure (HVLP) spray applicators, equipped with dry filters for overspray control, equipped with a 11,000 cubic feet per minute exhaust fan, exhausting through Stack 4, capacity: 6.0 fiberglass parts per hour.

Plant 2

(f) One (1) gelcoat booth, known as EU5, equipped with air assisted airless spray applicators, equipped with dry filters for overspray control, equipped with a 3,000 cubic feet per minute exhaust fan, exhausting through Stack 5, capacity: 6.0 fiberglass parts per hour.

(g) One (1) resin chop booth, known as EU6, equipped with a chopper system, equipped with dry filters for overspray control, equipped with a 5,000 cubic feet per minute exhaust fan, exhausting through Stack 6, capacity: 3.0 fiberglass parts per hour.

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

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

D.1.1 BACT [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6 (New facilities: general reduction requirements), BACT for Plant 1, comprised of EU1, EU2, EU3 and EU4 and Plant 2 comprised of EU5 and EU6, is the following:

(a) The use of the as-installed HVLP spray applicators for Plants 1 and 2,

(b) The potential to emit volatile organic compounds shall be limited such that the volatile organic compounds emissions:

(1) From the use of resins and gel coats in EU1 and EU2 shall be less than 94.8 tons per consecutive twelve (12) month period, and

(2) From the use of resins and gel coats in EU5 and EU6 shall be less than 90.1 tons per consecutive twelve (12) month period.

(3) Compliance with these limits shall be determined based upon the following criteria:

(A) 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, OAQ.

(B) The emission factors approved for use by IDEM, OAQ shall be taken from the following reference: "Unified Emission Factors for Open Molding of Composites," Composites Fabricators Association, April 1999, with the exception of the emission factors for controlled spray application. For HAP-emitting operations not addressed by this reference, emission factors shall be taken from U.S. EPA's AP-42 document. For the purposes of these emission calculations, HAP monomer in resins and gel coats that is not styrene or methyl methacrylate shall be considered as styrene on an equivalent weight basis.

(c) The potential to emit volatile organic compounds shall be limited such that the volatile organic compounds delivered to the applicators from the use of paints and solvents in EU3 and EU4 shall be less than 68.7 tons per consecutive twelve (12) month period.

(d) The HAP monomer content of resins and gel coats used shall be limited to the following or their equivalent on an emissions mass basis:

Type of Gel Coat or Resin	**HAP Monomer Content** % by weight
Production[1] Gel Coat	37
Tooling[2] Gel Coat	38
Production Filled Resin[3]	38
Tooling Resin	43

[1] Production refers to the manufacture of parts.

[2] Tooling refers to the manufacture of the molds from which parts are manufactured.

[3] Filled resin means a resin containing inert filler material equal to or greater than thirty-five percent (35%) by weight pursuant to 326 IAC 20-25-2(12).

HAP monomer contents shall be calculated on an unfilled basis, which means excluding any filler. Compliance with these HAP monomer content limits shall be demonstrated on a monthly basis.

Gel coats or resins with HAP monomer contents lower than those specified in the table in this subsection or additional emission reduction techniques approved by IDEM, OAQ may be used to offset the use of gel coats or resins with HAP monomer contents higher than those specified in the table in this subsection. This is allowed to meet the HAP monomer

content limits for resins and gel coats and shall be calculated on an equivalent emissions mass basis as shown below:

(Emissions from higher than compliant HAP monomer content resin or gel coat) - (Emissions from compliant resin or gel coat) # (Emissions from compliant resin or gel coat) - (Emissions from lower than compliant resin or gel coat and/or using other emission reduction techniques).

Where: Emissions, lb or ton = M (Mass of resin or gel coat used, lb or ton) * EF (HAP monomer emission factor for resin or gel coat used);

EF, HAP monomer emission factor = emission factor, expressed as pounds (lbs) VOC or HAP emitted per ton of resin/gel coat processed, which is indicated by the HAP monomer content, method of application, and other emission reduction techniques for each resin and gel coat used.

(e) Non-atomized spray application technology shall be used to apply unfilled production resins. Non-atomized spray application technology includes flow coaters, flow choppers, pressure-fed rollers, or other non-spray applications of a design and specifications approved by IDEM, OAQ.

If it is not possible to apply a portion of unfilled resins with non-atomized spray application technology, equivalent emissions reductions must be obtained via use of other emission reduction techniques. Examples of other emission reduction techniques include, but are not limited to, lower HAP monomer content resins and gel coats, closed molding, vapor suppression, vacuum bagging/bonding, or installing a control device.

(f) Optimized spray techniques according to a manner approved by IDEM, OAQ shall be used for the application of all gel coats and filled resins (where fillers are required for corrosion or fire retardant purposes) at all gel coat booth production operations. A filled resin means a resin containing inert filler material equal to or greater than thirty-five percent by weight pursuant to 326 IAC 20-25-2(12). Pursuant to 326 IAC 20-25-2(16) an inert filler means any non-HAP material, such as silica micro-spheres or micro-balloons, added to a resin or gel coat to alter density of the resin or gelcoat or change other physical properties of the resin or gel coat. This term does not include pigments. 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.

(g) The listed work practices shall be followed in Plants 1 and 2:

(1) To the extent possible, non-VOC, non-HAP solvent shall be used for cleanup.

(2) For VOC and/or HAP containing materials:

(A) Cleanup solvent containers shall be used to transport solvent from drums to work.

(B) Cleanup stations shall be closed containers having soft gasketed spring-loaded closures and shall be kept completely closed when not in use.

(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 shall be kept covered when not in use.

(h) CP 039-3693-00104 issued on September 9, 1994

Operation Condition #4, limiting VOC emissions from Plant 2 to 24.0 tons per rolling 12-month period. The following flash-off emission factors shall apply for the facilities materials and operations: polyester resin - 11%, polyester gelcoat - 30.5%, and flush - 100%.

Reason not incorporated: The limit was written to render the requirements of 326 IAC 8-1-6 not applicable. The BACT determination for the Plant 2 fiberglass operations satisfies 326 IAC 8-1-6. Therefore, this twenty four (24) ton per year limit has been replaced by the 90.1 tons per twelve (12) consecutive month period limit coupled with the BACT conditions. The emission factors have also been replaced by the emission factors cited in (b)(3)(B) of this condition.

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

The PM from the six (6) spray booths (EU1 through EU6) shall not exceed the pound per hour emission rate established as E in either of the appropriate following formulas:

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

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

or

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

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

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

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

Compliance Determination Requirements

D.1.4 Volatile Organic Compounds (VOC)

Compliance with the VOC/HAP 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 coating manufacturer.

D.1.5 VOC Emissions

Compliance with Condition D.1.1 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the twelve (12) month period.

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

D.1.6 Particulate Matter (PM)

The dry filters for PM control shall be in operation and control emissions from the six (6) spray booths, EU1 through EU6, at all times when any of the six (6) spray booths are in operation.

D.1.7 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 six (6) spray booth Stacks 1, 2, 3, 4, 5, and 6 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)] [326 IAC 2-7-19]

D.1.8 Record Keeping Requirements

(a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and VOC/HAP monomer content limits established in Condition D.1.1.

(1) The amount, VOC content and VOC/HAP monomer content of each resin, gelcoat, coating, 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 HAP monomer content for resins and gelcoats calculated on an equivalent mass basis for each month in which noncompliant resins or gelcoats are used.

(4) The VOC and HAP containing cleanup solvent usage for each month;

(5) The total VOC and volatile organic HAP usage for each month; and

(6) The weight of VOCs and volatile organic HAPs emitted for each compliance period.

