

**CONSTRUCTION PERMIT
OFFICE OF AIR MANAGEMENT**

**Ultra/Glas of Lakeville, Inc.
520 Industrial Drive
Lakeville, IN 46536**

is hereby authorized

to construct and operate a modification to the fiberglass tubs and showers manufacturing plant, consisting of the following equipment:

one (1) booth for spray layup of resin with a maximum process rate of 152 pounds of resin per hour, exhausting through an existing stack (stack ID #A).

This permit is issued to the above mentioned company (herein known as the Permittee) under the provisions of 326 IAC 2-1 and 40 CFR 52.780, with conditions listed on the attached pages.

| | |
|---|----------------|
| Construction Permit No.: CP-141-8590-00071 | |
| Issued by: Paul Dubenetzky, Branch Chief Office of Air Management | Issuance Date: |

Construction Conditions

General Construction Conditions

1. That the data and information supplied with the application shall be considered part of this permit. Prior to any proposed change in construction which may affect allowable emissions, the change must be approved by the Office of Air Management (OAM).
2. That this permit to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

Effective Date of the Permit

3. That pursuant to IC 13-15-5-3, this permit becomes effective upon its issuance.
4. That pursuant to 326 IAC 2-1-9(b)(Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.
5. That notwithstanding Construction Condition No. 6, all requirements and conditions of this construction permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

First Time Operation Permit

6. That this document shall also become a first-time operation permit pursuant to 326 IAC 2-1-4 (Operating Permits) when, prior to start of operation, the following requirements are met:
 - (a) The attached affidavit of construction shall be submitted to the Office of Air Management (OAM), Permit Administration & Development Section, verifying that the facilities were constructed as proposed in the application. The facilities covered in the Construction Permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM.
 - (b) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.
 - (c) Permittee shall receive an Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section and attach it to this document.
 - (d) The operation permit will be subject to annual operating permit fees pursuant to 326 IAC 2-1-7.1(Fees).
 - (e) The Permittee has submitted their Part 70 (T-141-7689-00071) application on December 13, 1996 for the existing source. The equipment being reviewed under this permit shall be incorporated in the submitted Part 70 application.

7. That when the facility is constructed and placed into operation the following operation conditions shall be met:

Operation Conditions

General Operation Conditions

1. That the data and information supplied in the application shall be considered part of this permit. Prior to any change in the operation which may result in an increase in allowable emissions exceeding those specified in 326 IAC 2-1-1 (Construction and Operating Permit Requirements), the change must be approved by the Office of Air Management (OAM).
2. That the permittee shall comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder.

Preventive Maintenance Plan

3. That pursuant to 326 IAC 1-6-3 (Preventive Maintenance Plans), the Permittee shall prepare and maintain a preventive maintenance plan, including the following information:
- (a) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices.
 - (b) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions.
 - (c) Identification of the replacement parts which will be maintained in inventory for quick replacement.

The preventive maintenance plan shall be submitted to IDEM, OAM upon request and shall be subject to review and approval.

Transfer of Permit

4. That pursuant to 326 IAC 2-1-6 (Transfer of Permits):
- (a) In the event that ownership of Ultra/Glas of Lakeville, Inc. is changed, the Permittee shall notify OAM, Permit Branch, within thirty (30) days of the change. Notification shall include the date or proposed date of said change.
 - (b) The written notification shall be sufficient to transfer the permit from the current owner to the new owner.
 - (c) The OAM shall reserve the right to issue a new permit.

Permit Revocation

5. That pursuant to 326 IAC 2-1-9(a)(Revocation of Permits), this permit to construct and operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of 326 IAC 2-1 (Permit Review Rules).

Availability of Permit

6. That pursuant to 326 IAC 2-1-3(l), the Permittee shall maintain the applicable permit on the premises of this source and shall make this permit available for inspection by the IDEM, St. Joseph County Health Department or other public official having jurisdiction.

Annual Emission Reporting

7. That pursuant to 326 IAC 2-6 (Emission Reporting), the Permittee must annually submit an emission statement for the source. This statement 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 statement must be submitted to:

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

and

St. Joseph County Health Department
County-City Building
Room 914
South Bend, Indiana 46601-1870

The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30.

