

**FEDERALLY ENFORCEABLE STATE  
OPERATING PERMIT (FESOP)  
and ENHANCED NEW SOURCE REVIEW  
OFFICE OF AIR MANAGEMENT**

**Hy-Tec Fiberglass, Inc.  
2204 Suppliers Court  
Fort Wayne, Indiana 46818**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the facilities listed 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 2-8 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 (prior to July 1, 1996, IC 13-1-1-4 and IC 13-7-10).

Operation Permit No.: F003-8074-00170	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

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## SECTION A SOURCE SUMMARY

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

### A.1 General Information [326 IAC 2-8-3(b)]

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The Permittee owns and operates a reinforced plastic products manufacturing plant.

Responsible Official: Richard M. Witzigreuter  
Source Address: 2204 Suppliers Court, Fort Wayne, Indiana 46818  
Mailing Address: 2204 Suppliers Court, Fort Wayne, Indiana 46818  
SIC Code: 3089  
County Location: Allen County  
County Status: Attainment for all criteria pollutants  
Source Status: Federally Enforceable State Operating Permit (FESOP)  
Minor Source, under PSD Rules;  
Minor Source, Section 112 of the Clean Air Act

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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

- (a) one (1) boom hand lay-up area (Zone 1) which employs six (6) hand lay-up stations. This area exhausts through vent V7. This area does not have any air pollution control devices;
- (b) one (1) bucket and small parts hand lay-up area (Zone 6) which employs one (1) lay-up station. This area exhausts through vents V2 and V3. This area does not have any air pollution control devices; and
- (c) one (1) gel coat spray lay-up area (Zone 5a) which employs one (1) gel coat booth. This area utilizes air-assisted airless spray guns and exhausts through vent V1. This area also utilizes dry filters for particulate control.
- (d) one (1) boom priming area (Zone 5c) which employs one (1) spray booth. This area utilizes HVLP spray guns and exhausts through vents V4 and V5. This area also utilizes dry filters for particulate control.

### A.3 Insignificant Activities [326 IAC 2-7-1(20)] [326 IAC 2-8-3(c)(3)(I)]

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This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(20):

- (a) one (1) boom painting area (Zones 5B) which employs one (1) spray booth. This area utilizes HVLP spray guns and exhausts through vents V2 and V3. This area also utilizes dry filters for particulate control. The fabric filters do not need to be operated at all times, but only at the source's discretion. This insignificant activity has applicable requirements in section D.3 of this permit;
- (b) natural gas-fired combustion units with heat input equal to or less than ten million (10,000,000) Btu per hour;
- (c) application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings;
- (d) water based adhesives that are less than or equal to 5 percent by volume of volatile organic compounds (VOCs) excluding hazardous air pollutants (HAPs);

- (e) trimmers that do not produce fugitive emissions and that are equipped with a dust collection system or trim material recovery device such as a bag filter or cyclone;
- (f) on-site fire and emergency response training approved by the department;
- (g) grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors, and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking operations. This insignificant activity has applicable requirements in section D.3 of this permit; and
- (h) mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals measured at 38 degrees Celsius).

A.4 FESOP Applicability [326 IAC 2-8-2]

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This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) for a Federally Enforceable State Operating Permit (FESOP).

## **SECTION B GENERAL CONDITIONS**

### **B.1 General Requirements [IC 13-15] [IC 13-17] (Prior to July 1, 1996: IC 13-7 and IC 13-1-1)**

The Permittee shall comply with the provisions of IC 13-15 (Permits Generally), IC 13-17 (Air Pollution Control) and the rules promulgated thereunder.

### **B.2 Definitions [326 IAC 2-8-1]**

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 (prior to July 1, 1996, IC 13-7-1, IC 13-1-1-2), 326 IAC 1-2, and 326 IAC 2-7 shall prevail.

### **B.3 Permit Term [326 IAC 2-8-4(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 2-8-6]**

- (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 2-8-9] [326 IAC 2-8-3(h)]**

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 2-8-3(h) and 326 IAC 2-8-9.

### **B.6 Severability [326 IAC 2-8-4(4)] [326 IAC 2-8-7(a)(3)]**

- (a) The provisions of this permit are severable, and if any provisions of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.
- (b) Indiana 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 FESOP under 326 IAC 2-8.

### **B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(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 2-8-3(f)] [326 IAC 2-8-4(5)(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, 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. For information claimed to be confidential, the Permittee shall furnish such records directly to the U.S. EPA and IDEM, OAM, along with a claim of confidentiality.

Such confidentiality claims shall meet the requirements of 40 CFR 2, Subpart B (when submitting to U.S. EPA) and 326 IAC 17 (when submitting to IDEM, OAM).

**B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]**

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IDEM, OAM, may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

**B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]**

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- (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; and
  - (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.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)]**

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- (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) This certification shall be submitted on the attached Certification Form.
- (c) A responsible official is defined at 326 IAC 2-7-1(33).

**B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]**

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- (a) The Permittee shall annually certify that this source has complied with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall be submitted in letter form no later than July 1 of each year to:

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

- (b) This annual compliance certification report required by this permit shall be timely if delivered by any method and received and stamped by IDEM, OAM, on or before the date it is due. [326 IAC 2-5-3]

- (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 continuous or intermittent;
  - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
  - (5) Such other facts as IDEM, OAM, may require to determine the compliance status of the source, as specified in Sections D of this permit.
- (d) The Permittee shall also annually certify that this source is in compliance with additional requirements as may be specified under Sections 114(a)(3) and 504(b) of the Clean Air Act.

