

PART 70 OPERATING PERMIT OFFICE OF AIR MANAGEMENT

**Premier Fiberglass
55080 Philips Street
Elkhart, Indiana 46514**

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T039-7889-00336	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date:

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

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

The Permittee owns and operates a stationary fiberglass running board manufacturing operation.

Responsible Official: Jerry L. Sears
Source Address: 55080 Philips Street, Elkhart, Indiana 46514
Mailing Address: 55080 Philips Street, Elkhart, Indiana 46514
SIC Code: 3792
County Location: Elkhart
County Status: Attainment for all criteria pollutants
Source Status: Part 70 Permit Program
Minor Source, under PSD Rules;
Major Source, Section 112 of the Clean Air Act

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

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

Plant 1

- (a) one (1) gel coat spray booth, (ID No. Booth 1), utilizing an airless spray application system, coating a maximum of 10 plastic mold units per hour, with dry filters for particulate matter overspray control, and exhausting at two stacks (ID Nos. S1 and S2);
- (b) one (1) resin spray booth, (ID No. Booth 2), utilizing an air-assisted airless spray application system, coating a maximum of 10 plastic mold units per hour, with dry filters for particulate matter overspray control, and exhausting at two stacks (ID Nos. S3 and S4); and

Plant 2

- (c) one (1) plastic grinding area (ID No. V9) processing a maximum of 218 pounds per hour, with a baghouse for particulate matter control, and exhausting at one (1) stack (ID No. S5).

A.3 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 does not currently have any insignificant activities, as defined in 326 IAC 2-7-1 (21) that have applicable requirements.

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

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

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

SECTION B GENERAL CONDITIONS

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

- (a) Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7.
- (b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-1-3.2 or 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled "Permit Shield."

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

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

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

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

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

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

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

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

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

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

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

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

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

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

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

- (b) The Permittee shall furnish to IDEM, OAM within a reasonable time, any information that IDEM, OAM may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.
- (c) Upon request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAM along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

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

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

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

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

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

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

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

and

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

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
- (1) The identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was based on continuous or intermittent data;
 - (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3);
 - (5) Any insignificant activity that has been added without a permit revision;
 - (6) Such other facts, as specified in Sections D of this permit, as IDEM, OAM may require to determine the compliance status of the source.

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

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

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

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

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

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

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

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

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

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

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

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

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

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAM may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(9) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAM by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

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

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

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

- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:
 - (1) The applicable requirements are included and specifically identified in this permit; or
 - (2) The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.
- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application.
- (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM has issued the modification. [326 IAC 2-7-12(b)(8)]

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

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

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

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

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

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

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

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

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

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

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)]

- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAM to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

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

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

Request for renewal shall be submitted to:

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

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
 - (1) A timely renewal application is one that is:
 - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM on or before the date it is due. [326 IAC 2-5-3]

- (2) If IDEM, OAM, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.
- (c) **Right to Operate After Application for Renewal** [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAM takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAM, any additional information identified as being needed to process the application.
- (d) **United States Environmental Protection Agency Authority** [326 IAC 2-7-8(e)]
If IDEM, OAM fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

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

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule.
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

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

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

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

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

- (a) For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.
- (b) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).

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

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-1 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

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

and

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

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

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

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

- (b) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:
- (1) A brief description of the change within the source;
 - (2) The date on which the change will occur;
 - (3) Any change in emissions; and
 - (4) Any permit term or condition that is no longer applicable as a result of the change.

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

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAM, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.23 Construction Permit Requirement [326 IAC 2]

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

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

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.
[326 IAC 2-7-6(6)]
 - (1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM, or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAM, nor an authorized representative, may disclose the information unless and until IDEM, OAM makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]
 - (2) The Permittee, and IDEM, OAM acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

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

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

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

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

- (a) The Permittee shall pay annual fees to IDEM, OAM within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAM the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

- (a) The total source potential to emit of any criteria pollutant is less than 250 tons per year. Therefore the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.
- (b) Any change or modification which may increase potential to emit to 250 tons per year from this source, shall cause this source to be considered a major source under PSD, 326 IAC 2-2 and 40 CFR 52.21, and shall require approval from IDEM, OAM prior to making the change.

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

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

C.3 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

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

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

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

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

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

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

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

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

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

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

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

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

The Permittee:

- (a) Has certified that all facilities at this source are in compliance with all applicable requirements; and
- (b) Has submitted a statement that the Permittee will continue to comply with such requirements; and

- (c) Will comply with such applicable requirements that become effective during the term of this permit.

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

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

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

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

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

C.12 Monitoring Methods [326 IAC 3]

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

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

C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

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

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

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

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

- (c) If the ERP is disapproved by IDEM, OAM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAM, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

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

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

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

C.15 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5][326 IAC 2-7-6] [326 IAC 1-6]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
 - (1) This condition;
 - (2) The Compliance Determination Requirements in Section D of this permit;
 - (3) The Compliance Monitoring Requirements in Section D of this permit;
 - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and

- (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :
 - (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
 - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
 - (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;
 - (3) An automatic measurement was taken when the process was not operating; or
 - (4) The process has already returned to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
[326 IAC 2-7-6]

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

IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.

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

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

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

C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
- (1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
 - (2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:
- Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM on or before the date it is due.

C.18 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]

- (a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.

- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.19 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
 - (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
 - (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;

- (4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

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

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported.
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period.
- (e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports.
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

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

Stratospheric Ozone Protection

C.21 Compliance with 40 CFR 82 and 326 IAC 22-1

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) gel coat spray booth, (ID No. Booth 1), utilizing an airless spray application system, coating a maximum of 10 plastic mold units per hour, with dry filters for particulate matter overspray control, and exhausting at two stacks (ID Nos. S1 and S2); and
- (b) one (1) resin spray booth, (ID No. Booth 2), utilizing an air-assisted airless spray application system, coating a maximum of 10 plastic mold units per hour, with dry filters for particulate matter overspray control, and exhausting at two stacks (ID Nos. S3 and S4).