(b) To document compliance with Condition D.1.6 and D.1.7, 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.1.9 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 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. The report submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

SECTION D.2 FACILITY OPERATION CONDITIONS

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

(d) One (1) cutting, grinding and preparation area, equipped with one (1) recirculating baghouse dust collector for particulate matter control, known as BH-1, exhausted through Stack 7 at 10,000 cubic feet per minute, capacity: 700 pounds of fiberglass per hour.

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

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

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

Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from the cutting, grinding and preparation area shall not exceed 2.03 pounds per hour when operating at a process weight rate of 700 pounds per hour.

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

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

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

Compliance Determination Requirements

D.2.2 Particulate Matter (PM)

The baghouse for PM control shall be in operation and control emissions from the cutting, grinding and preparation area at all times that the cutting, grinding and preparation are in operation.

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

D.2.3 Visible Emissions Notations

(a) Visible emission notations of the baghouse stack exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

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

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

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

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. 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.

D.2.4 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the cutting, grinding and preparation area processes, at least once per shift when these processes are in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 1.0 and 3.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading. 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.

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

D.2.5 Baghouse Inspections

An inspection shall be performed each calender quarter of all bags controlling the cutting, grinding and preparation area operations when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

D.2.6 Broken or Failed Bag Detection

In the event that bag failure has been observed:

(a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. 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) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

D.2.7 Record Keeping Requirements

(a) To document compliance with Condition D.2.3, the Permittee shall maintain records of visible emission notations of the baghouse stack exhaust once per shift.

(b) To document compliance with Condition D.2.4, the Permittee shall maintain the following:

(1) Records of the following operational parameters during normal operation when venting to the atmosphere once per shift:

(A) Inlet and outlet differential static pressure; and

(B) Cleaning cycle operation.

(2) Documentation of the dates vents are redirected.

(c) To document compliance with Condition D.2.5, the Permittee shall maintain records of the results of the inspections required under Condition D.2.5 and the dates the vents are redirected.

(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.3 FACILITY OPERATION CONDITIONS

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

(a) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone. [326 IAC 6-3-2]

(b) Two (2) M-1/M-2 Grayson high shear resin mixers, Plants 1 and 2. [326 IAC 6-3-2]

(c) M-2 Grayson low speed resin suspension mixer, Plant 1. [326 IAC 6-3-2]

(d) Portable self contained dust collector in the assembly area, Plant 2. [326 IAC 6-3-2]

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

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

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

Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from the trimmers, mixers and the portable self contained dust collector in the assembly area shall not exceed the allowable PM emission rate based on the following equation:

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

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

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

PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Jason Industries Inc.
Source Address: 1500 West Lusher, Elkhart, Indiana 46517
Mailing Address: 1500 West Lusher, Elkhart, Indiana 46517
Part 70 Permit No.: T 039-7653-00104

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 Affidavit (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:
Phone:
Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH

100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT

Source Name: Jason Industries Inc.
Source Address: 1500 West Lusher, Elkhart, Indiana 46517
Mailing Address: 1500 West Lusher, Elkhart, Indiana 46517
Part 70 Permit No.: T 039-7653-00104

This form consists of 2 pages **Page 1 of 2**

9 This is an emergency as defined in 326 IAC 2-7-1(12)
- C The Permittee must notify the Office of Air Quality (OAQ), 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.

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

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

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

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

Part 70 Quarterly Report

Source Name: Jason Industries Inc.
Source Address: 1500 West Lusher, Elkhart, Indiana 46517
Mailing Address: 1500 West Lusher, Elkhart, Indiana 46517
Part 70 Permit No.: T 039-7653-00104
Facilities: Plant 1, EU1 and EU2
Parameter: VOC usage
Limit: 94.8 per twelve (12) consecutive month period

YEAR: _____

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

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: _____

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

Source Name: Jason Industries Inc.
Source Address: 1500 West Lusher, Elkhart, Indiana 46517
Mailing Address: 1500 West Lusher, Elkhart, Indiana 46517
Part 70 Permit No.: T 039-7653-00104
Facilities: Plant 1, EU3 and EU4
Parameter: VOC usage
Limit: 68.7 per twelve (12) consecutive month period

YEAR: _____

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

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: _____

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

Source Name: Jason Industries Inc.
Source Address: 1500 West Lusher, Elkhart, Indiana 46517
Mailing Address: 1500 West Lusher, Elkhart, Indiana 46517
Part 70 Permit No.: T 039-7653-00104
Facilities: Plant 2, EU5 and EU6
Parameter: VOC usage
Limit: 90.1 per twelve (12) consecutive month period

YEAR: _____

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

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: _____

Attach a signed certification to complete this report.

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

PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Jason Industries Inc.
Source Address: 1500 West Lusher, Elkhart, Indiana 46517
Mailing Address: 1500 West Lusher, Elkhart, Indiana 46517
Part 70 Permit No.: T 039-7653-00104

Months: _____ to _____ Year: _____

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".
9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.
9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

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

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

Page 2 of 2

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

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: ____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Part 70 Operating Permit

Source Background and Description

Source Name:	**Jason Industries Inc.**
Source Location:	**1500 West Lusher, Elkhart, Indiana 46517**
County:	**Elkhart**
SIC Code:	**3792**
Operation Permit No.:	**T 039-7653-00104**
Permit Reviewer:	**Frank P. Castelli**

The Office of Air Quality (OAQ) has reviewed a Part 70 permit application from Jason Industries Inc. relating to the operation of a fiberglass vehicle parts manufacturing and painting source.

This source consists of two (2) plants. Plant 1 was issued Operation Permit 039-00104 on May 16, 1991 for Emission Units (EU1, 2 and 3). This permit did not contain a limit on VOC emissions. The addition of the one (1) clear coat spray booth, known as EU4 in January 1992 did not increase emissions from this plant since EU4 caused a reduction in production at EU3 and did not change any processes or materials.

The current potential VOC emissions for Plant 1 are greater than two hundred and fifty (250) tons per year as shown on page 1 of 3 of Appendix A. Therefore, the VOC emissions from Plant 1 will be limited to less than two hundred and fifty (250) tons per year and subject to the requirements of 326 IAC 8-1-6. The total actual VOC emissions from Plant 1 never exceeded two hundred and fifty (250) tons per year.

Plant 2 was issued Construction Permit CP 039-3693 on September 9, 1994. This permit contained a twenty-four (24.0) ton per year VOC emission limit to render the requirements of 326 IAC 8-1-6 not applicable. Jason Industries requested that this limit be eliminated and thus be subject to the requirements of 326 IAC 8-1-6. The VOC emissions from Plant 2 will be limited to the potential to emit, which is less than one hundred (100) tons per year and is considered a minor PSD modification due to the relaxation of the existing limit to render the requirements of 326 IAC 8-1-6 not applicable by the acceptance of presumptive BACT conditions.

Source Definition

This fiberglass vehicle parts manufacturing company consists of two (2) plants:

(1) Plant 1 is located at 1500 West Lusher, Elkhart, Indiana; and

(2) Plant 2 is located at 1500 West Lusher, Elkhart, Indiana.

Since these two (2) 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:

Plant 1

(a) One (1) gelcoat booth, known as EU1, equipped with air-assisted airless spray applicators, equipped with dry filters for overspray control, equipped with a 12,800 cubic feet per minute exhaust fan, exhausting through Stack 1, capacity: 8.0 fiberglass parts per hour.

(b) One (1) resin chop booth, known as EU2, equipped with a chopper system, equipped with dry filters for overspray control, equipped with a 12,800 cubic feet per minute exhaust fan, exhausting through Stack 2, capacity: 7.0 fiberglass parts per hour.

(c) One (1) base coat spray booth, known as EU3, equipped with high volume low pressure (HVLP) spray applicators, equipped with dry filters for overspray control, equipped with a 5,000 cubic feet per minute exhaust fan, exhausting through Stack 3, capacity: 8.0 fiberglass parts per hour.