**B.13 Preventive Maintenance Plan [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)] [326 IAC 1-6-3]**

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- (a) The Permittee shall prepare, maintain and implement Preventive Maintenance Plans within ninety (90) days after the issuance of this permit, including the following information on each:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission units and 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) Corrective actions that will be implemented in the event an inspection indicates an out of specification situation;
  - (4) A time schedule for taking such corrective actions including a schedule for devising additional corrective actions for situations that may not have been predicted; and
  - (5) Identification and quantification of the replacement parts which will be maintained in inventory for quick replacement.
- (b) Preventive Maintenance Plans shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM.

**B.14 Emergency Provisions [326 IAC 2-8-12]**

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- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.
- (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 describes 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 of this permit;
- (4) For each emergency lasting longer than one (1) hour, the Permittee notified IDEM, OAM, within four (4) daytime business hours by telephone or facsimile after the beginning of the emergency, or after the emergency is discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Management, Compliance Section) or,

Telephone No.: 317-233-5674 (ask for Compliance Section)

Facsimile No.: 317-233-5967

Failure to notify IDEM, OAM, by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency, or after the emergency is discovered or reasonably should have been discovered, shall constitute a violation of 326 IAC 2-8 and any other applicable rules. [326 IAC 2-8-12(f)]

- (5) For each emergency lasting longer than one (1) hour, the Permittee submitted written notice 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 2-8-4(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.
- (6) The Permittee immediately took all reasonable steps to correct the emergency.

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(33).

- (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 any emergency or upset provision contained in 326 IAC 1-6 (Malfunctions). 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 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAM, by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency, or after the emergency is discovered or reasonably should have been discovered, shall constitute a violation of 326 IAC 2-8 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 material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in 326 IAC 2-8-12(g)(2)(B).

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any corrective actions 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) Written notification shall be submitted on the attached Deviation Occurrence Reporting Form or its substantial equivalent.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination  
[326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

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- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP 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 2-8-4(5)(C)]
  - (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 (prior to July 1, 1996, in IC 13-7-10-5) 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 2-8-8(a)]
  - (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 2-8-8(b)]
  - (d) The reopening and revision of this permit, under 326 IAC 2-8-8(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 2-8-8(c)]

**B.17 Permit Renewal [326 IAC 2-8-3(h)]**

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- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, and shall include, at minimum, the information specified in 326 IAC 2-8-3. 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(20).

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, IN 46206-6015
- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]
  - (1) The Permittee has a duty to submit a timely and complete permit renewal application. 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) Delivered by any method and received and stamped 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 until the renewal permit has been issued or denied.
- (c) **Right to Operate After Application for Renewal [326 IAC 2-8-9]**  
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 2-8 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 needed to process the application.

**B.18 Administrative Permit Amendment [326 IAC 2-8-10]**

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- (a) An administrative permit amendment is a FESOP revision that makes changes of the type specified under 326 IAC 2-8-10(a).
- (b) An administrative permit amendment may be made by IDEM, OAM, consistent with the procedures specified under 326 IAC 2-8-10(b).
- (c) The Permittee may implement the changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

**B.19 Minor Permit Modification [326 IAC 2-8-11(a)] [326 IAC 2-8-11(b)(1) and (2)]**

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- (a) A permit modification is any revision to this permit that cannot be accomplished under administrative permit amendment under 326 IAC 2-8-10.
- (b) Minor permit modification of this permit shall follow the procedures specified under 326 IAC 2-8-11(b)(1)(A) through (F).
- (c) An application requesting the use of minor modification procedures shall meet the requirements of 326 IAC 2-8-3(c) and shall include the information required in 326 IAC 2-8-11(b)(3)(A) through (D).
- (d) The Permittee may make the change proposed in its minor permit modification application immediately after it files such application unless the change is subject to the construction permit requirements of 326 IAC 2-1, 326 IAC 2-2, or 326 IAC 2-3. After the Permittee makes the change allowed under minor permit modification procedures, and until IDEM, OAM, takes any of the actions specified in 326 IAC 2-8-11(b)(5), the Permittee must comply with both the applicable requirements governing the change and the proposed permit terms and conditions. During this period, the Permittee need not comply with the existing permit terms and conditions it seeks to modify. If the Permittee fails to comply with its proposed permit terms and conditions during this time period, the existing permit terms and conditions it seeks to modify may be enforced against it. [326 IAC 2-8-11(b)(6)]

**B.20 Significant Permit Modification [326 IAC 2-8-11(d)]**

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- (a) Significant modification procedures shall be used for applications requesting permit modifications that do not qualify as minor permit modifications or as administrative amendments.
- (b) Any significant change in existing monitoring permit terms or conditions and every

relaxation of reporting or record keeping permit terms or conditions of this permit shall be considered significant.

- (c) Nothing in 326 IAC 2-8-11(d) shall be construed to preclude the Permittee from making changes consistent with 326 IAC 2-8 that would render existing permit compliance terms and conditions irrelevant.
- (d) Significant modifications of this permit shall meet all requirements of 326 IAC 2-8, including those for application, public participation, and review by U.S. EPA, as they apply to permit issuance and renewal.

B.21 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-8-11(b)]

Notwithstanding 326 IAC 2-8-11(b)(1)(D)(i) and 326 IAC 2-8-11(c)(1), minor permit modification procedures may be used for modifications of this permit involving the use of economic incentives, marketable permits, emissions trading, and other similar approaches to the extent that such minor permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated by U.S. EPA.

B.22 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-8-15(b)]

The Permittee may make Section 502(b)(10) of the Clean Air Act changes without a permit revision, subject to the constraint of 326 IAC 2-8-15(a) and the following additional condition:

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.23 Operational Flexibility [326 IAC 2-8-15]

(a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without 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 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAM, in the notices specified in 326 IAC 2-8-15(b)(1), (c)(1), and (d).

- (b) For each such 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(33).

