

**CONSTRUCTION PERMIT  
OFFICE OF AIR MANAGEMENT**

**Budd Company Plastics Division, The  
2620 Marion Drive  
Kendallville, Indiana 46755**

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-113-9465-00018	
Issued by:  Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

<b>SECTION A</b>	<b>SOURCE SUMMARY</b>	<b>4</b>
A.1	General Information	4
A.2	Emission Units and Pollution Control Equipment Summary	4
A.3	Part 70 Permit Applicability [326 IAC 2-7-2]	4
<b>SECTION B</b>	<b>CONSTRUCTION CONDITIONS</b>	<b>5</b>
<b>General Construction Conditions [326 IAC 2-1-3]</b>		
B.1	Allowable Emissions	5
B.2	General Rule Applicability	5
B.3	Effective Date of Permit [IC 13-15-5-3]	5
B.4	Revocation of Permits [326 IAC 2-1-9(b)]	5
B.5	Modification of Construction Conditions	5
B.6	First Time Operation Permit [2-1-4]	5
<b>SECTION C</b>	<b>SOURCE OPERATION CONDITIONS</b>	<b>6</b>
<b>General Operation Conditions [326 IAC 2-1-4]</b>		
C.1	General Operation Conditions	6
C.2	Preventive Maintenance [326 IAC 1-6-3]	6
C.3	Transfer of Permit [326 IAC 2-1-6]	6
C.4	Permit Revocation [326 IAC 2-1-9(a)]	6
C.5	Availability of Permit [326 IAC 2-1-3(l)]	7
C.6	Opacity [326 IAC 5-1-2]	7
C.7	Open Burning [326 IAC 4-1][IC 13-17-9]	7
C.8	Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]	7
C.9	Emergency Reduction Plans [326 IAC 1-5-2]	7
C.10	Asbestos Abatement Projects - Accreditation [326 IAC 14-10] [326 IAC 18-1]	8
<b>Compliance Monitoring Requirements</b>		
C.11	Compliance Monitoring	8
C.12	Monitoring Methods [326 IAC 3]	9
C.13	Compliance Monitoring Plan - Failure to Take Response Steps	9
C.14	Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18-1] [40 CFR 61.140]	10
<b>Record Keeping and Reporting Requirements</b>		
C.15	Emission Statement [326 IAC 2-6]	11
C.16	General Record Keeping Requirements	11
C.17	General Reporting Requirements	12
<b>Stratospheric Ozone Protection</b>		
C.18	Compliance with 40 CFR 82 and 326 IAC 22-1	13

**SECTION D.1 FACILITY OPERATION CONDITIONS ..... 14**

**Emission Limitations and Standards**

D.1.1 Particulate Matter (PM) [326 IAC 6-3-2(c)] ..... 14

D.1.2 Volatile Organic Compounds (VOC) ..... 14

**Compliance Determination Requirements**

D.1.3 Testing Requirements ..... 14

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

D.1.4 Record Keeping Requirements ..... 15

## SECTION A SOURCE SUMMARY

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

### A.1 General Information

---

The Permittee owns and operates a fiberglass reinforced plastic automotive parts production area.

Responsible Official: Richard K. Charville  
Source Address: 2620 Marion Drive, Kendallville, IN 46755  
Mailing Address: P.O. Box 728, Kendallville, IN 46755  
SIC Code: 3089  
County Location: Noble County  
County Status: Attainment for all criteria pollutants  
Source Status: State Construction and Operation Permit  
Major Source, under PSD Rules;  
Major Source, Section 112 of the Clean Air Act

### A.2 Emission Units and Pollution Control Equipment Summary

---

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

- (a) four (4) 1850 ton compression molding presses capable of handling a maximum of 1250 pounds of input sheet molding compound (SMC), designated Presses #8, #13, #14, and #15 and exhausting through general ventilation stacks RV01 and RV02 along with vacuum pump exhaust stack VS01.
- (b) a deflashing (grinding) operation for smoothing the molded parts exhausting through an existing dust collection system.

### A.3 Part 70 Applicability [326 IAC 2-7-2]

---

This stationary source, required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has submitted to the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM), a Part 70 (T113-6873-00018) application on October 10, 1996. The equipment being reviewed under this permit shall be incorporated in the submitted Part 70 application.