(d) One (1) cutting, grinding and preparation area, equipped with one (1) recirculating baghouse dust collector for particulate matter control, known as BH-1, exhausted through Stack 7 at 10,000 cubic feet per minute, capacity: 700 pounds of fiberglass per hour.

Plant 2

(e) One (1) gelcoat booth, known as EU5, equipped with air assisted airless spray applicators, equipped with dry filters for overspray control, equipped with a 3,000 cubic feet per minute exhaust fan, exhausting through Stack 5, capacity: 6.0 fiberglass parts per hour.

(f) One (1) resin chop booth, known as EU6, equipped with a chopper system, equipped with dry filters for overspray control, equipped with a 5,000 cubic feet per minute exhaust fan, exhausting through Stack 6, capacity: 3.0 fiberglass parts per hour.

Unpermitted Emission Units and Pollution Control Equipment

Plant 1

(g) One (1) clear coat spray booth, known as EU4, equipped with high volume low pressure (HVLP) spray applicators, equipped with dry filters for overspray control, equipped with a 11,000 cubic feet per minute exhaust fan, exhausting through Stack 4, capacity: 6.0 fiberglass parts per hour.

New Emission Units and Pollution Control Equipment Receiving Advanced Source Modification Approval

The application includes information relating to the prior approval for the construction and operation of the following equipment pursuant to 326 IAC 2-7-5(16):

There are no new facilities proposed at this source during this review process.

Insignificant Activities

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

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

(b) The following VOC and HAP storage containers: storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons; vessels storing lubricating oil, hydraulic oils, machining oils, and machining fluids.

(c) Cleaners and solvents characterized as follows: having a vapor pressure equal to or less than 2 kiloPascals; 15 millimeters of mercury; or 0.3 pounds per square inch measured at 38EC (100EF) or; having a vapor pressure equal to or less than 0.7 kiloPascals; 5 millimeters of mercury; or 0.1 pounds per square inch measured at 20EC (68EF); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.

(d) Solvent recycling systems with batch capacity less than or equal to 100 gallons.

(e) Any operation using aqueous solutions containing less than 1 percent by weight of VOCs excluding HAPs.

(f) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone.

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

(h) P-1 Paint touch up and repair, emissions less than 1 pound per day.

(i) EU 4 cure oven recirculates 90% of air drawing 10% fresh air through vent and exhausted through stack 4 under clear coat booth operations.

(j) Two (2) M-1/M-2 Grayson high shear resin mixers, Plants 1 and 2.

(k) M-2 Grayson low speed resin suspension mixer, Plant 1.

(l) W-12 various paste wax, glazers, mold agents on a very limited quantity.

(m) One (1) above ground resin storage tank, known as BT-1, capacity: 5,000 gallons.

(n) Water jet cutter, Plant 1

(o) Portable self contained dust collector in assembly area, Plant 2.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

(a) Registration, issued on August 23, 1984,

(b) OP 039-00104, issued on May 16, 1991, and

(c) CP 039-3693-00104, issued on September 9, 1994.

All conditions from previous approvals were incorporated into this Part 70 permit except the following:

CP 039-3693-00104 issued on September 9, 1994

Operation Condition #4, limiting VOC emissions from Plant 2 to 24.0 tons per rolling 12-month period. The following flash-off emission factors shall apply for the facilities materials and operations: polyester resin - 11%, polyester gelcoat - 30.5%, and flush - 100%.

Reason not incorporated: Limit was written to render the requirements of 326 IAC 8-1-6 not applicable. A presumptive BACT with CFA emission factors is proposed for the Plant 2 fiberglass operations which satisfies 326 IAC 8-1-6. Therefore, this limit is no longer necessary and has been removed as requested by the applicant.

Enforcement Issue

(a) IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled *Unpermitted Emission Units and Pollution Control Equipment*.

(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 December 13, 1996. Additional information was received on August 27, 1997, April 23, 1998 and January 23, 2001.

A Notice of Completeness letter was mailed to the source on January 21, 1997.

Emission Calculations

See pages 1 through 3 of Appendix A of this document for detailed emissions calculations.

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.”

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	638
PM_{10}	638
SO_2	0.500
VOC	449
CO	2.00
NO_X	3.00

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

HAPs	Potential To Emit (tons/year)
Styrene	298
Toluene	18.4
MEK	5.90
MIBK	5.90
Xylene	66.8
Ethyl benzene	17.3
TOTAL	412

(a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of VOC and PM_{10} are equal to or greater than one hundred (100) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) 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 twenty-eight (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 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 1998 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	0.596
PM_{10}	Not Reported
SO_2	Not Reported
VOC	46.6
CO	Not Reported
NO_X	Not Reported
Ethyl benzene	0.64
Styrene	25.2
Toluene	10.7
Xylene	6.7

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 Operating Permit.

	Limited Potential to Emit (tons/year)						
Process/facility	**PM**	**PM_{10}**	**SO_2**	**VOC**	**CO**	**NO_X**	**HAPs**
Plant 1 Surface Coating Booths (EU1, 2, 3 & 4)	17.4	17.4	0.00	<163.5	0.00	0.00	228
Plant 2 Surface Coating booths (EU 5 & 6)	6.50	6.50	0.00	90.1	0.00	0.00	90.1
Grinding & Cutting Operations (BH-1)	1.50	1.50	0.00	0.00	0.00	0.00	0.00
Insignificant Activities	10.0	10.0	0.5	5.0	2.0	3.0	5.0
Total Emissions	35.4	35.4	0.500	<259	2.00	3.0	323

The VOC emissions from Plant 1 have been limited to less than 163.5 tons per year pursuant to 326 IAC 8-1-6. The potential to emit VOC from Plant 2 is 90.1 tons per year with the presumptive BACT conditions and the CFA emission factors.

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM_{10}	attainment
SO_2	attainment
NO_2	attainment
Ozone	maintenance
CO	attainment
Lead	attainment

(a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_X) are precursors for the formation of ozone. Therefore, VOC and NO_X emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_X emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

(b) Elkhart County has been classified as attainment or unclassifiable for all remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

Part 70 Permit Conditions

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

(a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.

(b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

(a) The federal Compliance Assurance Monitoring rule, 40 CFR 64, applies to Title V permit applications received or determined to be complete after April 20, 1998. Since the Part 70 application was received December 13, 1996, the requirements of 40 CFR Part 64, Compliance Assurance Monitoring, are not applicable to this source.

(b) The one (1) 5,000 gallon storage tank, known as BT-1, deemed an insignificant activity, is not subject to the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60.110b, Subpart Kb) since the capacity of the tank is less than 40 cubic meters (10,567 gallons).

(c) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14 and 40 CFR Part 63) applicable to this source.

State Rule Applicability - Entire Source

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

The total VOC usage at Plant 1, identified as EU1, EU2, EU3 and EU4 shall be limited such that the total VOC emissions are less 163.5 tons per consecutive twelve (12) month period pursuant to 326 IAC 8-1-6 , which is less than two hundred and fifty (250) tons per year. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) are not applicable.

Since the VOC emissions from Plant 1 are limited to less than two hundred and fifty (250) tons per year, the addition of Plant 2 in 1994 is considered a minor modification to an existing minor PSD source. The addition of Plant 2 made this source an existing major source under PSD which did not undergo PSD review. The total PTE of VOC from this source now exceeds two hundred fifty (250) tons per year. Future modifications to this major PSD source will be subject to the PSD significant levels and VOC emissions will have to be limited to less than forty (40) tons per year to represent a minor modification. Future modifications that have potential VOC emissions greater than forty (40) tons per year and that are not limited to less than forty (40) tons per year will be considered major modifications to an existing major source and thus be subject to PSD review.