- (c) Emission Trades [326 IAC 2-8-15(c)]  
The Permittee may trade increases and decreases in emissions in the source, where the applicable State Implementation Plan (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 2-8-15(c).
- (d) Alternative Operating Scenarios [326 IAC 2-8-15(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 2-8-4(7) and subject to the constraints in Section (a) of this condition and those in 326 IAC 2-8-15(d).
- (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.24 Construction Permit Requirement [326 IAC 2]**

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Modification, construction, or reconstruction shall be permitted as required by and in accordance with 326 IAC 2.

**B.25 Inspection and Entry [326 IAC 2-8-5(a)(2)]**

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

- (a) Enter upon the Permittee's premises where a FESOP 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 2-8-5(a)(4)]

**B.26 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-8-10]**

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Pursuant to 326 IAC 2-1-6 and 2-8-10:

- (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 current Permittee and the new owner.
- (b) The written notification shall be sufficient to transfer the permit to the new owner.
- (c) IDEM, OAM, shall reserve the right to issue a new permit.

**B.27 Annual Fee Payment [326 IAC 2-8-4(6)] [326 IAC 2-8-16]**

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- (a) The Permittee shall pay annual fees to IDEM, OAM, consistent with the fee schedule established in 326 IAC 2-8-16.
- (b) Failure to pay may result in administrative enforcement action, revocation of this permit, referral to the Office of Attorney General for collection, or other appropriate measures.
- (c) The Permittee shall pay the annual fee within thirty (30) calendar days of receipt of a billing by IDEM, OAM, or in a time period that is consistent with the payment schedule issued by IDEM, OAM.
- (d) If the Permittee does not receive a bill from IDEM, OAM, thirty (30) calendar days before the due date, the Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-5674 (ask for OAM, Data Support Section), to determine the appropriate permit fee. The applicable fee is due April 1 of each year.

**B.28 Enhanced New Source Review [326 IAC 2]**

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The requirements of the construction permit rules in 326 IAC 2 are satisfied by this permit for any previously unpermitted facilities, as listed in Sections A.2 and A.3.

## SECTION C SOURCE OPERATION CONDITIONS

Entire Source

### Emissions Limitations and Standards [326 IAC 2-8-4(1)]

#### C.1 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

- (a) Pursuant to 326 IAC 2-8:
- (1) The potential to emit any regulated pollutant, except for particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per three hundred sixty-five (365) consecutive day period. This limitation shall also satisfy the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD));
  - (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per three hundred sixty-five (365) consecutive day period; and
  - (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per three hundred sixty-five (365) consecutive day period.
- (b) Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), emissions of particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per three hundred sixty-five (365) consecutive day period.
- (c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(20). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does exceed the above specified limits.
- (d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

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

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.

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

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6.

**C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]**

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The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2(3).

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

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The Permittee shall be in violation of 326 IAC 6-4 if any of the criteria specified in 326 IAC 6-4-2 (1) through (4) are violated. Observations of visible emissions crossing the property line of the source at or near ground level must be made by a qualified representative of IDEM. [326 IAC 6-4-5(c)].

**C.6 Operation of Equipment [326 IAC 2-8-5(a)(4)]**

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- (a) All equipment that may emit pollutants into the ambient air shall be properly operated to meet the requirements of this permit and maintained in accordance with Section B - Preventive Maintenance Plan.
- (b) Unless otherwise stated in this permit, all air pollution control equipment listed in this permit shall be operated at all times that the emission units vented to the control equipment are in operation.
- (c) The Permittee shall perform all necessary maintenance according to the Preventive Maintenance Plan and make all necessary attempts to keep all air pollution control equipment in proper operating condition at all times such that the requirements of this permit are met.

**C.7 Asbestos Abatement Projects - Accreditation [326 IAC 14-10] [326 IAC 18-1]**

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Prior to the commencement of any demolition or renovation activities, the Permittee shall use an Indiana accredited asbestos inspector to inspect thoroughly the affected facility or part of the facility where the demolition or renovation operation will occur for the presence of asbestos, including Category I and Category II nonfriable asbestos containing material. The requirement that the inspector must be Indiana accredited is not federally enforceable.

**Testing Requirements [326 IAC 2-8-4(3)]**

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

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All testing shall be performed according to the provisions of 326 IAC 3-2.1 (Source Sampling Procedures), utilizing methods approved by the department.

The test protocol shall be submitted to:

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

No later than thirty-five (35) days before the intended test date.[326 IAC 3-2.1-2(a)]

**Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

**C.9 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]**

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Compliance with applicable requirements shall be documented in accordance with the provisions of 326 IAC 2-8-4(3). 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 shall notify:

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

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

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(33).

C.10 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the requirements of this permit shall be performed, whenever applicable according to the provisions of 326 IAC 3, or 40 CFR 60, Appendix A, as appropriate, unless some other method is specified in this permit.

C.11 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18-1] [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) Written notification is to be 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
  - (3) Waste disposal site.
- (c) The Permittee shall postmark or deliver the notice 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

- (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 prior to a renovation/demolition the owner or operator must use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos.

**Corrective Actions [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

**C.12 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]**

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If a regulated substance is present in more than a threshold quantity that is subject to 40 CFR 68:

- (a) 40 CFR 68 is an applicable requirement;
- (b) The Permittee shall 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 part of the compliance certification submitted under 326 IAC 2-8-5(a)(1), a certification statement that the source is in compliance with all the requirement 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.
- (c) Provide annual certification to IDEM, OAM that the Risk Management Plan is being properly implemented.