## Section B Construction Conditions

### General Construction Conditions [326 IAC 2-1-3]

#### B.1 Allowable Emissions

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).

#### B.2 General Rule Applicability

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.

#### B.3 Effective Date of the Permit [IC 13-15-5-3]

~~Pursuant to IC 13-15-5-3, Sections C and D.1 of this permit become effective upon its issuance.~~

#### B.4 Revocation of Permits [326 IAC 2-1-9(b)]

~~Pursuant to 326 IAC 2-1-9(b) (Revocation of Permits), IDEM, OAM, may revoke this section of the approved permit if construction is not commenced within eighteen (18) months after receipt of this permit or if construction is suspended for a continuous period of one (1) year or more.~~

#### B.5 Modification of Construction Conditions

~~Notwithstanding Condition B.6, all requirements of these construction conditions 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).~~

#### B.6 First Time Operation Permit [326 IAC 2-1-4]

~~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 2-7-19 (Fees).

## Section C Source Operation Conditions

Entire Source

### General Operation Conditions [326 IAC 2-1-4]

#### C.1 General Operation Conditions

- (a) 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).
- (b) 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.

#### C.2 Preventive Maintenance Plan [326 IAC 1-6-3]

~~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.

#### C.3 Transfer of Permit [326 IAC 2-1-6]

~~Pursuant to 326 IAC 2-1-6 (Transfer of Permits):~~

- (a) In the event that ownership of this fiberglass reinforced plastic molding operation 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.

#### C.4 Permit Revocation [326 IAC 2-1-9(a)]

~~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).

C.5 Availability of Permit [326 IAC 2-1-3(l)]

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, or other public official having jurisdiction.

---

C.6 Opacity Limitations [326 IAC 5-1-2]

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.

C.7 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.8 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

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.

---

C.9 Emergency Reduction Plans [326 IAC 1-5-2]

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

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

---

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 be accredited is federally enforceable.

**Compliance Monitoring Requirements**

**C.11 Compliance Monitoring**

---

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

**C.12 Monitoring Methods [326 IAC 3]**

---

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

**C.13 Compliance Monitoring Plan - Failure to Take Response Steps**

---

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
- (1) This condition;
  - (2) The Compliance Determination Requirements in Section D of this permit;
  - (3) The Compliance Monitoring Requirements in Section D of this permit;
  - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
  - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :
    - (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
    - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:

- (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;
  - (3) An automatic measurement was taken when the process was not operating; or
  - (4) The process has already returned to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken.

**C.14 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) The Permittee shall insure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
  - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
  - (2) If there is a change in the following:
    - (A) asbestos removal or demolition start date;
    - (B) removal or demolition contractor; or
  - (3) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

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

## **Record Keeping and Reporting Requirements**

### **C.15 Emission Statement [326 IAC 2-6]**

---

- (a) The Permittee shall submit a certified, annual emission statement that meets the requirements of 326 IAC 2-6 (Emission Reporting). This annual statement must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8) (Emission Statement Operating Year). The annual statement must be submitted to:  
  
Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015
- (b) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

### **C.16 General Record Keeping Requirements**

---

- (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 preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

#### C.17 General Reporting Requirements

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

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

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period.
- (e) All instances of deviations must be clearly identified in such reports. A reportable deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
  - (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
  - (2) A malfunction as defined in 326 IAC 1-6-2; or
  - (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
  - (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred or failure to monitor or record the required compliance monitoring is a deviation.
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

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

---

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

- (a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156
- (b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

## SECTION D.1 FACILITY OPERATION CONDITIONS

- (a) four (4) 1850 ton compression molding presses capable of handling a maximum of 1250 pounds of input sheet molding compound (SMC), designated Presses #8, #13, #14, and #15 and exhausting through general ventilation stacks RV01 and RV02 along with vacuum pump exhaust stack VS01.
- (b) a deflashing (grinding) operation for smoothing the molded parts exhausting through an existing dust collection system.