The use of the baghouse and dry filters for PM control of the cutting, grinding and preparation area as well as the six (6) spray booths makes the requirements of 326 IAC 2-2 not applicable.

326 IAC 2-4.1-1 (New source toxics control)

This source was constructed prior to July 27, 1997. Therefore, the requirements of 326 IAC 2-4.1-1 do not apply.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than ten (10) tons per year of VOC in Elkhart County. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8) (Emission Statement Operating Year).

326 IAC 5-1 (Opacity Emissions Limitations)

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

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

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR Part 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.

State Rule Applicability - Individual Facilities

326 IAC 6-3-2 (Process Operations)

(a) Spray Booths

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) overspray from the six (6) spray booths shall be limited by the following:

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

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

or

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

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

The dry filters shall be in operation at all times any of the spray booths are in operation, in order to comply with this limit. The use of the dry filters satisfies 326 IAC 6-3-2 and also makes the requirements of 326 IAC 2-2 not applicable.

(b) Cutting, Grinding and Preparation Area

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the cutting, grinding and preparing operations shall not exceed 2.03 pounds per hour when operating at a process weight rate of 700 pounds per hour (0.35 tons per hour). As shown on page 3 of Appendix A, the controlled PM emission rate from these operations is 0.343 pounds per hour and thus the operation is in compliance with the rule. Any fugitive PM emissions from the cutting, grinding and preparation operations shall also be included in the emission limitation subject to the allowable PM limit of 2.03 pounds per hour. The use of the baghouse satisfies 326 IAC 6-3-2 and also makes the requirements of 326 IAC 2-2 not applicable.

326 IAC 8-1-6 (New facilities: general reduction requirements)

Plant 1

EU1, EU2 and EU3 in Plant 1 were constructed during January 1988. EU4, also in Plant 1, was constructed during January 1992. The total potential VOC emissions from these four (4) emission units is greater than twenty-five (25) tons per year. Operation Permit 039-00104, issued on May 16, 1991 for EU1, EU2 and EU3 did not address the requirements of 326 IAC 8-1-6.

A top-down BACT analysis from Jason Industries Inc. was received on January 23, 2001 and evaluated four (4) options: catalytic incineration, thermal incineration, rotary concentrator without incineration and the use of the as-installed HVLP spray applicators combined with workplace standards and the compliance with Federal MACT for the composite industry.

Research has shown that the catalytic incineration, thermal incineration and rotary concentrator add-on controls are technical feasible. However, since the concentration of VOC in the air stream is dilute because of the high flow rates required to comply with the OSHA PPE/PEL employee exposure limits, it makes the control technology less cost efficient.

In addition, the capital costs and annual operating costs required for the add on controls are not economically feasible for Jason Industries. Based on varying levels of efficiency and heat reclamation, costs for thermal incineration can be estimated from initial construction expenditures of $497,556 with total annual costs of $7,514,287 to initial construction costs of $2,583,266 and total annual costs of $1,036,452 depending upon the percentage of heat recovery. Since thermal incineration requires the use of natural gas and given the current trends in the cost of natural gas, operating costs would be higher than anticipated with current quoted fuel costs. New regulations require the use of lower styrene monomer content in raw materials further reducing the heat content value of the air stream. Thus this reduction requires even more supplemental fuel to effectively incinerate VOC. Similar conclusions were reached about the use of catalytic incineration.

Although the costs of the rotary concentrator of $1,407 per ton of VOC removed appears to be economically feasible, this add-on control normally requires the addition of thermal incineration to destroy the concentration VOC in the air stream. This $1,407 per ton of VOC removed does not include the significant added expense of purchasing and operating the incinerator. Thus, the combination of the thermal incinerator and rotary concentrator make the capital expenditure and operating costs economically infeasible compared to gross sales projected at eleven million for 2001.

BACT for Plant 1, comprised of EU1, EU2, EU3 and EU4, was determined to be

(a) The use of the as-installed HVLP spray applicators,

(b) The potential to emit volatile organic compounds shall be limited such that the volatile organic compounds emissions:

(1) From use of resins and gel coats in EU1 and EU2 shall be less than 94.8 tons per consecutive twelve (12) month period as calculated by the following:

(A) 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, OAQ.

(B) The emission factors approved for use by IDEM, OAQ shall be taken from the following reference: “Unified Emission Factors for Open Molding of Composites,” Composites Fabricators Association, April 1999, with the exception of the emission factors for controlled spray application. For HAP-emitting operations not addressed by this reference, emission factors shall be taken from U.S. EPA’s AP-42 document. For the purposes of these emission calculations, HAP monomer in resins and gel coats that is not styrene or methyl methacrylate shall be considered as styrene on an equivalent weight basis.

(c) The potential to emit volatile organic compounds shall be limited such that the volatile organic compounds delivered to the applicators from the use of paints and solvents in EU3 and EU4 shall be less than 68.7 tons per consecutive twelve (12) month period.

(d) The HAP monomer content of resins and gel coats used shall be limited to the following or their equivalent on an emissions mass basis:

Type of Gel Coat or Resin	**HAP Monomer Content** % by weight
Production[1] Gel Coat	37
Tooling[2] Gel Coat	38
Production Resin	35
Tooling Resin	43

[1] Production refers to the manufacture of parts.

[2] Tooling refers to the manufacture of the molds from which parts are manufactured.

HAP monomer contents shall be calculated on a neat basis, which means excluding any filler. Compliance with these HAP monomer content limits shall be demonstrated on a monthly basis.

Gel coats or resins with HAP monomer contents lower than those specified in the table in this subsection or additional emission reduction techniques approved by IDEM, OAQ may be used to offset the use of gel coats or resins with HAP monomer contents higher than those specified in the table in this subsection. This is allowed to meet the HAP monomer content limits for resins and gel coats and shall be calculated on an equivalent emissions mass basis as shown below:

(Emissions from higher than compliant HAP monomer content resin or gel coat) - (Emissions from compliant resin or gel coat) # (Emissions from compliant resin or gel coat) - (Emissions from lower than compliant resin or gel coat and/or using other emission reduction techniques).

Where: Emissions, lb or ton = M (Mass of resin or gel coat used, lb or ton) * EF (HAP monomer emission factor for resin or gel coat used);

EF, HAP monomer emission factor = emission factor, expressed as pounds (lbs) VOC or HAP emitted per ton of resin/gel coat processed, which is indicated by the HAP monomer content, method of application, and other emission reduction techniques for each resin and gel coat used.

(e) Non-atomized spray application technology shall be used to apply unfilled production resins. Non-atomized spray application technology includes flow coaters, flow choppers, pressure-fed rollers, or other non-spray applications of a design and specifications approved by IDEM, OAQ.

If it is not possible to apply a portion of unfilled resins with non-atomized spray application technology, equivalent emissions reductions must be obtained via use of other emission reduction techniques. Examples of other emission reduction techniques include, but are not limited to, lower HAP monomer content resins and gel coats, closed molding, vapor suppression, vacuum bagging/bonding, or installing a control device.

(f) Optimized spray techniques according to a manner approved by IDEM, OAQ shall be used for the application of all gel coats and filled resins (where fillers are required for corrosion or fire retardant purposes) at all gel coat booth production operations. 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, OAQ, 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.

(g) The listed work practices shall be followed:

(1) To the extent possible, non-VOC, non-HAP solvent shall be used for cleanup.

(2) For VOC and/or HAP containing materials:

(A) Cleanup solvent containers shall be used to transport solvent from drums to work.

(B) Cleanup stations shall be closed containers having soft gasketed spring-loaded closures and shall be kept completely closed when not in use.

(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 shall be kept covered when not in use.