**C.13 Compliance Monitoring Plan - Failure to Take Corrective Action [326 IAC 2-8-4(3)]**

---

- (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) The Preventive Maintenance Plan described in Section B, Preventive Maintenance Plan, of this permit.
- (b) For each compliance monitoring condition of this permit appropriate corrective actions, as described in the Preventive Maintenance Plan, 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 corrective actions within the prescribed time contained within the Preventive Maintenance Plan shall constitute a violation of the permit unless taking the corrective action set forth in the Preventive Maintenance Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee may be excused from taking further corrective action for any of the following reasons:
- (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further corrective actions providing that prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the 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 Permittee determines that the process has already returned to operating within "normal" parameters and no corrective action is required.
- (d) Records shall be kept of all instances in which the action values were not met and of all corrective actions 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.14 Actions Related to Noncompliance Demonstrated by a Stack Test

- (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, appropriate corrective actions shall be taken. A description of these corrective actions shall be submitted to IDEM, OAM, within thirty (30) days of receipt of the test results. These corrective actions shall be implemented immediately unless notified by IDEM, OAM, that they are not acceptable. The Permittee shall make every effort to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM, reserves the right to utilize enforcement activities to resolve the non-compliant stack test(s).
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. 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.

## **Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]**

### **C.15 Monitoring Data Availability**

---

- (a) 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) When the equipment listed in Section D 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, OAM, 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 in (a) above.

### **C.16 General Record Keeping Requirements [326 IAC 2-8-4(3)(B)]**

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- (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 and available within one (1) hour upon verbal request of an IDEM, OAM, representative, for a minimum of three (3) years. They may be stored elsewhere for the remaining two (2) years providing they are made available within thirty (30) days after written request.
- (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 any required preventive maintenance and corrective actions that were implemented. Such records shall briefly describe what was done and indicate who did it. Such records may include, but are not limited to: work orders, quality assurance procedures, quality control procedures, operator's standard operating procedures, manufacturer's specifications or their equivalent, and equipment "troubleshooting" guidance.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

**C.17 General Reporting Requirements [326 IAC 2-8-4(3)(C)]**

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- (a) Unless otherwise specified in this permit, reports required by conditions in Section D of this permit shall be submitted to:
- Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015
- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be timely if delivered by any method and received and stamped by IDEM, OAM, on or before the date it is due. [326 IAC 2-5-3]
- (c) Unless otherwise specified in this permit any semi-annual report shall be submitted within thirty (30) days of the end of the six (6) month reporting period.
- (d) All instances of deviations from any requirements of this permit must be clearly identified in such reports;
- (e) Any corrective actions taken as a result of an exceedance of a limit, an excursion from the parametric values, or a malfunction that may have caused excess emissions must be clearly identified in such reports.
- (f) The first report shall cover the period commencing the date of issuance of this permit and ending the last day of the quarter that the permit is issued.

**Stratospheric Ozone Protection**

**C.18 Compliance with 40 CFR 82 [326 IAC 22-1]**

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

- (a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156
- (b) Equipment used during the maintenance, service, repair or disposal of appliances must

comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

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

## **SECTION D.1**

## **FACILITY OPERATION CONDITIONS**

- (a) one (1) boom hand lay-up area (Zone 1) which employs six (6) hand lay-up stations. This area exhausts through vent V7. This area does not have any air pollution control devices;
- (b) one (1) bucket and small parts hand lay-up area (Zone 6) which employs one (1) lay-up station. This area exhausts through vents V2 and V3. This area does not have any air pollution control devices; and
- (c) one (1) gel coat spray lay-up area (Zone 5a) which employs one (1) gel coat booth. This area utilizes air-assisted airless spray guns and exhausts through vent V1. This area also utilizes dry filters for particulate control.

### **Emission Limitations and Standards [326 IAC 2-8-4(1)]**

#### **D.1.1 Hazardous Air Pollutants (HAPs) [326 IAC 2-8-4]**

That the hazardous air pollutant emissions from the facilities in this section shall be limited as follows:

- (a) A single hazardous air pollutant (HAP) emissions shall not exceed 6.7 tons per 365 consecutive day period rolled on a daily basis.
- (b) Any combination of HAPs emissions shall not exceed 17 tons per 365 consecutive day period rolled on a daily basis.

Therefore, the requirements of 326 IAC 2-7 (Part 70 Rules) do not apply.

#### **D.1.2 Volatile Organic Compounds (VOC) [326 IAC 2-8-4]**

Any change or modification which may increase the potential VOC emissions to 25 tons per year or more from the equipment covered in this section of the permit must be approved by the Office of Air Management (OAM) before such change may occur.

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

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the gel coat spray lay-up operation shall not exceed allowable PM emission rate based on the following equation:

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

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and  
P = process weight rate in tons per hour

### **Compliance Determination Requirements**

#### **D.1.4 Testing Requirements [326 IAC 2-8-5(1)]**

Testing of the facilities in this section is not specifically required by this permit. However, this does not preclude testing requirements on these facilities under 326 IAC 2-1-4(f) and 326 IAC 2-8-4.

### **Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

**D.1.5 Preventive Maintenance Plan [326 IAC 2-8-4(9)]**

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A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the facilities in this section.

**D.1.6 Particulate Matter (PM)**

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The dry filters for PM control shall be in operation at all times when the gel coat booth is in operation.

**D.1.7 Monitoring**

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- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, daily 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 gel 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.

**Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [26 IAC 2-8-16]**

**D.1.8 Record Keeping Requirements**

---

- (a) That the Permittee shall maintain records at the source of the materials used that contain any HAP. The records shall be complete and sufficient to establish compliance with the HAP emission limit established in condition D.1.1. The records shall contain a minimum of the following:
  - (1) The weight of HAP containing material used, including purchase orders and invoices necessary to verify the type and amount used;
  - (2) The HAP content (weight percent) of each material used;
  - (3) The weight of HAPs emitted for each compliance period, considering capture and control efficiency, if applicable; and
  - (4) Identification of the facility or facilities associated with the usage of each HAP.
- (b) To document compliance with conditions D.1.6 and D.1.7, the Permittee shall maintain a log of daily overspray observations, daily and weekly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**D.1.9 Reporting Requirements**

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A quarterly summary of the information to document compliance with condition D.1.1 be submitted to the address listed in Section C - General Reporting Requirements, of this permit,

using the quarterly reporting form located at the end of this permit, or its equivalent, within thirty (30) days after the end of the quarter being reported.