### Emission Limitations and Standards

#### D.1.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3 (Process Operations):

- (a) The existing dust collection system for particulate matter control shall be in operation at all times when the deflashing process is in operation.
- (b) The deflashing operation shall comply with 326 IAC 6-3-2(c) using one of the following equations:

$$E = 4.10P^{0.67} \quad \text{where: } E = \text{rate of emission in pounds per hour,}$$

P = process weight in tons per hour, if  
P is equal to or less than 60,000 lbs/hr (30 tons/hr)

or

$$E = 55.0P^{0.11} - 40 \quad \text{where: } E = \text{rate of emission in pounds per hour,}$$

P = process weight in tons per hour, if  
P is greater than 60,000 lbs/hr (30 tons/hr).

- (c) Inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

#### D.1.2 Volatile Organic Compounds (VOC)

~~Any change or modification which may increase potential VOC emissions to 25 tons per year~~  
from the equipment covered in this permit shall obtain approval from the OAM before such change may occur.

### Compliance Determination Requirements

#### D.1.3 Testing Requirements

Testing of these facilities are not specifically required by this permit. This does not preclude testing requirements on this facility under 326 IAC 2-7-5 and 326 IAC 2-7-6.

## **Record Keeping and Reporting Requirements**

### **D.1.4 Record Keeping Requirements**

---

- (a) Pursuant to 326 IAC 2-1-3(i)(8), records of sheet molding compound (SMC) usage and styrene composition shall be maintained in accordance with Section C, General Record Keeping Requirements, of this permit.
- (b) A log of information necessary to document compliance with Condition D.1.1 shall be maintained. All records shall be maintained in accordance with Section C, General Record Keeping Requirements, of this permit.

## Indiana Department of Environmental Management Office of Air Management

### Technical Support Document (TSD) for New Construction and Operation

#### Source Background and Description

Source Name: Budd Company Plastics Division, The  
Source Location: 2620 Marion Drive, Kendallville, IN 46755  
County: Noble  
Construction Permit No.: CP-113-9465-00018  
SIC Code: 3089  
Permit Reviewer: Janusz Johnson

The Office of Air Management (OAM) has reviewed an application from The Budd Company Plastics Division relating to the construction and operation of a fiberglass reinforced plastic automotive parts production area including:

- (a) four (4) 1850 ton compression molding presses capable of handling a maximum of 1250 pounds of input sheet molding compound (SMC), designated Presses #8, #13, #14, and #15 and exhausting through general ventilation stacks RV01 and RV02 along with vacuum pump exhaust stack VS01.
- (b) a deflashing (grinding) operation for smoothing the molded parts exhausting through an existing dust collection system.

#### Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
RVG01	general ventilation	30	2.5	10,000	85
RVG02	general ventilation	54	3.0	14,490	85
VS01	vacuum pump exhaust	53	0.3	300	70

#### 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 February 10, 1998.

#### 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)	3.5	3.5
Particulate Matter (PM10)	3.5	3.5
Sulfur Dioxide (SO <sub>2</sub> )	0.0	0.0
Volatile Organic Compounds (VOC)	21.4	21.4
Carbon Monoxide (CO)	0.0	0.0
Nitrogen Oxides (NO <sub>x</sub> )	0.0	0.0
Single Hazardous Air Pollutant (HAP)	21.4	21.4
Combination of HAPs	21.4	21.4

- (a) The potential emissions before control are the same as the allowable emissions, therefore, the allowable emissions are used for the permitting determination.
- (b) Allowable emissions (as defined in the Indiana Rule) of a single hazardous air pollutant (HAP) are greater than 10 tons per year. Therefore, pursuant to 326 IAC 2-1, a construction permit is required.

### County Attainment Status

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Noble County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Noble County has been classified as attainment or unclassifiable for all other regulated air pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

### Source Status

Existing Source PSD, Part 70 or FESOP Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/ or as otherwise limited):

Pollutant	Emissions (ton/yr)
VOC	249

- (a) 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.
- (b) These emissions were based on the construction permit, CP113-4116, issued January 27, 1995.

### Proposed Modification

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

Pollutant	PM (ton/yr)	PM10 (ton/yr)	SO <sub>2</sub> (ton/yr)	VOC (ton/yr)	CO (ton/yr)	NO <sub>x</sub> (ton/yr)
Proposed Modification	3.5	3.5	0.0	21.4	0.0	0.0
PSD Threshold Level	250	250	250	250	250	250

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 (T113-6873-00018) application on October 10, 1996. The equipment being reviewed under this permit shall be incorporated in the submitted Part 70 application.