Plant 2

Pursuant to CP 039-3693, issued on September 9, 1994, VOC emissions from EU5 and EU6 in Plant 2 were previously limited to twenty-four (24.0) tons per year, including emissions from clean-up solvents in order to avoid the requirements of this rule. This limit is being eliminated in this proposed permit. Therefore, Plant 2 is subject to the requirements of this rule. Since the potential-to-emit VOC from Plant 2 are less than one hundred (100) tons per year, the source has accepted the presumptive BACT conditions.

The BACT for the fiberglass reinforced plastic parts manufacturing operations in Plant 2, identified as EU5 and EU6, has been presumptively determined to be the following:

(a) The use of gel coats and resins shall be limited such that the potential to emit volatile organic compounds from use of such resins and gel coats and solvents shall not exceed 90.1 tons per consecutive twelve (12) month period. Compliance with this limit shall be determined based upon the following criteria:

(1) Monthly usage by weight, monomer content that is VOC, 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, OAQ.

(2) The emission factors approved for use by IDEM, OAQ shall be taken from the following reference: "Unified Emission Factors for Open Molding of Composites," Composites Fabricators Association, April 1999, with the exception of the emission factors for controlled spray application. This reference is included with this permit. For HAP-emitting operations not addressed by this reference, emission factors shall be taken from U.S. EPA's AP-42 document. For the purposes of these emission calculations, HAP monomer in resins and gel coats that is not styrene or methyl methacrylate shall be considered as styrene on an equivalent weight basis.

(b) The HAP monomer content of resins and gel coats used shall be limited to the following or their equivalent on an emissions mass basis:

Type of Gel Coat or Resin	**HAP Monomer Content** % by weight
Production[1] Gel Coat	37
Tooling[2] Gel Coat	38
Production Resin	35
Tooling Resin	43

[1] Production refers to the manufacture of parts.

[2] Tooling refers to the manufacture of the molds from which parts are manufactured.

HAP monomer contents shall be calculated on a neat basis, which means excluding any filler. Compliance with these HAP monomer content limits shall be demonstrated on a monthly basis.

Gel coats or resins with HAP monomer contents lower than those specified in the table in this subsection or additional emission reduction techniques approved by IDEM, OAQ may be used to offset the use of gel coats or resins with HAP monomer contents higher than those specified in the table in this subsection. This is allowed to meet the HAP monomer content limits for resins and gel coats and shall be calculated on an equivalent emissions mass basis as shown below:

(Emissions from higher than compliant HAP monomer content resin or gel coat) - (Emissions from compliant resin or gel coat) # (Emissions from compliant resin or gel coat) - (Emissions from lower than compliant resin or gel coat and/or using other emission reduction techniques).

Where: Emissions, lb or ton = M (Mass of resin or gel coat used, lb or ton) * EF (HAP monomer emission factor for resin or gel coat used);

EF, HAP monomer emission factor = emission factor, expressed as pounds (lbs) VOC or HAP emitted per ton of resin/gel coat processed, which is indicated by the HAP monomer content, method of application, and other emission reduction techniques for each resin and gel coat used.

(c) Non-atomized spray application technology shall be used to apply unfilled production resins. Non-atomized spray application technology includes flow coaters, flow choppers, pressure-fed rollers, or other non-spray applications of a design and specifications approved by IDEM, OAQ.

If it is not possible to apply a portion of unfilled resins with non-atomized spray application technology, equivalent emissions reductions must be obtained via use of other emission reduction techniques. Examples of other emission reduction techniques include, but are not limited to, lower HAP monomer content resins and gel coats, closed molding, vapor suppression, vacuum bagging/bonding, or installing a control device.

(d) Optimized spray techniques according to a manner approved by IDEM, OAQ shall be used for the application of all gel coats and filled resins (where fillers are required for corrosion or fire retardant purposes) at all gel coat booth production operations. 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, OAQ, 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, non-VOC, non-HAP solvent shall be used for cleanup.

(2) For VOC and/or HAP containing materials:

(A) Cleanup solvent containers shall be used to transport solvent from drums to work.

(B) Cleanup stations shall be closed containers having soft gasketed spring-loaded closures and shall be kept completely closed when not in use.

(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 shall be kept covered when not in use.

State Rule Applicability - Insignificant Activities

Pursuant to 326 IAC 6-3-2, the allowable particulate matter from the trimmers and mixers shall be limited by the following:

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

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

Testing Requirements

The baghouse controlling PM from the cutting, grinding and preparation operations will be required to be tested to show compliance with 326 IAC 6-3-2. However, since standard CFA emission factors have been used, no VOC testing is required at this time.

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, OAQ, 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 Section D of the permit 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 Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

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

(a) The surface coating operations in Plants 1 and 2, known as EU1, EU2, EU3 EU4, EU5 and EU6 have applicable compliance monitoring conditions as specified below:

(1) The amount of VOC and HAP monomer content delivered to the applicators including cleanup solvents must be monitored and recorded on a monthly basis. This information must be reported to OAQ on a quarterly basis. Material Data Safety Sheets (MSDS) must be kept on file for each coating and cleanup solvent used during each quarter.

(2) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters for EU1, EU2, EU3, EU4, EU5 and EU6. To monitor the performance of the dry filters, weekly observations shall be made of the overspray while the booth is 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.

(3) Monthly inspections shall be performed of the coating emissions from the Plants 1 and 2 stack exhausts, known as Stacks 1, 2, 3, 4, 5 and 6, for 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 an overspray emission, evidence of overspray emission, or other abnormal 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.

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

These monitoring conditions are necessary to ensure compliance with 323 IAC 2-2, 326 IAC 5-1, 326 IAC 8-1-6, 326 IAC 6-3, and 326 IAC 2-7 (Part 70).

(b) The cutting, grinding and preparation area operations have applicable compliance monitoring conditions as specified below:

The Permittee shall record the total static pressure drop across the baghouse controlling the cutting, grinding and preparation area operations, at least once per shift when the cutting, grinding and preparation area processes are in operation. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 1.0 to 3.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

(c) Visible emissions notations of the baghouse exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously “normal” means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

(d) An inspection shall be performed each calender quarter of all bags controlling the operations at this source when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

(e) In the event that bag failure has been observed:

(1) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion.

(2) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

Conclusion

The operation of this a fiberglass vehicle parts manufacturing and painting source shall be subject to the conditions of the attached proposed **Part 70 Permit No. T 039-7653-00104.**

Indiana Department of Environmental Management
Office of Air Quality

Addendum to the
Technical Support Document for a Part 70 Operating Permit

Source Name: **Jason Industries Inc.**
Source Location: **1500 West Lusher, Elkhart, Indiana 46517**
County: **Elkhart**
SIC Code: **3792**
Operation Permit No.: **T 039-7653-00104**
Permit Reviewer: **Frank P. Castelli**

On March 10, 2001, the Office of Air Quality (OAQ) had a notice published in the Elkhart Truth, Elkhart, Indiana, stating that Jason Industries Inc. had applied for a Part 70 Operating Permit to operate a fiberglass vehicle parts manufacturing and painting source. The notice also stated that OAQ proposed to issue a Part 70 Operating Permit for this operation and provided information on how the public could review the proposed Part 70 Operating 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 Part 70 Operating Permit should be issued as proposed.

On March 19, 2001, John Bline of Jason Industries, submitted comments on the proposed Part 70 Operating Permit. The comments are as follows: The permit language, if changed, has deleted language as ~~strikeouts~~ and new language **bolded.**

Comments 1, 2, 3 and 4:

Section A.3(a) and A.3(f), should list equipment as airless or air assist airless.

Section A.3 Item (b), EU 2 equipment listed should include (1) chopper system and (1) wet out gun for rail lamination. Rail operation occurs by the booth and is part of the lamination process. Note: wet out gun output has already been added to total emission unit calculations.