## SECTION D.2 FACILITY OPERATION CONDITIONS

one (1) boom priming area (Zone 5c) which employs one (1) spray booth. This area utilizes HVLP spray guns and exhausts through vents V4 and V5. This area also utilizes dry filters for particulate control.

### Emission Limitations and Standards [326 IAC 2-8-4(1)]

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#### D.2.1 Hazardous Air Pollutants (HAPs) [326 IAC 2-8-4]

That the hazardous air pollutant input to the boom priming area shall be limited as follows:

- (a) A single hazardous air pollutant (HAP) input shall not exceed 1.7 tons per 365 consecutive day period rolled on a daily basis.
- (b) Any combination of HAPs input shall not exceed 4.4 tons per 365 consecutive day period rolled on a daily basis.

Therefore, the requirements of 326 IAC 2-7 (Part 70 Rules) do not apply.

#### D.2.2 Volatile Organic Compounds (VOC) [326 IAC 2-8-4]

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Any change or modification which may increase the potential VOC emissions to 25 tons per year or more from the equipment covered in this section of the permit must be approved by the Office of Air Management (OAM) before such change may occur.

#### D.2.3 Particulate Matter (PM) [326 IAC 6-3]

---

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the boom priming area shall not exceed allowable PM emission rate based on the following equation:

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

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and  
P = process weight rate in tons per hour

### Compliance Determination Requirements

#### D.2.4 Testing Requirements [326 IAC 2-8-5(1)]

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Testing of the boom priming area is not specifically required by this permit. However, this does not preclude testing requirements on this facility under 326 IAC 2-1-4(f) and 326 IAC 2-8-4.

### Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

#### D.2.5 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the boom priming area.

#### ~~D.2.6 Particulate Matter (PM)~~

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~~The dry filters for PM control shall be in operation at all times when the boom priming area spray booth is in operation.~~

#### D.2.7 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, 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 boom priming area spray booth 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.

#### **Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [26 IAC 2-8-16]**

#### D.2.8 Record Keeping Requirements

- (a) That the Permittee shall maintain records at the source of the materials used that contain any HAP. The records shall be complete and sufficient to establish compliance with the HAP emission limit established in condition D.2.1. The records shall contain a minimum of the following:
  - (1) The weight of HAP containing material used, including purchase orders and invoices necessary to verify the type and amount used;
  - (2) The HAP content (weight percent) of each material used;
  - (3) The weight of HAPs emitted for each compliance period, considering capture and control efficiency, if applicable; and
  - (4) Identification of the facility or facilities associated with the usage of each HAP.
- (b) To document compliance with conditions D.2.6 and D.2.7, the Permittee shall maintain a log of daily overspray observations, daily and weekly inspections, and those additional inspections prescribed by the Preventative Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.2.9 Reporting Requirements

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

## SECTION D.3 FACILITY OPERATION CONDITIONS

### *Insignificant activities:*

- (a) one (1) boom painting area (Zones 5B) which employs one (1) spray booth. This area utilizes HVLP spray guns and exhausts through vents V2 and V3. This area also utilizes dry filters for particulate control.
- (b) grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors, and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking operations.

\* boom and small parts grinding operations

### **Emission Limitations and Standards [326 IAC 2-8-4(1)]**

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

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the boom painting area and boom and small parts grinding operations shall not exceed allowable PM emission rate based on the following equation:

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

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and  
P = process weight rate in tons per hour

#### D.3.2 Volatile Organic Compounds (VOC) [326 IAC 2-8-4]

Any change or modification which may increase the potential VOC emissions to 25 tons per year or more from the boom painting area must be approved by the Office of Air Management (OAM) before such change may occur.

### **Compliance Determination Requirement**

#### D.3.3 Testing Requirements [326 IAC 2-8-5(1)]

Testing of facilities in this section is not specifically required by this permit. However, this does not preclude testing requirements on these facilities under 326 IAC 2-1-4(f) and 326 IAC 2-7-6(1).

State Form 47738 (5-96)

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

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
CERTIFICATION**

Source Name: Hy-Tec Fiberglass, Inc.  
Source Address: 2204 Suppliers Court, Fort Wayne, Indiana 46818  
Mailing Address: 2204 Suppliers Court, Fort Wayne, Indiana 46818  
FESOP No.: F003-8074-00170

**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 Deviation Occurrence Reporting Form (For Material Usage, Quality, Etc.)
- 9 Test Result (specify) \_\_\_\_\_
- 9 Report (specify) \_\_\_\_\_
- 9 Notification (specify) \_\_\_\_\_
- 9 Other (specify) \_\_\_\_\_

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

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

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
DEVIATION OCCURRENCE REPORT**

Source Name: Hy-Tec Fiberglass, Inc.  
Source Address: 2204 Suppliers Court, Fort Wayne, Indiana 46818  
Mailing Address: 2204 Suppliers Court, Fort Wayne, Indiana 46818  
FESOP No.: F003-8074-00170

If a deviation has occurred a separate copy of this report must be submitted for **each** material type, quantity usage and operation limitation (except control equipment monitoring) listed in this permit .  
Attach a signed certification to complete this report.