Opacity Limitations

8. That pursuant to 326 IAC 5-1-2 (Visible Emission Limitations) except as provided in 326 IAC 5-1-3 (Temporary Exemptions), the visible emissions shall meet the following:
- (a) Visible emissions shall not exceed an average of 40% opacity in 24 consecutive readings.
 - (b) Visible emissions shall not exceed 60% opacity for more than a cumulative total of 15 minutes (60 readings) in a 6-hour period.

BACT Minor Limitation

9. That the input VOC including release agent, minus the VOC solvent shipped out, delivered to the applicators of the resin spray layup booth shall be limited to 20 tons per month. This production limitation is equivalent to VOC emissions of 2 tons per month, based on 10% VOC flash off for the spray layup operation. Therefore, the Best Available control Technology (BACT) requirements of 326 IAC 8-1-6 will not apply. This production limitation will also render the Prevention of Significant Deterioration (PSD) rules, 326 IAC 2-2 and 40 CFR 52.21, not applicable.

Reporting Requirements

10. That a log of information necessary to document compliance with operation permit condition no. 9 shall be maintained. These records shall be kept for at least the past 36 month period and made available upon request to the Office of Air Management (OAM).

- (a) A quarterly summary 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

and

St. Joseph County Health Department
County-City Building
Room 914
South Bend, Indiana 46601-1870

within thirty (30) calendar days after the end of the quarter being reported in the format attached. These reports shall include VOC usage and emissions. These records shall include the raw material, release agent and clean up solvent usage, material safety data sheet (MSDS) and the date of use.

- (b) Unless otherwise specified in this permit, any notice, report, or other submissions required by this permit shall be timely if:
- (i) Postmarked on or before the date it is due; or
 - (ii) Delivered by any other method if it is received and stamped by IDEM, OAM and St. Joseph County Health Department, on or before the date it is due.
- (c) All instances of deviations from any requirements of this permit must be clearly identified in such reports.
- (d) 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.

- (e) The first report shall cover the period commencing the postmarked submission date of the Affidavit of Construction.

Open Burning

- 11. 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.

Emergency Reduction Plans

- 12. 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 180 calendar days from the issuance date of this permit.

- (c) If the ERP is disapproved by IDEM, OAM and St. Joseph County Health Department, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP. If after this time, the Permittee does not submit an approvable ERP, IDEM, OAM and St. Joseph County Health Department, shall supply such a plan.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (g) Upon direct notification by IDEM, OAM and St. Joseph County Health Department, 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 level. [326 IAC 1-5-3]

**Indiana Department of Environmental Management
Office of Air Management
Compliance Data Section
and
St. Joseph County Health Department**

Quarterly Report

Company Name: Ultra/Glas of Lakeville, Inc.
Location: 520 Industrial Drive, Lakeville, IN 46536
Permit No.: CP 141-8590-00071
Source: Resin Spray Layup Booth
Pollutant: Volatile Organic Compounds (VOC)
Limit: VOC usage of 20 tons per month; this is equivalent to 2 tons per month in VOC emissions based on 10% VOC flash off

Year: _____

| Month | VOC Usage (tons/month) | VOC Emissions (10% of VOC Usage, tons/month) |
|-------|---------------------------|--|
| | | |
| | | |
| | | |

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Indiana Department of Environmental Management
Office of Air Management
 and
St. Joseph County Health Department

Technical Support Document (TSD) for New Construction and Operation

Source Background and Description

Source Name: Ultra/Glas of Lakeville, Inc.
 Source Location: 520 Industrial Dr., Lakeville, IN 46536
 County: St. Joseph
 Construction Permit No.: CP-141-8590-00071
 SIC Code: 3088
 Permit Reviewer: Scott Pan/EVP

The Office of Air Management (OAM) has reviewed an application from Ultra/Glas of Lakeville, Inc. relating to the construction and operation of a modification to the fiberglass tubs and showers manufacturing plant, consisting of the following equipment:

- (a) one (1) booth for spray layup of resin with a maximum process rate of 152 pounds of resin per hour, exhausting through an existing stack (stack ID #A).