Section A.3 Item (d), cutting, grinding and preparation area(s) operations are actually done in 2 locations in plant one but are utilizing the same bag house (through ducting) to remove particulate matter. Actual cut and grind operations have been drastically reduced by the use of a water jet cutting system. We will be adding a conveyor system to these area(s) in the near future.

Section A.3 Item (g), EU6 Equipped with chopper system and ceramic/dualite bed coat spray system. Output is already included in EU6 emissions calculations. This process and equipment may be deleted at a future date.

Responses 1, 2, 3 and 4:

The description of the equipment in Condition A.3 (a), (b), (d), (f) and (g) as well as in Section D.1 have been changed as follows:

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

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

Plant 1

(a) One (1) gelcoat booth, known as EU1, equipped with air-assisted airless **or airless** spray applicators, equipped with dry filters for overspray control, equipped with a 12,800 cubic feet per minute exhaust fan, exhausting through Stack 1, capacity: 8.0 fiberglass parts per hour.

(b) One (1) resin chop booth, known as EU2, equipped with a chopper system **and (1) wet out gun for rail lamination**, equipped with dry filters for overspray control, equipped with a 12,800 cubic feet per minute exhaust fan, exhausting through Stack 2, capacity: 7.0 fiberglass parts per hour.

(d) **Two (2)** ~~One (1)~~ cutting, grinding and preparation area**s**, equipped with one (1) recirculating baghouse dust collector for particulate matter control, known as BH-1, exhausted through Stack 7 at 10,000 cubic feet per minute, capacity: 700 pounds of fiberglass per hour.

Plant 2

(f) One (1) gelcoat booth, known as EU5, equipped with air assisted airless **or airless** spray applicators, equipped with dry filters for overspray control, equipped with a 3,000 cubic feet per minute exhaust fan, exhausting through Stack 5, capacity: 6.0 fiberglass parts per hour.

(g) One (1) resin chop booth, known as EU6, equipped with a chopper system **and ceramic/dualite bed coat spray system**, equipped with dry filters for overspray control, equipped with a 5,000 cubic feet per minute exhaust fan, exhausting through Stack 6, capacity: 3.0 fiberglass parts per hour.

Comment 5:

Section D.1.1(f), language should state that filled resin means a resin containing inert filler material equal to or greater than thirty-five percent by weight per 326 IAC 20-25-2 definitions item 12. Section 16 also states “Inert filler” means any non-hap material, such as silica micro-spheres or microballoons, added to a resin or gel coat to alter density of the resin or gelcoat or change other physical properties of the resin or gel coat. This term does not include pigments. We use calcium carbonate fillers with loading factors greater than 40% by weight.

Response 5:

Condition D.1.1(f) has been clarified by adding the definitions of a filled resin and an inert filler pursuant to the definitions contained in 326 IAC 20-25-2 as follows:

(f) Optimized spray techniques according to a manner approved by IDEM, OAQ shall be used for the application of all gel coats and filled resins (where fillers are required for corrosion or fire retardant purposes) at all gel coat booth production operations. **A filled resin means a resin containing inert filler material equal to or greater than thirty-five percent by weight pursuant to 326 IAC 20-25-2(12). Pursuant to 326 IAC 20-25-2(16) an inert filler means any non-HAP material, such as silica micro-spheres or micro-balloons, added to a resin or gel coat to alter density of the resin or gelcoat or change other physical properties of the resin or gel coat. This term does not include pigments.** 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.

Comment 6:

Section D.2.1, please note that BH-1 is a recirculating exhaust bag house (vented inside facility) thus monitoring/reporting requirements are reduced.

Response 6:

Compliance Monitoring Conditions D.2.4, D.2.5 and D.2.6 all state that the requirements are necessary when the baghouse exhaust is vented to the atmosphere. Note that although this baghouse currently vents inside the building, the PM and PM_{10} emissions are exhausted to the atmosphere through open windows and doors. Therefore, no changes to these conditions are necessary.

Comment 7:

Section D.1.1(d), pages 11 and 13 of TSD list styrene percentage of production - Non-corrosion resistant filled (greater than 35% by weight) as 35% styrene content by weight. 326 IAC 20-25-3 Section 3 lists the same resin styrene limits as 38% (these are non-watercraft limits). Jason currently uses resin with lower than required styrene percentage, but would like the permit to reflect actual statute limits.

Response 7:

The table in Condition D.1.1(d) has been revised to list the 38% styrene allowed pursuant to 326 IAC 20-25-3. The 38% styrene limit was stated as the maximum styrene content for the production noncorrosion resistant filled resins in the Best Available Control Technology (BACT) analysis provided with the permit application. The higher styrene limit for the resins will not change the overall VOC limits that are also part of the BACT determination. The VOC emissions will still be limited to a total of 94.8 tons per year for EU1 and EU2 and a total of 90.1 tons per year for EU5 and EU6. Therefore the revised condition is as follows:

D.1.1 BACT [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6 (New facilities: general reduction requirements), BACT for Plant 1, comprised of EU1, EU2, EU3 and EU4 and Plant 2 comprised of EU5 and EU6, is the following:

(d) The HAP monomer content of resins and gel coats used shall be limited to the following or their equivalent on an emissions mass basis:

Type of Gel Coat or Resin	HAP Monomer Content % by weight
Production[1] Gel Coat	37
Tooling[2] Gel Coat	38
Production **Filled** Resin[3]	~~35~~ **38**
Tooling Resin	43

[1] Production refers to the manufacture of parts.
[2] Tooling refers to the manufacture of the molds from which parts are manufactured.
[3] **Filled resin means a resin containing inert filler material equal to or greater than thirty-five percent (35%) by weight pursuant to 326 IAC 20-25-2(12).**

HAP monomer contents shall be calculated on a**n unfilled** ~~neat~~ basis, which means excluding any filler. Compliance with these HAP monomer content limits shall be demonstrated on a monthly basis.

Upon further review, the OAQ has decided to make the following changes to the Part 70 Operating Permit: The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language is **bolded)**:

Change 1 Condition A.1 (General Information) has been revised to include a general source phone number.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

General Source Phone Number**:** 219 294-7595

Change 2 Condition B.7 (Duty to Supplement and Provide Information) was revised to change a rule reference. Subpart (c) references 326 IAC 17. This rule was repealed by the Air Pollution Control Board on January 26, 2000. The new rule reference has been added as follows:

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

(c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17**.1**. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

Change 3 Condition B.8 (Compliance with Permit Conditions) has been changed to change "condition" to "Section" in subpart (c).

B.8 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

(c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in ~~condition~~ **Section** B, Emergency Provisions.

Change 4 Condition B.13 (Permit Shield) has been revised to add a word for clarification.

B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

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

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

Change 5 Condition B.18 (Permit Amendment or Modification) has been changed to replace “should” with “shall” in subpart (b).

B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

(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~~ **shall** be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

Change 6 Condition B.20 (Operational Flexibility) has been changed to clarify the reason a certification is not required.

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

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

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

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

(3) Any change in emissions; and

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

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification ~~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).

Change 7 Condition B.24 (Annual Fee Payment) has been changed to add "to" in subpart (a) as follows:

B.24 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. Pursuant **to** 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAM, the applicable fee is due April 1 of each year.

Change 8 Condition C.8 (Asbestos Abatement Projects) has been revised to clarify whether or not the requirement for an inspector be accredited is federally enforceable. 326 IAC 14-10 (Emission Standards for Asbestos) was not submitted as a SIP and not approved. Therefore, this requirement cannot be federally enforceable.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 17] [40 CFR 61, Subpart M]

(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, **pursuant to the provision of 40 CFR 61, Subpart M,** is federally enforceable.

Change 9 Condition C.17 (Compliance Monitoring Plan – Failure to Take Response Steps) has been changed to remove a reference to a condition that no longer exists.