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

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

- (a) Pursuant to CP-039-4651-00336, issued on October 24, 1996, and 326 IAC 8-1-6 (New Facilities, General Reduction Requirements), the Best Available Control Technology (BACT) for the gel coat and resin spray booths (Booth 1 and Booth 2) shall be the use of the as-installed airless and air-assisted airless spray applicators at all times that the spray booths are in operation.
- (b) The total emissions of volatile organic compounds (VOC) from the gel coat and resin spray booths (Booth 1 and Booth 2) shall be limited to 7.06 tons per month based on a maximum of 14.3% by weight of the gel coat (containing a maximum of 32.62% styrene monomer) usage being emitted and a maximum of 9.1% by weight of the resin (containing a maximum of 37.9% styrene monomer) usage being emitted.

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

The PM from the gel coat and resin spray booths (Booth 1 and Booth 2) shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

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 this facility and any control devices.

Compliance Determination Requirements

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

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.5 Volatile Organic Compounds (VOC)

Compliance with the VOC usage limitation 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. IDEM, OAM reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.6 VOC Emissions

Compliance with Condition D.1.1 shall be demonstrated at the end of each month based on the total volatile organic compound usage for the most recent month.

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

D.1.7 Particulate Matter (PM)

The dry filters for PM control shall be in operation at all times when the gel coat and resin spray booths (Booth 1 and Booth 2) are in operation.

D.1.8 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the gel coat and resin surface coating booth stacks (S1, S2, S3, and S4) 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.1.9 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/or the VOC emission limits established in Condition D.1.1.
 - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The volume weighted VOC content of the coatings used for each month;
 - (4) The cleanup solvent usage for each month;
 - (5) The total VOC usage for each month; and
 - (6) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Conditions D.1.7 and D.1.8, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.10 Reporting Requirements

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

SECTION D.2 FACILITY OPERATION CONDITIONS

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

Plant 2

- (c) one (1) plastic grinding area (ID No. V9) processing a maximum of 218 pounds per hour, with a baghouse for particulate matter control, and exhausting at one (1) stack (ID No. S5).

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

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

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the plastic grinding area shall not exceed 0.93 pounds per hour when operating at a process weight rate of 218 pounds per hour.

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

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

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

Compliance Determination Requirements

D.2.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.2.3 Particulate Matter (PM)

The baghouse for PM control shall be in operation at all times when the plastic grinding area is in operation and exhausting to the outside atmosphere.

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

D.2.4 Visible Emissions Notations

- (a) Daily visible emission notations of the plastic grinding area baghouse stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.2.5 Baghouse Inspections

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

Record Keeping and Reporting 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.2.4, the Permittee shall maintain records of daily visible emission notations of the plastic grinding area baghouse stack exhaust.
- (b) 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.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

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

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Premier Fiberglass
Source Address: 55080 Philips Street, Elkhart, Indiana 46514
Mailing Address: 55080 Philips Street, Elkhart, Indiana 46514
Part 70 Permit No.: T039-7889-00336

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

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

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

Source Name: Premier Fiberglass
Source Address: 55080 Philips Street, Elkhart, Indiana 46514
Mailing Address: 55080 Philips Street, Elkhart, Indiana 46514
Part 70 Permit No.: T039-7889-00336

This form consists of 2 pages

Page 1 of 2

Check either No. 1 or No.2

9 1. This is an emergency as defined in 326 IAC 2-7-1(12)
C The Permittee must notify the Office of Air Management (OAM), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
C The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

9 2. This is a deviation, reportable per 326 IAC 2-7-5(3)(c)
C The Permittee must submit notice in writing within ten (10) calendar days

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

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency/Deviation:

Describe the cause of the Emergency/Deviation:

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

Page 2 of 2

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

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

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

Part 70 Quarterly Report

Source Name: Premier Fiberglass
Source Address: 55080 Philips Street, Elkhart, Indiana 46514
Mailing Address: 55080 Philips Street, Elkhart, Indiana 46514
Part 70 Permit No.: T039-7889-00336
Facility: gel coat and resin spray booths (Booth 1 and Booth 2)
Parameter: VOC
Limit: The total emissions of volatile organic compounds (VOC) from the gel coat and resin spray booths (Booth 1 and Booth 2) shall be limited to 7.06 tons per month based on a maximum of 14.3% by weight of the gel coat (containing a maximum of 32.62% styrene monomer) usage being emitted and a maximum of 9.1% by weight of the resin (containing a maximum of 37.9% styrene monomer) usage being emitted.

YEAR: _____

Month	VOC Usage This Month (tons)
Month 1	
Month 2	
Month 3	

- 9 No deviation occurred in this quarter.
- 9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

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

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

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

Source Name: Premier Fiberglass
 Source Address: 55080 Philips Street, Elkhart, Indiana 46514
 Mailing Address: 55080 Philips Street, Elkhart, Indiana 46514
 Part 70 Permit No.: T039-7889-00336

Months: _____ **to** _____ **Year:** _____

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

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

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

Form Completed By: _____
 Title/Position: _____
 Date: _____
 Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Management

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

Source Background and Description

Source Name: Premier Fiberglass
Source Location: 55080 Philips Street, Elkhart, Indiana 46514
County: Elkhart
SIC Code: 3792
Operation Permit No.: T039-7889-00336
Permit Reviewer: Trish Earls/EVP

The Office of Air Management (OAM) has reviewed a Part 70 permit application from Premier Fiberglass relating to the operation of a stationary fiberglass running board manufacturing operation.

Source Definition

This fiberglass running board manufacturing company consists of two (2) plants:

- (1) Plant 1 is located at 55080 Philips Street, Elkhart, Indiana 46514; and
- (2) Plant 2 is also located at 55080 Philips Street, Elkhart, Indiana 46514.

Since the two (2) plants are located in 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) gel coat spray booth, (ID No. Booth 1), utilizing an airless spray application system, coating a maximum of 10 plastic mold units per hour, with dry filters for particulate matter overspray control, and exhausting at two stacks (ID Nos. S1 and S2);
- (b) one (1) resin spray booth, (ID No. Booth 2), utilizing an air-assisted airless spray application system, coating a maximum of 10 plastic mold units per hour, with dry filters for particulate matter overspray control, and exhausting at two stacks (ID Nos. S3 and S4); and

Plant 2

- (c) one (1) plastic grinding area (ID No. V9) processing a maximum of 218 pounds per hour, with a baghouse for particulate matter control, and exhausting at one (1) stack (ID No. S5).