Stack/Vent ID:
Equipment/Operation:
Parameter Subject to Material Type, Quantity Usage or Operation Limitations Specified in the Permit: (ex: 2500 lb/day, 300 hours/yr, 5000 gallons/month)
Determination Period for this Parameter: (ex: 365-day rolling sum, fixed monthly rate)
<b>9</b> Permit Has No Rate Limitations for this Parameter.
Content Restriction for this Parameter: (ex: maximum of 40% VOC in inks, 0.5% sulfur content)
Demonstration Method for this Parameter: (ex: MSDS, Supplier, material sampling & analysis)
<b>9</b> Permit Has No Content Limitations for this Parameter.
Comments:

## COMPLIANCE DATA SECTION

### FESOP Quarterly Report

(MAKE A COPY OF THIS FORM AS NECESSARY)

Source Name: Hy-Tec Fiberglass, Inc.  
 Source Address: 2204 Suppliers Court, Fort Wayne, Indiana 46818  
 Mailing Address: 2204 Suppliers Court, Fort Wayne, Indiana 46818  
 FESOP No.: F003-8074-00170  
 Facility: (a) one (1) boom hand lay-up area (Zone 1);  
 (b) one (1) bucket and small parts hand lay-up area (Zone 6); and  
 (c) one (1) gel coat area (Zone 5a).  
 Parameter: Total HAP usage/emissions  
 Limit: single HAP = 6.7 tons per 365 consecutive day period rolled on a daily basis  
 total HAPs = 17 tons per 365 consecutive day period rolled on a daily basis  
 Equation: Single HAP emissions (tons/day) =  
 $\{G [\text{density of material (lb/gal)} * \text{wt. \% of each HAP} * \text{gallons of each material (gal/unit)} * (\text{actual units/hr}) * (\text{actual hrs/day}) * \text{emission factor, Ef}] * 1 \text{ ton}/2,000 \text{ lbs.}$

Ef for hand lay-up of resin = 0.075

Ef for hand lay-up of gel coat = 0.305

Month 1: \_\_\_\_\_ Year: \_\_\_\_\_

Day	Emissions of worst case HAP this day (tons)	Emissions of worst case HAP for previous 365 days (tons)	Total HAPs emissions this day (tons)	Total HAPs emissions for previous 365 days (tons)	Day	Emissions of worst case HAP this day(tons)	Emissions of worst case HAP for previous 365 days (tons)	Total HAPs emissions this day (tons)	Total HAPs emissions for previous 365 days (tons)
1					17				
2					18				
3					19				
4					20				
5					21				
6					22				
7					23				
8					24				
9					25				
10					26				
11					27				
12					28				
13					29				
14					30				
15					31				
16					no. of deviations				

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

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

Submitted by: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

## COMPLIANCE DATA SECTION

### FESOP Quarterly Report

(MAKE A COPY OF THIS FORM AS NECESSARY)

Source Name: Hy-Tec Fiberglass, Inc.  
 Source Address: 2204 Suppliers Court, Fort Wayne, Indiana 46818  
 Mailing Address: 2204 Suppliers Court, Fort Wayne, Indiana 46818  
 FESOP No.: F003-8074-00170  
 Facility: one (1) boom priming area (Zone 5c);  
 Parameter: HAP input to the boom priming area  
 Limit: single HAP = 1.7 tons per 365 consecutive day period rolled on a daily basis  
 Total HAPs = 4.4 tons per 365 consecutive day period rolled on a daily basis  
 Equation: Single HAP input (tons/day) =  
 $\{G \text{ [density of material (lb/gal)]} * \text{wt. \% of each HAP} * \text{gallons of each material (gal/unit)} * \text{(actual units/hr)} * \text{(actual hrs/day)}\} * 1 \text{ ton/2,000 lbs.}$

Month 1: \_\_\_\_\_ Year: \_\_\_\_\_

Day	Input of worst case HAP this day (tons)	Input of worst case HAP for previous 365 days (tons)	Total HAPs input this day (tons)	Total HAPs input for previous 365 days (tons)	Day	Input of worst case HAP this day(tons)	Input of worst case HAP for previous 365 days (tons)	Total HAPs input this day (tons)	Total HAPs input for previous 365 days (tons)
1					17				
2					18				
3					19				
4					20				
5					21				
6					22				
7					23				
8					24				
9					25				
10					26				
11					27				
12					28				
13					29				
14					30				
15					31				
16					no. of deviations				

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

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

Submitted by: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

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

Technical Support Document (TSD) for a  
Federally Enforceable State Operating Permit (FESOP)

**Source Background And Description**

<b>Source Name:</b>	<b>Hy-Tec Fiberglass, Inc.</b>
<b>Source Location:</b>	<b>2204 Suppliers Court, Fort Wayne, Indiana 46818</b>
<b>County:</b>	<b>Allen County</b>
<b>SIC Code:</b>	<b>3089</b>
<b>Operation Permit No.:</b>	<b>F003-8074-00170</b>
<b>Permit Reviewer:</b>	<b>Marco A. Salenda</b>

The Office of Air Management (OAM) has reviewed a Federally Enforceable State Operating Permit (FESOP) application from Hy-Tec Fiberglass, Inc. relating to the operation of a reinforced plastic products manufacturing plant.

**Unpermitted Emission Units and Pollution Control Equipment**

The source is unpermitted and consists of the following facilities/units:

- (1) one (1) boom hand lay-up area (Zone 1) which employs six (6) hand lay-up stations. This area exhausts through vent V7;
- (2) one (1) bucket and small parts hand lay-up area (Zone 6) which employs one (1) lay-up station. This area exhausts through vents V2 and V3; and
- (3) one (1) gel coat area (Zone 5a) which employs one (1) gel coat booth. This area exhausts through vent V1.

These facilities do not have any air pollution control devices.

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

The entire source is to be reviewed under the ENSR process.

**Insignificant Activities**

The source also includes the following insignificant activities:

- (1) two (2) boom finishing areas (Zones 5B and 5C);
- (2) natural gas-fired combustion units with heat input equal to or less than ten million (10,000,000) Btu per hour;
- (3) application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings;
- (4) water based adhesives that are less than or equal to 5 percent by volume of volatile organic compounds (VOCs) excluding hazardous air pollutants (HAPs);

- (5) trimmers that do not produce fugitive emissions and that are equipped with a dust collection system or trim material recovery device such as a bag filter or cyclone;
- (6) on-site fire and emergency response training approved by the department;
- (7) grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors, and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking operations; and
- (8) mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals measured at 38 degrees Celsius).