Stack Summary

| Stack ID | Operation | Height (feet) | Diameter (feet) | Flow Rate (acfm) | Temperature (°F) |
|----------|-------------|---------------|-----------------|------------------|------------------|
| A | Spray Booth | 16 | 4 | 30,000 | Ambient |

Recommendation

The staff recommends to the Commissioner that the construction and operation 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 application for the purposes of this review was received on May 14, 1997, with additional information received on June 11, 1997.

Emissions Calculations

See Appendix A (Emissions Calculation Spreadsheets) for detailed calculations (1 page).

Total Potential and Allowable Emissions

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

| Pollutant | Allowable Emissions (tons/year) | Potential Emissions (tons/year) |
|--------------------------------------|---------------------------------|---------------------------------|
| Particulate Matter (PM) | --- | 0.0 |
| Particulate Matter (PM10) | --- | 0.0 |
| Sulfur Dioxide (SO ₂) | --- | 0.0 |
| Volatile Organic Compounds (VOC) | 249 | 32.6 |
| Carbon Monoxide (CO) | -- | 0.0 |
| Nitrogen Oxides (NO _x) | -- | 0.0 |
| Single Hazardous Air Pollutant (HAP) | -- | 31.9 |
| Combination of HAPs | -- | 31.9 |

- (a) Allowable emissions are determined from the applicability of rule 326 IAC 2-2. See attached spreadsheet for detailed calculations.
- (b) The potential emissions before control are less than the allowable emissions, therefore, the potential emissions before control are used for the permitting determination.
- (c) Allowable emissions (as defined in the Indiana Rule) of volatile organic compounds (VOC) are greater than 25 tons per year and allowable emissions of a single hazardous air pollutant (HAP) are greater than 10 tons per year and the allowable emissions of any combination of the HAPs are greater than 25 tons per year. Therefore, pursuant to 326 IAC 2-1, a construction permit is required.
- (e) Pursuant to the IDEM's Policy on Air Toxic Rules, dated December 13, 1995, IDEM will not enforce the provisions of 326 IAC 2-1-1(b)(1)(H), as adopted by the Air Board on March 10, 1994. This means that modification of a major source of HAPs which will increase the allowable emissions of any one (1) HAP by 4 tons per year or any combination of HAPs by 10 tons per year will not be required to obtain a construction permit. The Policy is in effect immediately and will continue to be in effect until the effective date of amendments to Indiana's rule for new and modified sources of HAPs. This Policy may be extended or modified at IDEM's discretion.

However, this construction permit is required because of the requirements of 326 IAC 2-1, Sections 1 and 3.

County Attainment Status

- (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. St. Joseph County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

- (b) Area of St. Joseph County where the source is located has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for PSD, 326 IAC 2-2 and 40 CFR 52.21.

Source Status

Existing Source PSD Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity as listed in Construction Permit CP 141-3333-00071, issued on May 12, 1994):

| Pollutant | Emissions (ton/yr) |
|-----------|--------------------|
| VOC | 92.5 |

This existing source is **not** a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not in one of the 28 listed source categories.

Proposed Modification

PTE from the proposed modification (based on 8,760 hours of operation per year at rated capacity including enforceable emission production limit):

| Pollutant | PM (ton/yr) | PM10 (ton/yr) | SO ₂ (ton/yr) | VOC (ton/yr) | CO (ton/yr) | NO _x (ton/yr) |
|-------------------------------|-------------|---------------|--------------------------|--------------|-------------|--------------------------|
| Proposed Modification | 0 | 0 | 0 | 24 * | 0 | 0 |
| PSD or Offset Threshold Level | 250 | 250 | 250 | 250 | 250 | 250 |

* VOC emissions are limited at 24 tons per year, such that 326 IAC 8-1-6 does not apply.

This modification to an existing minor stationary source is not major because the emission increase is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2 and 40 CFR 52.21, the PSD requirements do not apply.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source has submitted their Part 70 (T-141-7689-00071) application on December 13, 1996. The equipment being reviewed under this permit shall be incorporated in the submitted Part 70 application.

Federal Rule Applicability

There are no New Source Performance Standards (326 IAC 12) and 40 CFR Part 63 applicable to this facility.

State Rule Applicability

326 IAC 2-6 (Emission Reporting)

This facility is subject to 326 IAC 2-6 (Emission Reporting), because the source is located in St. Joseph county and emits more than 10 tons/yr of VOC. Pursuant to this rule, the owner/operator of this facility must annually submit an emission statement of the facility. The annual statement must be received by April 15 of each year and must contain the minimum requirements as specified in 326 IAC 2-6-4.