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

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

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

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(20):

- (a) natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units (Btu) per hour:
 - (1) one (1) natural gas fired air make-up unit (ID No. A1), located in Plant 1, rated at 0.75 million (MM) British thermal units (Btu) per hour;
 - (2) two (2) natural gas fired radiant heaters, located in Plant 1, each rated at 0.60 MMBtu per hour; and
 - (3) two (2) natural gas fired radiant heaters, located in Plant 2, each rated at 0.60 MMBtu per hour.

Note: one (1) natural gas fired air make-up unit, located in Plant 2, rated at 0.75 MMBtu per hour, has been removed from the source

Existing Approvals

The source has been operating under the following approvals:

- (a) CP-039-4651-00336, issued on October 24, 1996.

Enforcement Issue

There are no Enforcement actions pending.

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 16, 1996. Additional information was received on September 5, 1997.

A notice of completeness letter was mailed to the source on March 14, 1997.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (3 pages).

Plastic Grinding Operation

Measurements supplied by the applicant show that 0.125 pounds of particulate matter are collected per manufactured plastic part. At a production rate of 10 parts per hour, potential PM emissions from plastic grinding operations are calculated as follows:

$$\frac{0.125 \text{ lb}}{\text{part}} \times \frac{10 \text{ part}}{\text{hour}} \times \frac{8,760 \text{ hr}}{\text{year}} \times \frac{1 \text{ ton}}{2,000 \text{ lb}} = 5.48 \text{ tons per year PM collected}$$

Given the control efficiency of 95% for the baghouse controlling the grinding area PM emissions, potential PM emissions from plastic grinding operations before controls are 5.48 tons per year / 0.95 = 5.77 tons per year. Potential PM emissions after controls are 5.77 TPY - 5.48 TPY = 0.29 TPY.

Potential Emissions

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

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

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

HAP's	Potential Emissions (tons/year)
Styrene	greater than 10
Dimethyl Phthalate	less than 10
Methyl Ethyl Ketone	less than 10
Glycol Ethers	less than 10
TOTAL	greater than 25

- (a) The potential emissions (as defined in the Indiana Rule) of particulate matter (PM) and particulate matter with an aerodynamic diameter less than or equal to 10 microns (PM-10) are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

- (b) The potential emissions (as defined in Indiana Rule) of any single HAP is equal to or greater than ten (10) tons per year and the potential emissions (as defined in Indiana Rule) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (c) **Fugitive Emissions**
 Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

The following table shows the actual emissions from the source. Because there are no emission statements currently on file with the OAM, this information reflects 1996 emission data provided by the applicant.

Pollutant	Actual Emissions (tons/year)
PM	1.9
PM-10	1.9
SO ₂	0.0
VOC	18.6
CO	0.0
HAP (Styrene)	17.3
NO _x	0.0

Limited Potential to Emit

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

Process/ facility	Limited Potential to Emit (tons/year)						
	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Resin and Gelcoat Spray Booths	8.63	8.63	0.00	83.84	0.00	0.00	78.80
Grinding	0.29	0.29	0.00	0.00	0.00	0.00	0.00
Natural Gas Combustion	0.16	0.16	0.01	0.08	0.29	1.38	0.00
Total Emissions	9.08	9.08	0.01	83.92	0.29	1.38	78.80

Attached Tables A to B summarize the permit conditions and requirements

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
TSP	attainment
PM-10	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as attainment for ozone.

Part 70 Permit Conditions

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

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

Federal Rule Applicability

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

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

This source is not subject to 326 IAC 2-2 (PSD) because potential emissions of any regulated air pollutant are less than 250 tons per year.

326 IAC 2-6 (Emission Reporting)

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

326 IAC 5-1 (Visible Emissions Limitations)

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

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

State Rule Applicability - Individual Facilities

326 IAC 6-3-2 (Process Operations)

Pursuant to CP 039-4651-00336, issued on October 24, 1996, the particulate matter (PM) emissions from the plastic grinding operation shall be limited to 0.93 pounds per hour (4.1 tons per year). This emission limit is based on a process weight rate of 218 pounds per hour and the following equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and}$$
$$P = \text{process weight rate in tons per hour}$$
$$= 0.109 \text{ tons per hour}$$

$$E = 4.10 (0.109)^{0.67}$$
$$E = 0.93 \text{ pounds per hour (4.1 tons per year)}$$

Potential PM emissions after control from the plastic grinding operation are 0.29 tons per year, therefore, the plastic grinding operation will comply with 326 IAC 6-3-2.

The PM overspray from the gel coat and resin spray booths (Booth 1 and Booth 2) shall be limited by the following:

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

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

The gel coat and resin spray booths (Booth 1 and Booth 2) will comply with 326 IAC 6-3-2 by using dry filters for PM overspray control.

326 IAC 8-1-6 (New Facilities, General Reduction Requirements)

The gel coat and resin spray booths (Booth 1 and Booth 2) are subject to the provisions of 326 IAC 8-1-6 since they were constructed after January 1, 1980, and have potential VOC emissions greater than 25 tons per year. Pursuant to CP-039-4651-00336, issued October 24, 1996, the Best Available Control Technology (BACT) for the gel coat and resin spray booths (Booth 1 and Booth 2) has been determined to be use of the as-installed airless and air-assisted airless spray applicators, and a total VOC usage limitation for the gel coat and resin spray booths of 7.06 tons per month (84.7 tons per year). Potential VOC emissions from the two (2) spray booths (83.8 tons per year) are less than the BACT allowable (84.7 tons per year), therefore, the booths will comply with 326 IAC 8-1-6.

No other 326 IAC 8 rules apply.

Compliance Requirements

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

Compliance Determination Requirements in permit Section D are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in permit Section D. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

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

The gel coat and resin spray booths have applicable compliance monitoring conditions as specified below:

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, daily observations shall be made of the overspray while one or more of the booths are in operation.
- (b) Weekly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an overspray emission, evidence of overspray emission, or other abnormal emission is observed.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary to ensure compliance with 326 IAC 8-1-6 (New Facilities; General Reduction Requirements) and 326 IAC 2-7 (Part 70). Also, the dry filters for the gel coat and resin spray booths (Booth 1 and Booth 2) must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

The plastic grinding operation has applicable compliance monitoring conditions as specified below:

- (a) Daily visible emissions notations of the plastic grinding operation baghouse stack exhaust shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.
- (b) An inspection shall be performed each calendar quarter of all bags controlling the plastic grinding operation. All defective bags shall be replaced.