### Enforcement Issue

- (1) IDEM is aware that the entire source has been constructed and operated prior to receipt of the proper permit
- (2) IDEM is reviewing this matter and will take appropriate action. This proposed permit will also satisfy the requirements of the construction permit rules.

### Recommendation

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

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

An administratively complete FESOP application for the purposes of this review was received on January 2, 1997. Additional information was received on March 3, 1997.

### Emissions Calculations

See Appendix A: Emissions Calculations for detailed calculations (three pages).

### Potential Emissions

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

Pollutant	PTE (tons/year)
PM	0.0
PM-10	0.0
SO <sub>2</sub>	0.0
VOC	13
CO	0.0
NO <sub>x</sub>	0.0

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

See attached spreadsheets for detailed calculations (page 1 of Appendix A).

HAP	PTE (tons/year)
Styrene	13
Methyl methacrylate	0.3
<b>TOTAL HAPs</b>	<b>13.3</b>

See attached spreadsheets for detailed calculations (page 2 of Appendix A).

- (1) The potential emissions (as defined in Indiana Rule) of a single HAP is greater than ten (10) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (2) This source, otherwise required to obtain a Title V permit, has agreed to accept a permit with federally enforceable limits that restrict its PTE to below the Title V emission levels. Therefore, this source will be issued a Federally Enforceable State Operating Permit (FESOP), pursuant to 326 IAC 2-8.

**Limited Potential To Emit**

- (1) The source has accepted a limit on potential to emit of 9.4 tons per 365 consecutive day period for any single HAP and 19 tons per 365 consecutive day period for any combination of HAPs.
- (2) The table below summarizes the total limited potential to emit of the significant and insignificant emission units.

	Limited PTE (tons/yr)
Process/facility	single HAP
Boom fabrication via hand lay-up	7.4
Bucket fabrication via hand lay-up	
Small parts fabrication via hand lay-up	
Insignificant activities	2.0
<b>Total Emissions</b>	<b>9.4</b>

Attached Table (1) summarizes the permit conditions and requirements.

**County Attainment Status**

The source is located in Allen County.

Pollutant	Status
TSP	attainment
PM-10	attainment
SO <sub>2</sub>	attainment
Ozone	attainment
CO	attainment
Lead	attainment

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

### Federal Rule Applicability

- (1) There are no New Source Performance Standards (326 IAC 12) applicable to any facility at this source.
- (2) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) applicable to any facility at this source.

### State Rule Applicability - Entire Source

- (1) 326 IAC 2-6 (Emission Reporting)  
Since this source does not have the potential to emit any criteria pollutant equal to or greater than 100 tons per year, 326 IAC 2-6 does not apply.
- (2) 326 IAC 4 (Open Burning)  
This rule requires that 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 source is currently in compliance with this rule.
- (3) 326 IAC 4-2 (Incineration) and 326 IAC 9-1-2(3)  
This rule requires that the permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2(3). The source is currently in compliance with this rule.
- (4) 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.
- (5) 326 IAC 6-4 (Fugitive Dust Emissions)  
This rule requires the source not to generate fugitive dust to the extent that some portion of the material escapes beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located.

### State Rule Applicability - Individual Facilities

- (1) 326 IAC 6-3-2 (Particulate Matter Limitations for Process Operations)  
This rule requires that the particulate matter (PM) emissions from the boom and small parts grinding operations (insignificant activities) be limited by the following:  
  
Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:  
  
$$E = 4.10 P^{0.67}$$
where E = rate of emission in pounds per hour and  
P = process weight rate in tons per hour
- (2) 326 IAC 8-1-6 (VOC Reduction Requirements)

This rule does not apply to any of the facilities at this source since the potential VOC emissions from each facility do not exceed 25 tons per year.

## Compliance Requirements

Permits issued under 326 IAC 2-8 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 2-8-4. 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 determination and compliance monitoring requirements applicable to this source are as follows:

- (1) The boom, bucket, and small parts hand lay-up areas have applicable compliance determination conditions as specified below:

That the Permittee shall maintain records at the source of the materials used that contain any HAP. The records shall be complete and sufficient to establish compliance with the HAP emission limit established under 326 IAC 2-8 (FESOP Rule). The records shall contain a minimum of the following:

- (a) The weight of HAP containing material used, including purchase orders and invoices necessary to verify the type and amount used;
  - (b) The HAP content (weight percent) of each material used;
  - (c) The weight of HAPs emitted for each compliance period, considering capture and control efficiency, if applicable; and
  - (d) Identification of the facility or facilities associated with the usage of each HAP.
- (2) The boom, bucket, and small parts hand lay-up areas have applicable compliance monitoring conditions as specified below:

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of the permit, is required for the boom, bucket, and small parts hand lay-up areas.

### **Air Toxic Emissions**

Indiana presently requests applicants to provide information on emissions of the 189 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) FESOP Application GSD-08.

This source will emit levels of air toxics less than those which constitute a major source according to Section 112 of the 1990 Amendments to Clean Air Act.

### **Conclusion**

The operation of this reinforced plastic products manufacturing plant will be subject to the conditions of the attached proposed **FESOP No. F003-8074-00170**.