326 IAC 5-1-2 (Visible Emission Limitations)

This rule establishes visible emission limitations, excluding water vapor, emitted by a source or facility. Pursuant to the requirements of 326 IAC 5-1-2 (Visible Emission Limitations), visible emissions from a source or facility located in the particulate matter attainment portion of St. Joseph County shall not exceed 40 % opacity averaged over 24 consecutive readings and shall not exceed 60% opacity for more than 15 minutes in any six-hour period.

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

The equipment covered in this modification is not subject to 326 IAC 8-1-6 (New Facilities, General Reduction Requirements) which mandates that a Best Available Control Technology (BACT) analysis be performed for new facilities commencing operations after January 1, 1980 which have potential VOC emissions of 25 tons or more and are not regulated by other provisions of Article 8. Total VOC emissions, based on 10% VOC flash off for resin spray layup in the spray booth covered under this modification, will be limited to 24 tons/yr (see page 1 of 1 TSD Appendix A). Therefore the requirements of 326 IAC 8-1-6 do not apply. This limit will also make 326 IAC 2-2 (PSD) not applicable.

No other article 8 rules apply.

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) Construction Permit Application Form Y.

This proposed modification will emit levels of air toxics greater than those that constitute major source applicability according to Section 112 of the Clean Air Act. The concentrations of these air toxics were modeled and found to be (in worst case possible) as follows: The concentrations of these air toxics were compared to the Permissible Exposure Limits (PEL) developed by the Occupational Safety and Health Administration (OSHA). The Office of Air Management (OAM) does not have at this time any specific statutory or regulatory authority over these substances.

Air Toxics Analysis

| Pollutant | Rate (lb/hr) | Rate (ton/yr) | Modeled Conc. (Fg/m ³) | OSHA PEL (Fg/m ³) | % OSHA PEL |
|-----------|--------------|---------------|------------------------------------|-------------------------------|------------|
| Styrene | 7.28 | 23.5 | 4,354 | 428,000 | 1.02% |

Rate ton/yr = (rate lb/hr) * (hr/yr of operation) * (ton/2000 lbs) * usage limit (73.6%)

Conclusion

The construction of this modification to a fiberglass tubs and showers manufacturing plant will be subject to the conditions of the attached proposed **Construction Permit No. CP-141-8590-00071**.

Mail to: Permit Administration & Development Section
Office Of Air Management
100 North Senate Avenue
P. O. Box 6015
Indianapolis, Indiana 46206-6015

Ultra/Glas of Lakeville, Inc.
P.O. Box 407
Lakeville, Indiana 46536

Affidavit of Construction

I, _____, being duly sworn upon my oath, depose and say:
(Name of the Authorized Representative)

1. I live in _____ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.
2. I hold the position of _____ for _____.
(Title) (Company Name)
3. By virtue of my position with _____, I have personal
(Company Name)
knowledge of the representations contained in this affidavit and am authorized to make these representations on behalf of _____.
(Company Name)
4. I hereby certify that Ultra/Glas of Lakeville, Inc., 520 Industrial Dr. Lakeville, Indiana, 46536, has constructed the modification to the fiberglass tubs and showers manufacturing plant in conformity with the requirements and intent of the construction permit application received by the Office of Air Management on May 14, 1997 and as permitted pursuant to **Construction Permit No. CP-141-8590, Plant ID No. 141-00071** issued on _____.
5. I hereby certify that Ultra/Glas of Lakeville, Inc. is subject to the Title V program and has submitted a Title V operating permit application (T-141-7689-00071) on December 13, 1996. The equipment constructed for the modification shall be incorporated in the submitted Title V operating permit within twelve (12) months from the postmarked submission date of this Affidavit of Construction.

Further Affiant said not.

I affirm under penalties of perjury that the representations contained in this affidavit are true, to the best of my information and belief.

Signature

Date

STATE OF INDIANA)
)SS

COUNTY OF _____)

Subscribed and sworn to me, a notary public in and for _____ County and State of
Indiana on this _____ day of _____, 19 _____.

My Commission expires: _____

Signature

Name (typed or printed)