Air Toxic Emissions

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

- (a) This source will emit levels of air toxics greater than those that constitute major source applicability according to Section 112 of the Clean Air Act.
- (b) See attached calculations for detailed air toxic calculations (page 2 of 3).
- (c) 326 IAC 2-1-3.4 (New Source Toxics Control)
The gel coat and resin spray booths (Booth 1 and Booth 2) are not subject to 326 IAC 2-1-3.4. This rule applies to new or reconstructed facilities with potential emissions of any single HAP equal to or greater than ten (10) tons per year and potential emissions of a combination of HAPs greater than or equal to twenty-five (25) tons per year. The rule does not apply to facilities that have been permitted before the effective date of this rule (July 27, 1997). Since the gel coat and resin spray booths (Booth 1 and Booth 2) are not new or reconstructed facilities, and have been permitted prior to July 27, 1997, the requirements of 326 IAC 2-1-3.4 do not apply.

Conclusion

The operation of this stationary fiberglass running board manufacturing operation shall be subject to the conditions of the attached proposed **Part 70 Permit No. T039-7889-00336**.

Description of facility: Gel Coat and Resin Spray Booths (Booth 1 and Booth 2)
Max Rating: 10 plastic mold units per hour
Construction Date: 1995
Control Device (if any): dry filters
Stack/Vent ID: S1, S2, S3, and S4

Facility class:

Description:

EMISSION LIMITATIONS			
Numerical Emission Limit:	VOC: 7.06 tons per month		
Regulation/Citation:	326 IAC 8-1-6		
Compliance Demonstration:	record keeping		
PERFORMANCE TESTING			
	N/A		
Parameter/Pollutant to be Tested:			
Testing Method/Analysis:			
Testing Frequency/Schedule:			
Submittal of Test Results:			
COMPLIANCE MONITORING			
Monitoring Description:	record keeping		
Monitoring Method:			
Monitoring Regulation/Citation:			
Monitoring Frequency:			
RECORD KEEPING			
Parameter/Pollutant to be Recorded:	VOC usage per month		

Premier Fiberglass
 Elkhart, Indiana
 Permit Reviewer: TE/EVP

Description of facility: Plastic Grinding Area (V9)
Max Rating: 218 pounds per hour
Construction Date: 1995
Control Device (if any): baghouse
Stack/Vent ID: S5

Facility class:

Description:

EMISSION LIMITATIONS			
Numerical Emission Limit:	PM: 0.93 pounds per hour		
Regulation/Citation:	326 IAC 6-3-2		
Compliance Demonstration:	inspections and visible emissions		
PERFORMANCE TESTING			
	N/A		
Parameter/Pollutant to be Tested:			
Testing Method/Analysis:			
Testing Frequency/Schedule:			
Submittal of Test Results:			
COMPLIANCE MONITORING			
Monitoring Description:	quarterly inspection of all bags controlling operation, replacement of all defective bags, and daily normal visibility		
Monitoring Method:	inspection and observations by trained personnel		
Monitoring Regulation/Citation:	326 IAC 6-3-2		

Premier Fiberglass
Elkhart, Indiana
Permit Reviewer: IE/EVP

Indiana Department of Environmental Management Office of Air Management

Addendum to the Technical Support Document for a Part 70 Operation

Source Name: Premier Fiberglass
Source Location: 55080 Philips Street, Elkhart, Indiana 46514
County: Elkhart
SIC Code: 3792
Operation Permit No.: T039-7889-00336
Permit Reviewer: Trish Earls/EVP

On November 12, 1997, the Office of Air Management (OAM) had a meeting with Premier Fiberglass in Elkhart, Indiana, stating that Premier Fiberglass had applied for a permit to operate a fiberglass running board manufacturing operation. The notice of intent to issue a permit for this operation and provided information on how to obtain a copy of the proposed permit and other documentation. Finally, the notice informed interested parties of a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

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

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

SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management.

Premier Fiberglass
Elkhart, Indiana
Permit Reviewer: IE/EVP

- (b) This prohibition shall not apply to alleged violations of applicable rules if the Commissioner has granted a permit shield in accordance with 326 IAC 2-7-15, **as set out in this permit in the Section B.8 Permit Shield.**”
- 4. Condition B.8 (c) (Duty to Supplement Information) has been revised to allow the Permittee may assert a claim that records are confidential information:
 - (c) Upon request, the Permittee shall also furnish to IDEM, OAM and EPA records to be kept by this permit. **If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, For information claimed confidential the Permittee **must shall** furnish such records to IDEM, OAM and EPA to maintain confidentiality under 326 IAC 17. If requested by IDEM, OAM and EPA, the Permittee **must shall** furnish copies of requested records directly to U. S. EPA. If the Permittee **making a claim of confidentiality regarding the furnished records**, the Permittee **must shall** furnish such confidential records directly to U. S. EPA with a claim of confidentiality under 40 CFR 2, Subpart B.**
- 5. Section B.11 (c) (Annual Compliance Certification) has been revised to align with federal Part 70 rules. The language in (c)(3) has been revised since it was a clarification rather than a change in the requirement. The language in (c)(4) will clarify the treatment of insignificant activities. OAM is revising the new rule 007 NPD to provide more guidance regarding the annual compliance certification for sources with Title V permits:
 - (c) The annual compliance certification report shall include the following:
 - (1) The identification of each term or condition of this permit included in the certification;
 - (2) The compliance status;
 - (3) Whether compliance was **based on** continuous or intermittent monitoring;
 - (4) The methods used for determining compliance of the permittee.

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

-
- (a) If required by specific condition(s) in Section D of this permit and maintain Preventive Maintenance Plans (PMP) within n of this permit, including the following information on each fa
- (1) Identification of the individual(s) responsible for inspecting and repairing emission units and associated emission co
 - (2) A description of the items or conditions that will be inspected and the schedule for said items or conditions;
 - (3) Identification and quantification of the replacement parts kept in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be completed within the above time frame, the Permittee may extend the date by 30 days provided the Permittee notifies:

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

- (b) The Permittee shall implement the Preventive Maintenance Plan such that lack of proper maintenance does not cause or contribute to a limitation on emissions or potential to emit.
 - (c) PMP's shall be submitted to IDEM, OAM upon request and for review and approval by IDEM, OAM.
7. Condition B.14 (Permit Shield) condition has been revised to clarify applicable requirements from previous permits and how the permittee can state that a specific requirement is not applicable to the source.