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

(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. The compliance monitoring plan can be either an entirely new document, consist in whole of information contained in other documents, or consist of a combination of new information and information contained in other documents. If the compliance monitoring plan incorporates by reference information contained in other documents, the Permittee shall identify as part of the compliance monitoring plan the documents in which the information is found. The elements of the compliance monitoring plan are:

(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

Change 10 Condition C.21 (d) has revised as follows

C.21 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

(d) Unless otherwise specified in this permit, ~~any quarterly or semi-annual~~ **all** report**s** required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. **All** ~~The~~ reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Change 11 Appropriate forms have been revised to include the IDEM, OAQ address. Also, the address has been revised to be consistent with the address references in Section B.

~~P.O. Box 6015~~
100 North Senate Avenue
~~100 North Senate Avenue~~
P.O. Box 6015

Change 12 The requirement to perform stack testing in Condition D.2.3 on the cutting, grinding and preparation area baghouse has been deleted since the compliance monitoring requirements contained in the conditions entitled, Visible Emissions Notations, Parametric Monitoring, Baghouse Inspections and Broken or Failed Bag Detection should be sufficient to ensure compliance with 326 IAC 6-3-2. All subsequent conditions have been re-numbered and internal cross-references changed appropriately as follows:

~~D.2.3 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]~~

~~During the period between 3 and 12 months after issuance of this permit, in order to demonstrate compliance with Condition D.2.1, the Permittee shall perform PM testing utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C- Performance Testing.~~

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

D.2.**3** ~~4~~ Visible Emissions Notations

(a) Visible emission notations of the baghouse stack exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

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

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

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

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. 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.

D.2.**4** ~~5~~ Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the cutting, grinding and preparation area processes, at least once per shift when these processes are in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 1.0 and 3.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading. 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.

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

D.2.**5** ~~6~~ Baghouse Inspections

An inspection shall be performed each calender quarter of all bags controlling the cutting, grinding and preparation area operations when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

D.2.**6** ~~7~~ Broken or Failed Bag Detection

In the event that bag failure has been observed:

(a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. 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) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

D.2.**7** ~~8~~ Record Keeping Requirements

(a) To document compliance with Condition D.2.**3** ~~4~~, the Permittee shall maintain records of visible emission notations of the baghouse stack exhaust once per shift.

(b) To document compliance with Condition D.2.**4** ~~5~~, the Permittee shall maintain the following:

(1) Records of the following operational parameters during normal operation when venting to the atmosphere once per shift:

(A) Inlet and outlet differential static pressure; and

(B) Cleaning cycle operation.

(2) Documentation of the dates vents are redirected.

(**c**~~b~~) To document compliance with Condition D.2.**5** ~~6~~, the Permittee shall maintain records of the results of the inspections required under Condition D.2.**5** ~~6~~ and the dates the vents are redirected.

(**d**~~c~~) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

BACT Cost Analysis

Source Name: Jason Industries Inc. **Plant 1 (EU 1, 2, 3 & 4)**

Location: 1500 West Lusher, Elkhart, Indiana

Permit No.: T 039-7653-00104

Permit Reviewer: FPC/MES

Capital Cost

Option	Base Price	Direct Cost	Indirect Cost	Total
Catalytic Incineration	$1,312,398 - 2,737,400			$1,312,398 - 2,737,400
Thermal Incineration	$497,556 - 2,583,266			$497,556 - 2,583,266
Rotary Concentrator w/o Incineration	$1,680,797			$1,680,797
HVLP Applicators and Work Place Standards	$0			$0

The range of base/direct & indirect costs for catalytic and thermal incineration reflect 0% to 95% heat recovery.

Annual Operating, Maintenance & Recovery Cost

Option	Direct Cost	Indirect Cost	Capital Recovery Cost	Total
Catalytic Incineration	$274,261 - $2,706,897	$72,211 - $139,310	$154,421 - $398,812	$812,383 - $2,980,411
Thermal Incineration	$526,952 - $7,392,082	$49,716 - $133,145	$72,498 - $376,356	$1,036,452 - $7,514,287
Rotary Concentrator w/o Incineration	$112,771	$110,810	$244,875	$468,456
HVLP Applicators and Work Place Standards	$0	$0	$0	$0

The range of costs for catalytic and thermal incineration reflect 0% to 95% heat recovery.

Evaluation

Option	Potential Emissions (tons/yr)	Emissions Removed (tons/yr)	Control Efficiency (%)	$/ton removed
Catalytic Incineration	377.1	333	88.3	$2,439 - $8,950
Thermal Incineration	377.1	333	88.3	$3,112 - $22,565
Rotary Concentrator w/o Incineration	377.1	333	88.3	$1,407
HVLP Applicators and Work Place Standards	377.1	0	0	$0

Note: VOC Baseline = 207.56 TPY for EU1 & EU2 and 169.5 TPY for EU 3 & EU4 or a total of 377.1 TPY separately, but for fairness and unbiased evaluation a total of 333 TPY removed.

Methodology:

Emissions removed = (potential emissions)*(control efficiency)
$/ton removed = total annual cost/emissions removed

The cost breakdown is as follows:

1. Capital Cost

a) Base price: purchase price, auxiliary equipment, instruments, controls, taxes and freight.

b) Direct installation cost: foundations/supports, erection/handling, electrical, piping, insulation, painting, site preparation and building/facility.

c) Indirect installation cost: engineering, supervision, construction/filed expenses, construction fee, start up, performance test, model study and contingencies.

2. Annual Cost

a) Direct operating cost: operating labor (operator, supervisor), labor and material maintenance, operating materials, utilities (electricity, gas).

b) Indirect operating cost: overhead, property tax, insurance, administration and capital recovery cost (for X yrs life of the system at X% interest rate).

Reinforced Plastics and Composites

Company Name: **Jason Industries Inc.**
Address City IN Zip: **1500 West Lusher, Elkhart, Indiana 46517**
Part 70: **T 039-7653**
Plt ID: **039-00104**
Reviewer: **Frank P. Castelli**
Date: **December 13, 1996**

Plant 1 Material (Application Method)	Density (lb/gal)	Weight % Monomer VOC	CFA Unified Emission Factor (lbs/ton)	Gallons per unit	Units per hour	Pounds VOC per hour	Pounds VOC per day	VOC tons per year	PM tons per year	Transfer Efficiency
Plant 1										
EU 1										
Gelcoat (uncontrolled)	10.43	37.0%	377.00	1.44	8.00	22.65	543.57	99.20	82.89	75.00%
EU 2										
Fiberglass Resin (Mech Atomized)	9.00	35.0%	140.00	5.61	7.00	24.74	593.76	108.36	251.55	75.00%
EU 3										
Basecoat (Dupont)	8.25	80.0%	0.00	0.4400	8.00	23.2320	557.57	101.756	6.360	75.00%
Wipedown (3909S)	8.30	6.02%	0.00	0.0156	8.00	0.0625	1.50	0.274	0.000	100.00%
EU 4										
Clearcoat (Dupont)	7.79	0.5948	0.00	0.36	6.00	10.0083	240.20	43.837	7.466	75.00%
Subtotal Plant 1								**353.43**	**348.27**	
Plant 2										
EU 5										
Gelcoat (uncontrolled)	10.76	37.0%	377.00	1.00	6.00	12.17	292.07	53.30	44.54	75.00%
EU 6										
Fiberglass Resin (Mech Atomized)	9.00	35.0%	140.00	4.45	3.00	8.41	201.85	36.84	85.52	75.00%
Subtotal Plant 2								**90.14**	**130.05**	
				Total				**443.57**	**478.32**	
				VOC Control	0%					
				PM Control	95.0%					
				Potential Before Controls				**443.57**	**478.32**	
				Potential After Controls				**443.57**	**23.92**	