Table (1)

<b>Stack/Vent ID:</b>	(a) V7; (b) V2 and V3; (c) V1			
<b>Stack/Vent Dimensions:</b>	Ht: (a), (b), (c) 5 ft	Dia: (a), (b), (c) 2 ft	Temp: (a), (b), (c) ambient	Flow: (a), (b), (c) 5,480 acfm
<b>Emission Unit:</b>	(a) Zone 1 (b) Zone 6 (c) Zone 5a			
<b>Date of Construction:</b>	(a) 1983 (b), (c) 1984			
<b>Alternative Scenario:</b>	none			
<b>Pollution Control Equipment:</b>	none			
<b>General Description of Requirement:</b>	HAP emission limitation			
<b>Numerical Emission Limit:</b>	(a) single HAP - 7.4 tons per 365 consecutive day period rolled on a daily basis; (b) total HAPs - 19 tons per 365 consecutive period rolled on a daily basis.			
<b>Regulation/Citation:</b>	326 IAC 2-8-4			
<b>Compliance Demonstration:</b>	record keeping			
<b>PERFORMANCE TESTING</b>	n/a			
<b>COMPLIANCE MONITORING</b>				
<b>Monitoring Description:</b>	Implementation of a PMP			
<b>Monitoring Method:</b>	n/a			
<b>Monitoring Regulation/Citation:</b>	326 IAC 2-8-4(9)			
<b>Monitoring Frequency:</b>	within 90 days after permit issuance			
<b>RECORD KEEPING</b>				
<b>Parameter/Pollutant to be Recorded:</b>	HAP emissions			
<b>Recording Frequency:</b>	daily			
<b>REPORTING REQUIREMENTS</b>				
<b>Information in Report:</b>	(a) daily worst case single HAP and total HAPs emissions (b) worst case single and total HAPs emissions for previous 365 days			
<b>Reporting Frequency/Submittal:</b>	quarterly			
<b>Additional Comments:</b>	none			

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

Addendum to the  
Technical Support Document for Federally Enforceable State Operating Permit (FESOP)

**Hy-Tec Fiberglass, Inc.  
2204 Suppliers Court, Fort Wayne, Indiana 46818**

**F-003-8074, Plt ID-003-00170**

On July 25, 1997, the Office of Air Management (OAM) had a notice published in the Fort Wayne Journal Gazette, Fort Wayne, Indiana, stating that Hy-Tec Fiberglass, Inc. had applied for a Federally Enforceable State Operating Permit (FESOP) to operate a reinforced plastic products manufacturing plant with control. The notice also stated that OAM proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On July 31, 1997, Michael Hiatt, OAM-Air Compliance Section inspector, submitted comments on the proposed FESOP via office memorandum. The summary of the comments and corresponding responses is as follows:

**Comment**

Where are the surface coating operations (i.e., priming and painting operations) listed in the permit? Particulate emissions from these operations are controlled with dry filters. Also, particulate emissions from the gelcoat operation are controlled with dry filters.

**Response**

The priming and painting operations, identified as Zones 5c and 5b, respectively, were listed in the proposed permit under insignificant activities as boom finishing operations. VOC and HAP emissions from these operations were revisited and based on calculations, only the painting operation is considered insignificant. Therefore, a new section D.2 in the permit is created for the priming operation. This section includes emission standards, record keeping and reporting requirements applicable to this facility only.

Since the potential HAP emissions for the entire source exceed the Title V threshold, HAP input to the priming operation is limited to the following, in agreement with Hy-Tec:

- (a) A single hazardous air pollutant (HAP) input shall not exceed 1.7 tons per 365 consecutive day period rolled on a daily basis.
- (b) Any combination of HAPs input shall not exceed 4.4 tons per 365 consecutive day period rolled on a daily basis.

The HAP usage and HAP emissions are equivalent in the case of the priming operation.

The total HAP emission limit for the boom hand lay-up area (Zone 1), bucket and small parts hand lay-up area (Zone 6), and gel coat spray lay-up area (Zone 5a) is also reduced to the following such that the source-wide HAPs emissions does not exceed 9.4 tons per 365 consecutive day period for a single HAP and 24 tons per 365 consecutive day period for any combination of HAPs:

- (a) A single hazardous air pollutant (HAP) emissions shall not exceed 6.7 tons per 365 consecutive day period rolled on a daily basis.

- (b) Any combination of HAPs emissions shall not exceed 17 tons per 365 consecutive day period rolled on a daily basis.

The description of the gel coat spray lay-up area in sections A.2 and D.1 of the permit is changed to include the dry filters. In addition, the following compliance monitoring conditions have been added to section D.1:

D.1.6 Particulate Matter (PM)

The dry filters for PM control shall be in operation at all times when the gel coat booth is in operation.

D.1.7 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, 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 gel 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.

The following has also been added under the record keeping requirements for the gel coat spray lay-up area (renumbered as D.1.8) :

- (b) To document compliance with conditions D.1.6 and D.1.7, the Permittee shall maintain a log of daily overspray observations, daily and weekly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

The painting operation (Zone 5b), although an insignificant activity, has applicable requirements in section D.3. But, no compliance monitoring requirements are imposed.

Appendix A: Summary of Emissions Calculations  
Reinforced Plastics and Composites

Company Name: Hy-Tec Fiberglass, Inc.  
 Address City IN Zip: 2204 Suppliers Court, Fort Wayne, IN 46818  
 FESOP No.: F 003-8074-00170  
 Pit ID: 003-00170  
 Reviewer: Marco A. Salenda  
 Date: January 2, 1997

Pollutant	Ebc (tons/yr)	Eac (tons/yr)	Allowable (tons/yr)
PM	0.0	0.0	99.0
PM-10	0.0	0.0	99.0
VOC	13.1	13.1	99.0
Total HAPs:	19.0	19.0	7.4 single/ 19.0 combination
Styrene	12.8	12.8	
Methyl methacrylate	0.3	0.3	

Process	Total HAPs	Single HAP
Boom hand lay-up		
Bucket hand lay-up	19.0	7.4
Small parts hand lay-up		
insig. act.	5.0	2.0
TOTAL	24.0	9.4