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- (2) IDEM, OAM, in acting on the Part 70 permit application in writing that other requirements specifically identified in the permit application, and the Part 70 permit includes the determination thereof. The permit contains an explicit determination summary of a determination that other specific requirements are not applicable.
- ~~(b)~~ (c) No permit shield shall apply to any permit term or condition of issuance of this permit to have been based on erroneous information in the permit application. If, after issuance of this permit, it is determined that the permittee is in nonconformance with an applicable requirement of the permit on the date of permit issuance, including any term or condition of any issued construction or operation permit, IDEM, OAM shall require the permittee to reopen and revise this permit and issue a compliance order to ensure expeditious compliance with the applicable requirements. The permit shall be reissued. The permit shield shall continue in effect so long as the permittee is in compliance with the compliance order.
- ~~(c)~~ (d) If, after issuance of this permit, it is determined that the permittee is in nonconformance with an applicable requirement, IDEM, OAM, shall immediately require the permittee to revise this permit and issue a compliance order to the Permittee to ensure compliance with the applicable requirement until the permittee is in compliance with the compliance order. No permit shield shall apply to any permit term or condition of issuance of this permit to have been based on erroneous information supplied in the permit application.
- ~~(d)~~ (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect:
- (1) The provisions of Section 303 of the Clean Air Act (CAA) and the authority of the U.S. EPA under Section 303 of the CAA;
 - (2) The liability of the Permittee for any violation of applicable requirements at the time of this permit's issuance;

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8. Condition B.16 (Deviations from Permit Requirements and Conditions) shall be revised to include the deviation terminology that had been contained in Section C, in the Permit Requirements condition:

B.16 **Deviations from Permit Requirements and Conditions** [326 IAC 2-7-1(12)]

- (a)** **Deviations from any permit requirements (for emergencies and other special Provisions), the probable cause of such deviations, and any corrective measures taken shall be reported to:**

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Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
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within ten (10) calendar days from the date of the discovery of the deviation.

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

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

A Permittee's failure to take the appropriate response to a deviation when a compliance monitoring parameter has occurred is a violation of this permit.

- (b) (c)** **Written notification shall be submitted on the attached Emergency Response Plan form.**

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

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

- ~~(a) The Permittee must comply with the requirements of 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify the permit.~~
- (b) Any application requesting an amendment or modification of the permit shall be submitted to:

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

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

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

11. Condition B.26 (now renumbered B.24) (Inspection and Entry) has been amended to require a requirement for an IDEM identification card, which other agencies do not require.

B.26 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of ~~IDEM~~ **proper** identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM, U.S. EPA, or other authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or where emissions related activity is conducted, or where records may be maintained, for the purpose of inspecting, testing, or monitoring the source.

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- (1) **The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the permit file, OAM, or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be asserted before or at the time the information is removed from the permit file. In the event that a claim of confidentiality is so asserted, the Permittee, or an authorized representative, may disclose the information until IDEM, OAM, makes a determination under IC 17-1-9 that the information is not entitled to confidentiality. That determination becomes final. [IC 5-14-3-4; 326 IAC 17-1-7 through 326 IAC 17-1-9]**
 - (2) **The Permittee, and IDEM, OAM, acknowledge their responsibility to respond to claims of confidentiality made by the Permittee regarding information removed or about to be removed from the permit file. [40 CFR Part 2, Subpart B]**
 12. Condition B.27 (b)(now re-numbered B.25) (Transfer of Ownership of Permit) has been revised to clarify that this notification does not require a certification by the Permittee.
 - (b) The written notification shall be sufficient to transfer the permit without an administrative amendment pursuant to 326 IAC 2-7-11. **The notification to be submitted by the Permittee does not require the certification of a "responsible official" as defined by 326 IAC 2-7-1(34).**
 13. Condition B.28 (now renumbered B.26) (Annual Fee Payment) has been revised to clarify the Permittee's responsibility for the timely payment of annual fees.
- B.28 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 ten (10) business days of receipt of a billing, or in a time period consistent with the fee schedule in 326 IAC 2-7-19. If the Permittee does not receive a bill from IDEM, OAM, the fee is due April 1 of each year.~~
 - (b) Failure to pay may result in administrative enforcement action.

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

15. Condition C.2 (Particulate Matter Emission Limitations For Processes with PM Less Than One Hundred (100) pounds per hour) is a new condition added to address the PM emission limitation for facilities below 100 pounds per hour.

C.2 Particulate Matter Emission Limitations For Processes with PM 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 for a process not already regulated by 326 IAC 6-1 or any New Source Review process and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.~~

16. Condition C.2 (now renumbered as C.3) (Opacity) has been revised.

C.3 Opacity [326 IAC 5-1]
~~Pursuant to 326 IAC 5-1-2 (Visible Emissions Opacity Limitations), 326 IAC 5-1-3 (Temporary Exemptions), visible emissions opacity shall not exceed the opacity otherwise stated in this permit:~~

- (a) Visible Emissions Opacity shall not exceed an average of ~~four (4) percent~~ **any one (1) six (6) minute averaging period in twenty-four (24) hours** as determined in 326 IAC 5-1-4.

- (b) Visible Emissions Opacity shall not exceed sixty percent (60%) of the cumulative total of fifteen (15) minutes (sixty (60) readings at a minimum) as determined in **40 CFR 60, Appendix A, Method 9, or fifteen (15) one (1) hour integrated averages for a continuous opacity monitor**, as determined in 326 IAC 5-1-4.

17. Condition C.6 (now renumbered C.7) (Operation of Equipment) has been revised.

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

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [401 IAC 1-10]

-
- (a) **Notification requirements apply to each owner or operator of a facility where the amount of regulated asbestos containing material (RACM) to be removed or disturbed is at least 260 linear feet on pipes and other facility components, or at least thirty-five (35) cubic feet on other facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification regardless of the amount of RACM present.**
- (b) **The Permittee shall ensure that a written notification is submitted to the Commissioner at least ten (10) working days before the start of removal work or before demolition begins, per 326 IAC 14-10-3(2), and such notice as necessary, including, but not limited to:**
- (1) **When the amount of affected asbestos containing material (ACM) to be removed or disturbed 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 and delivered to the Commissioner to the guidelines set forth in 326 IAC 14-10-3(2).**
- (d) **The notice to be submitted shall include the information set forth in 326 IAC 14-10-3(3).**

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(e) Procedures for Asbestos Emission Control

The Permittee shall comply with the emission control provisions of 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emissions control measures are mandatory for any removal or disturbance of RACM. This includes 100 linear feet on pipes or three (3) square feet on any other surface, 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 permit operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is enforceable.