Note the Sealer has already been removed from EU3

Sealer	7.35	81%	0%	0.13000	8	6.19	148.6	27.12	1.59	0.75

METHODOLOGY

Potential VOC Pounds per Hour =Density (lb/gal)* Gal of Material (gal/unit) * Maximum (unit/hr) * Emission factor (lb/ton)*(1 ton/2000 lbs)
Potential VOC Pounds per Day =Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * (24 hrs / 1 day) * Emission factor(lb/ton)*(1 ton/2000 lbs)
Potential VOC Tons per Year = Density (lb/gal)* Gal of Material (gal/unit) * Maximum (unit/hr) * (8760 hr/yr) * (1 ton / 2000 lbs) * Emission factor(lb/ton)*(1 ton/2000lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1 - Weight % Volatiles) * (1 - Transfer efficiency) * (8760 hr/yr) * (1 ton / 2000 lbs)
Total = Sum of all worst case coatings and solvents used
Emission Factor (lbs VOC/ton) taken from "Unified Emission Factors for Open Molding of Composites", Composite Fabricators Association (CFA), April 1999

Reinforced Plastics and Composites

Company Name: **Jason Industries Inc.**
Address City IN Zip: **1500 West Lusher, Elkhart, Indiana 46517**
Part 70: **T 039-7653**
Plt ID: **039-00104**
Reviewer: **Frank P. Castelli**
Date: **December 13, 1996**

Material **Plant 1**	Density (lbs/gal)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Flash-off (fraction)	Weight % Styrene	Weight % Toluene	Weight % MEK	Weight % Methanol	Weight % MIBK	Weight % Xylene	Weight % Ethylbenzene	Styrene Emissions (tons/yr)	Toluene Emissions (tons/yr)	MEK Emissions (tons/yr)	Methanol Emissions (tons/yr)	MIBK Emissions (tons/yr)	Xylene Emissions (tons/yr)	Ethylbenzene Emissions (tons/yr)
EU 1																		
Gelcoat	From Page 1 of 3											99.20	0.00	0.00	0.00	0.00	0.00	0.00
EU 2																		
Fiberglass Resin	From Page 1 of 3											108.36	0.00	0.00	0.00	0.00	0.00	0.00
EU 3																		
Basecoat (Dupont)	8.25	0.440	8.00	1.00	0.00%	12.17%	0.00%	0.00%	0.00%	37.44%	9.36%	0.00	15.48	0.00	0.00	0.00	47.62	11.91
Wipedown (3909S)	7.00	0.0156	8.00	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
EU 4																		
Clearcoat	7.79	0.360	6.00	1.00	0.00%	4.00%	8.00%	0.00%	8.00%	26.00%	7.30%	0.00	2.95	5.90	0.00	5.90	19.16	5.38
											Plant 1 Subtotal:	**207.56**	**18.43**	**5.90**	**0.00**	**5.90**	**66.78**	**17.29**
											Plant 1 Total HAPs:	**321.9**	**tons/yr**					
Plant 2																		
EU 5																		
Gelcoat	From Page 1 of 3											53.30	0.00	0.00	0.00	0.00	0.00	0.00
EU 6																		
Fiberglass Resin	From Page 1 of 3											36.84	0.00	0.00	0.00	0.00	0.00	0.00
											Plant 2 Subtotal:	**90.14**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**
											Plant 2 Total HAPs:	**90.14**	**tons/yr**					
										TOTALS:	**(tons/yr):**	**297.7**	**18.4**	**5.90**	**0.000**	**5.896**	**66.8**	**17.3**
											Grand Total HAPs:	**412.0**	**tons/yr**					

METHODOLOGY

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

Reinforced Plastics and Composites

Company Name: **Jason Industries Inc.**
Address City IN Zip: **1500 West Lusher, Elkhart, Indiana 46517**
Part 70: **T 039-7653**
Plt ID: **039-00104**
Reviewer: **Frank P. Castelli**
Date: **December 13, 1996**

Material **Plant 1**	Density (lbs/gal)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Flash-off (fraction)	Weight % Styrene	Weight % Toluene	Weight % MEK	Weight % Methanol	Weight % MIBK	Weight % Xylene	Weight % Ethylbenzene	Styrene Emissions (tons/yr)	Toluene Emissions (tons/yr)	MEK Emissions (tons/yr)	Methanol Emissions (tons/yr)	MIBK Emissions (tons/yr)	Xylene Emissions (tons/yr)	Ethylbenzene Emissions (tons/yr)
EU 1																		
Gelcoat	From Page 1 of 3											99.20	0.00	0.00	0.00	0.00	0.00	0.00
EU 2																		
Fiberglass Resin	From Page 1 of 3											108.36	0.00	0.00	0.00	0.00	0.00	0.00
EU 3																		
Basecoat (Dupont)	8.25	0.440	8.00	1.00	0.00%	12.17%	0.00%	0.00%	0.00%	37.44%	9.36%	0.00	15.48	0.00	0.00	0.00	47.62	11.91
Wipedown (3909S)	7.00	0.0156	8.00	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
EU 4																		
Clearcoat	7.79	0.360	6.00	1.00	0.00%	4.00%	8.00%	0.00%	8.00%	26.00%	7.30%	0.00	2.95	5.90	0.00	5.90	19.16	5.38
											Plant 1 Subtotal:	**207.56**	**18.43**	**5.90**	**0.00**	**5.90**	**66.78**	**17.29**
											Plant 1 Total HAPs:	**321.9**	**tons/yr**					
Plant 2																		
EU 5																		
Gelcoat	From Page 1 of 3											53.30	0.00	0.00	0.00	0.00	0.00	0.00
EU 6																		
Fiberglass Resin	From Page 1 of 3											36.84	0.00	0.00	0.00	0.00	0.00	0.00
											Plant 2 Subtotal:	**90.14**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**
											Plant 2 Total HAPs:	**90.14**	**tons/yr**					
										TOTALS:	**(tons/yr):**	**297.7**	**18.4**	**5.90**	**0.000**	**5.896**	**66.8**	**17.3**
											Grand Total HAPs:	**412.0**	**tons/yr**					

METHODOLOGY

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

Appendix A: Emission Calculations
Baghouse Operations

Company Name: Jason Industries Inc.
Address City IN Zip: 1500 West Lusher, Elkhart, IN 46517
Part 70: T039-7653
Plt ID: T039-00104
Reviewer: Frank P. Castelli
Date: December 13, 1996

Cutting , Grinding and Preparation Area

Unit ID	Control Efficiency (%)	Grain Loading per Actual Cubic foot of Outlet Air (grains/cub. ft.)	Gas or Air Flow Rate (acfm.)	Emission Rate before Controls (lbs/hr)	Emission Rate before Controls (tons/yr)	Emission Rate after Controls (lbs/hr)	Emission Rate after Controls (tons/yr)
BH-1	99.0%	0.004	10000.0	34.3	150	0.343	1.50

Methodology
Emission Rate in lbs/hr (after controls) = (grains/cub. ft.) (sq. ft.) ((cub. ft./min.)/sq. ft.) (60 min/hr) (lb/7000 grains)
Emission Rate in tons/yr = (lbs/hr) (8760 hr/yr) (ton/2000 lb)

Emission Rate in lbs/hr (before controls) = Emission Rate (after controls): (lbs/hr)/(1-control efficiency)
Emission Rate in tons/yr = (lbs/hr) (8760 hr/yr) (ton/2000 lb)

Allowable Rate of Emissions

Process Rate (lbs/hr)	Process Weight Rate (tons/hr)	Allowable Emissions (lbs/hr)
700	0.35	2.03

Methodology
Allowable Emissions = 4.10(Process Weight Rate)^0.67