19. Condition C.8 (now re-numbered C.9) (Performance Testing) is revised to add a notification requirement, and clarify that any submittal under this condition requires a certification by a responsible official:

C.8 Performance Testing [~~326 IAC 3-2.1~~] [326 IAC 3-6]

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

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

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100 North Senate Avenue, P. O. Box 6015
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no later than thirty-five (35) days **before prior to** the intended test date. The Permittee shall submit a notice of the actual test date to the above address **received at least two weeks prior to the test date.**

- (b) All test reports must be received by IDEM, OAM within forty-five (45) days of the test date.**

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

21. Condition C.10 (now re-numbered C.11) (Compliance Monitoring) has been granted a one time extension of the time to install and initiate any required monitoring equipment.

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

~~Compliance with applicable requirements shall be documented as required by 326 IAC 2-7-6(1). The Permittee shall be responsible for installing any necessary equipment and monitoring related to that equipment, no more than ninety (90) days after receipt of this permit. If, due to circumstances beyond its control, this schedule cannot be met, the Permittee shall **extend compliance schedule an additional ninety (90) days prior to the end of the initial ninety (90) day compliance schedule** and notify the Department in writing, prior to the end of the initial ninety (90) day compliance schedule, of the reasons for the delay and a schedule which it expects to meet. If a denial of the permit is issued before the monitoring is fully implemented, the schedule shall be determined by the Department.~~

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in writing, **prior to the end of the initial ninety (90) day compliance schedule** ninety (90) days after receipt of this permit, with full justification of the reasons for the delay and a schedule which it expects to meet. and a schedule which it expects to meet. If a denial of the permit is issued before the monitoring is fully implemented, the schedule shall be determined by the Department.

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

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(a) The Permittee shall prepare written emergency reduction plan and safe operating procedures.

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

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Compliance Branch, Office of Air Management
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within ninety (90) days after the date of issuance of this permit.

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

(c) If the ERP is disapproved by IDEM, OAM, the Permittee shall have (30) days to resolve the differences and submit an approvable ERP. Permittee does not submit an approvable ERP, then IDEM, OAM will disapprove the plan.

(d) These ERPs shall state those actions that will be taken, when declared, to reduce or eliminate emissions of the appropriate pollutant.

(e) Said ERPs shall also identify the sources of air pollutants, the method of reduction of the pollutants, and a brief description of the maximum reduction that will be achieved.

(f) Upon direct notification by IDEM, OAM, that a specific air pollution episode is in effect, the Permittee shall immediately put into effect the actions specified in the approved ERP for the appropriate episode level. [326 IAC 1-2-1-1]

24. Condition C.14 (Risk Management Plan) has been revised to more closely match the language of 40 CFR 68 and clarify that any submittal under this condition shall be signed by a responsible official.

C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

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- (b) Provide annual certification to IDEM, OAM, that the Risk Management Plan is properly implemented.

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

- 25. Condition C.15 (Compliance Monitoring Plan-Failure to Take Response Steps) shall add the following rule cites were changed and added to the title, as follows:

C.15 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-6] [326 IAC 1-6]

- 26. Condition C.16 (Actions Related to Noncompliance Demonstrated by a Stack Test) shall add the following rule cites to the title, and clarify that any submittal shall require a certification by a responsible official.

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with the requirements of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall provide a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to reduce emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions are not sufficient. The Permittee shall submit a description of additional corrective actions to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM shall have the authority to use enforcement activities to resolve noncompliance.

- (b) A retest to demonstrate compliance shall be performed within thirty (30) days of receipt of the original test results. Should the Permittee fail to complete the retest, IDEM, OAM shall have the authority to extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for revocation of the permit to operate the affected facility.

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28. Condition C.19 (General Record Keeping) is revised to add the following and change the requirements for keeping records, making records available, and responding to more closely match the rule language as follows:

C.19 General Record Keeping Requirements [326 IAC 2-7-5(3)(B)]~~[326~~

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

29. Condition C.20 (General Reporting Requirements) is revised to clarify compliance monitoring reports and clarify that any submittal under this condition requires a certification by a responsible official. The deviation terminology was changed to a condition titled Deviations from Permit Requirements and Conditions.

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

~~(a) To affirm that the source has met all the **compliance monitoring** requirements of this permit the source shall submit a Quarterly Compliance Report. In the event of a deviation from the requirements and the date(s) of each deviation.~~

(b) The report required in (a) of this condition and reports required by other conditions of this permit shall be submitted to:

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

(c) Unless otherwise specified in this permit, any notice, report, or

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

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

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

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

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

(g) The first report shall cover the period commencing on the date of the deviation and ending on the last day of the reporting period.

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

30. The facility description box in all D sections is revised to include the

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

31. The Certification Form is revised to clarify which forms require a certification and which do not. The revised form is shown on the next page.

32. The Emergency/Deviation Occurrence Reporting Form is revised to include a certification requirement. The revised form is shown on pages 17 and 18 below.

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

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Premier Fiberglass
Source Address: 55080 Philips Street, Elkhart, Indiana 46514
Mailing Address: 55080 Philips Street, Elkhart, Indiana 46514
Part 70 Permit No.: T039-7889-00336

**This certification shall be included when submitting monitoring,
or other documents as required by this permit.**

Please check what document is being certified:

Annual Compliance Certification Letter

Emergency/Deviation Occurrence Reporting Form

Test Result (specify) _____

Report (specify) _____

Notification (specify) _____

Other (specify) _____

I certify that, based on information and belief formed after reasonable

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

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

Source Name: Premier Fiberglass
Source Address: 55080 Philips Street, Elkhart, Indiana 46514
Mailing Address: 55080 Philips Street, Elkhart, Indiana 46514
Part 70 Permit No.: T039-7889-00336

This form consists of 2 pages

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

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

Facility/Equipment/Operation:

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

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/devia Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:

If applicable, describe the reasons why continued operation of the facilities imminent injury to persons, severe damage to equipment, substantial loss loss of product or raw materials of substantial economic value:

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

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

Source Name: Premier Fiberglass
Source Address: 55080 Philips Street, Elkhart, Indiana 46514
Mailing Address: 55080 Philips Street, Elkhart, Indiana 46514
Part 70 Permit No.: T039-7889-00336

Months: _____ **to** _____ **Year:** _____

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

NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD. LIST THE COMPLIANCE REQUIREMENT EXISTING FOR THIS SOURCE:

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

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34. The new AP-42 emission factors, based on the "CFA Emission Model for Plastics Industries", February, 1998, were used for the resin and gel coat. Instead of using a flash off factor based on the type of resin or gel coat, the emission factors are determined based on the weight percent of styrene monomer in the gel coat. The emission factor represents the weight percent of resin styrene (which is a VOC and a HAP). The new emission factors result in potential VOC and HAP emissions from the fiberglass layup operations. The calculation spreadsheets have been revised to incorporate the new factors with the BACT determination per CP-039-4651-00336, issued October 1998. As a VOC emission limit for the gel coat and resin spray booths, the solvent usage limitation on coating and solvent usage in the gel coat and resin spray booths. VOC emissions are limited to 84.7 tons per year. Therefore, part (b) of the Part 70 Operating permit, has been revised as follows (new language in strikeout):

(b) The total emissions of volatile organic compounds (VOC) from the resin spray booths (Booth 1 and Booth 2) shall be limited to 7.06 tons per year. ~~35% flash off for non vapor suppressed (NVS) gel coat spray booths and 32.62% NVS resin spray layup.~~ **a maximum of 14.3% by weight of styrene monomer and a maximum of 32.62% styrene monomer) usage being emitted and 9.1% by weight of the resin (containing a maximum of 14.3% styrene monomer) usage being emitted.**

A Quarterly Report form has been added to the Part 70 Operating Permit to ensure compliance with the VOC limit in Condition D.1.1.

35. The Limited Potential to Emit section of the TSD, page 4 of 10, has been revised to show the revised emissions from the fiberglass layup operations. The table shows the emission calculations from Natural Gas combustion due to new AP-42 factors published in March, 1998. The table is revised as follows (changes in bold):

Limited Potential to Emit

The table below summarizes the total potential to emit, **reflecting a maximum of 84.7 tons per year of VOC emissions** in emission units.

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36. Due to the revised potential emissions from the fiberglass layup operation, the State Rule Applicability - Individual Facilities section of the TSD, page 7 of 10, applicability of 326 IAC 8-1-6 has been revised to include the revised language. This section now reads as follows (deleted language in strikeout, new language in bold):

326 IAC 8-1-6 (New Facilities, General Reduction Requirements)

The gel coat and resin spray booths (Booth 1 and Booth 2) are subject to the provisions of 326 IAC 8-1-6 since they were constructed after January 1, 1996. Pursuant to 326 IAC 8-1-6, VOC emissions greater than 25 tons per year. Pursuant to 326 IAC 8-1-6, on October 24, 1996, the Best Available Control Technology (BACT) for the resin spray booths (Booth 1 and Booth 2) has been determined to be the installation of airless and air-assisted airless spray applicators, and a limitation for the gel coat and resin spray booths of 7.06 tons per month (84.7 tons per year). Potential VOC emissions from the two (2) spray booths are ~~less~~ **greater** than the BACT allowable (84.7 tons per year). ~~comply with 326 IAC 8-1-6~~ **the source has accepted a maximum of 14.3% by weight of the gel coat and 32.62% styrene monomer coating and solvent usage in the gel coat and resin spray booths. VOC emissions are limited to 7.06 tons per month (84.7 tons per year). The gel coat and resin spray booths will be in compliance with 326 IAC 8-1-6.**

37. The gel coat and resin spray booths compliance monitoring requirements in the Compliance Monitoring section of the TSD, page 7 of 10, have also been revised to include a new limit and the quarterly reporting requirement to document compliance. The revised compliance monitoring requirements for the gel coat and resin spray booths are as follows (changes in bold):

The gel coat and resin spray booths have applicable compliance monitoring requirements specified below:

- (a) **The total emissions of volatile organic compounds (VOC) from the gel coat and resin spray booths (Booth 1 and Booth 2) shall be limited to 7.06 tons per month based on a maximum of 14.3% by weight of the gel coat and 32.62% styrene monomer usage being emitted and 37.9% styrene monomer by weight of the resin (containing a maximum of 37.9% styrene monomer) being emitted.**

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These monitoring conditions are necessary to ensure compliance with (Part 70 Operating Permits; General Reduction Requirements) and 326 IAC 2-7 (Part 70 Operating Permits; General Reduction Requirements) and 326 IAC 2-7 (Part 70 Operating Permits; General Reduction Requirements) the gel coat and resin spray booths (Booth 1 and Booth 2) must operate in compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70 Operating Permits; General Reduction Requirements).

38. A Reporting Requirements condition has been added to section D of the new permit as Condition D.1.10 and reads as follows:

D.1.10 Reporting Requirements

A quarterly summary of the information to document compliance with this permit shall be submitted to the address listed in Section C - General Reporting Requirements using the reporting forms located at the end of this permit, or their equivalent, within 15 days after the end of the quarter being reported.

39. Condition D.1.4 (Testing Requirements) of the Part 70 Operating Permit shall be revised in the new permit model changes as follows (changes in bold):

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

The Permittee is not required to test this facility by this permit. The Permittee shall not require compliance testing at any specific time when necessary. Compliance testing at this facility is in compliance. If testing is required by IDEM, compliance testing shall be specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

40. Two (2) new conditions related to the VOC usage limitation in Condition D.1.1 shall be added to section D.1 of the Part 70 Operating Permit. The conditions read as follows:

D.1.5 Volatile Organic Compounds (VOC)

Compliance with the VOC usage limitation contained in Condition D.1.1 shall be demonstrated pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulae provided by the coating manufacturer. IDEM, OAM reserves the authority to determine compliance with 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) in conjunction with the analytical procedures specified in 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a).

D.1.6 VOC Emissions

Compliance with Condition D.1.1 shall be demonstrated at the end of the reporting period.

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D.1.8 Monitoring

- (a) Daily inspections shall be performed to verify the placement of the filters. To monitor the performance of the dry filters, ~~daily~~ be made of the overspray **from the gel coat and resin surfaces (S1, S2, S3, and S4)** while one or more of the booths are in operation. A Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with the Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) ~~Weekly~~ **Monthly** inspections shall be performed of the coating and the presence of overspray on the rooftops and the near vicinity. The Response Plan for this unit shall contain troubleshooting corrective action steps for when **an a noticeable change in** overspray emissions or an a noticeable change in emission or other abnormal emission is observed. The Compliance Monitoring Plan shall be followed whenever a condition exists which should result in a response step 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 outlined in the Preventive Maintenance Plan.

Part (b) of Condition D.1.7 (now re-numbered as D.1.9) has been re-numbered in monitoring frequency.

- (b) To document compliance with Conditions D.1.5 and D.1.6 ~~D.1.5 and D.1.6~~ Permittee shall maintain a log of ~~daily~~ **weekly** overspray observations and **monthly** inspections, and those additional inspections prescribed in the Preventive Maintenance Plan.

42. Condition D.2.2 (Preventive Maintenance Plan), has been removed from this Permit. Since the plastic grinding area PM emissions are controlled to meet allowable emissions do not exceed 10 pounds per hour, a Preventive Maintenance Plan is not required for this facility. Conditions D.2.3 through D.2.8 have been re-numbered D.2.2 through D.2.7.

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D.2.4 Visible Emissions Notations

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- (a) Daily visible emission notations of the plastic grinding area to be performed during normal daylight operations **when exhaust**. A trained employee shall record whether emissions are normal.

45. Torn or otherwise failed bags can have a dramatic effect on bag house sources have reliable information that demonstrates that compliance compartments are "on line" with torn bags. Condition D.2.7 (now revised) has been revised as follows to clarify that the emergency provisions of the corresponding condition in this permit may take precedence if applicable. Condition D.2.7 revised as follows (changes in bold):

D.2.6 Broken **or Failed** Bag or Failure Detection

In the event that bag failure has been observed.

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

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

Company Name: Premier Fiberglass
Address City IN Zip: 55080 Philips Street, Elkhart, Indiana 46514
Operation Permit No.: T039-7889
Plt ID: 039-00336
Reviewer: Trish Earls/EVP
Date: July 24, 1998

State Potential Emissions (uncontrolled):								
Material (as applied)	Density (Lb/Gal)	Weight % Styrene Monomer or VOC	Emission Factor % of Resin/ Gel Coat Weight	Gal of Mat (gal/unit)	Maximum (unit/hour)	Volume % Non-Vol (solids)	Potential VOC pounds per hour	Potential VOC pounds per day
Gel Coat Spray Booth (Booth #1)								
Grey Primer Gel Coat	12.59	32.62%	14.30%	0.4400	8.00	67.38%	6.34	152.
White Gel Coat	11.68	32.00%	13.70%	0.3200	2.00	50.98%	1.02	24.
Catalyst	9.17	100.00%	N/A	0.0022	10.00	0.00%	0.20	4.
Resin Spray Booth (Booth #2)								
Resin	9.16	37.90%	9.10%	2.8500	10.00	48.70%	23.76	570.
Catalyst	9.17	100.00%	N/A	0.0262	10.00	0.00%	2.40	57.
Other Clean Up Solvents								
SuperFlush	8.86	100.00%	N/A	0.0113	1.00	0.00%	0.10	2.
Super Blue Resin Cleaner	8.76	100.00%	N/A	0.0114	1.00	0.00%	0.10	2.
Total State Potential Emissions:							32.89	789.
Federal Potential Emissions (controlled):								
				Material Usage	Control Efficiency:	Controlled	Controlled	

**Appendix A: Emission Calculations
HAP Emissions - Potential to Emit**

Company Name: Premier Fiberglass
Address City IN Zip: 55080 Philips Street, Elkhart, Indiana 46514
Operation Permit No.: T039-7889
Pit ID: 039-00336
Reviewer: Trish Earls/EVP
Date: July 24, 1998

Potential To Emit								
Material	Density (lb/gal)	Gal of Mat (gal/unit)	Maximum Production (unit/hr)	Emission Factor	Weight % Styrene	Weight % Dimethyl phthalate	Weight % Methyl Ethyl Ketone	Weight % Glycol Ethers
Gel Coat Spray Booth (Booth #1)								
Grey Primer Gel Coat	12.59	0.4400	8.00	14.30%	32.62%	0.00%	0.00%	0.00%
White Gel Coat	11.68	0.3200	2.00	13.70%	32.00%	0.00%	0.00%	0.00%
Catalyst	9.17	0.0022	10.00	N/A	0.00%	52.00%	2.00%	0.00%
Resin Spray Booth (Booth #2)								
Resin	9.16	2.8500	10.00	9.10%	37.90%	0.00%	0.00%	0.00%
Catalyst	9.17	0.0262	10.00	N/A	0.00%	52.00%	2.00%	0.00%
Clean Up Solvents								
Super Flush	8.86	0.0113	1.00	N/A	0.00%	0.00%	0.00%	0.00%
Super Blue Resin Cleaner	8.76	0.0114	1.00	N/A	0.00%	0.00%	0.00%	10.00%

Methodology:

Styrene emission rate (tons/yr) = density (lb/gal) * (gal/unit) * (units/hour) * Emission Factor * Material Usage Limitation * (8,760 hrs/yr) * (1 ton/2,000 lb)
HAPs emission rate (tons/yr) = density (lb/gal) * (gal/unit) * (units/hour) * weight % HAP * Material Usage Limitation * (8,760 hrs/yr) * (1 ton/2,000 lb)

**Appendix A: Emission Calculations
Natural Gas Combustion
MM Btu/hr < 100**

Company Name: Premier Fiberglass
Address City IN Zip: 55080 Philips Street, Elkhart
Operation Permit No.: T039-7889
Plt ID: 039-00336
Reviewer: Trish Earls/EVP
Date: July 24, 1998

Heat Input Capacity
MMBtu/hr

3.15

Potential Throughput
MMCF/yr

27.6

Heat Input Capacity includes:

four (4) radiant heaters, each rated at 0.6 MMBtu per hour and one (1) air make-up unit, rated at 0.75 MMBtu per hour

	Pollutant			
	PM	PM10	SO2	NOx
Emission Factor in lb/MMCF	7.6	7.6	0.6	100
Potential Emission in tons/yr	0.10	0.10	0.01	1.3