### Federal Rule Applicability

- (a) There are no New Source Performance Standards (326 IAC 12), 40 CFR Part 60, applicable to these facilities.
- (b) There are no National Emissions Standards for Hazardous Air Pollutants, 40 CFR Part 63, applicable to these facilities.

### State Rule Applicability

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

These new compression molding presses, each of which is considered a "process or production unit" as defined in 40 CFR 63.41 (incorporated by reference in 326 IAC 2-1-3.4), are not subject to 326 IAC 2-1-3.4 (New Source Toxics Control) because the potential to emit (PTE) of combined hazardous air pollutants (HAPs) for each press is less than 25 tons per year and the potential to emit (PTE) of a single HAP for each press is less than 10 tons per year (see Appendix A of the TSD for detailed calculations).

326 IAC 2-6 (Emission Reporting)

This facility is subject to 326 IAC 2-6 (Emission Reporting), because the source emits more than 100 tons per year 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 July 1 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)

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.

326 IAC 6-3-2 (Particulate Emissions Limitations for Process Operations)

No person shall operate a facility such that particulate matter is emitted in excess of the pound per hour limit calculated as follows according to part (c) of the rule:

for "P" less than 30 tons per hour:  $E = 4.10 * P^{0.67}$

- or -

for "P" greater than 30 tons per hour:  $E = 55.0 * P^{0.11} - 40$

where: "E" is the emission rate limit in pounds per hour, and  
"P" is the process throughput in tons per hour.

Due to variability in the number, size, and weight of units deflashed (ground), no emissions rate limit has been calculated for the deflashing operation. This operation will be assumed to comply with the rule provided the existing dust collection system is operating at all times that the deflashing operation is finishing parts.

326 IAC 8-1-6 (General Provisions Relating to VOC Rules)

The provisions of this rule do not apply because the potential to emit volatile organic compounds (VOC) from the four (4) compression molding presses is less than 25 tons per year.

No other 326 IAC 8 rules apply.

**Air Toxic Emissions**

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

- (a) This proposed fiberglass reinforced plastic molding operation 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:

Air Toxic Emissions

Pollutant	Rate (lb/hr)	Rate @ 8760 hr/yr (ton/yr)	Modeled Concentration (Fg/m <sup>3</sup> )	OSHA PEL (Fg/m <sup>3</sup> )	% OSHA PEL
Styrene	4.88	21.40	553.8	420000.0	0.1300
TOTAL HAPs	-	21.40	-	-	-

Methodology:

Rate ton/yr = (rate lb/hr)\*(hr/yr of operation)

Air Toxic Stacks

Stack ID	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
RVG01 (Group of 27 roof vents)	30-53	2.5	10,000	85
RVG02 (Group of 4 vents)	54	3.0	14,490	85
VS01 (Group of 4 vents)	53	0.3	300	70

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.

- (b) See attached spreadsheets for detailed air toxic calculations.

## Conclusion

The construction of this fiberglass reinforced plastic automotive parts production area will be subject to the conditions of the attached proposed **Construction Permit No. CP-113-9465-00018**.

**Appendix A: Emissions Calculations**  
**Emissions from Closed Molding operation**

<b>Company Name:</b>	<b>Budd Company Plastics Division</b>	<b>CP#:</b>	<b>113-9465</b>
<b>City, Indiana:</b>	<b>Kendallville, Indiana</b>	<b>Plt ID:</b>	<b>113-00018</b>
<b>Reviewer:</b>	<b>Janusz Johnson</b>		
<b>Date:</b>	<b>March 25, 1998</b>		

**four (4) 1850 ton compression molding presses**

Maximum styrene containing material usage:	1250.00 lb/hr
Maximum styrene content (weight %):	13.00%
Weight percent starting monomer emitted (based on AP-42 4.4-7):	3.00%

Potential Emissions (lb/hr) = styrene containing material usage \* weight percent styrene \* weight percent emitted = 4.88 lb styrene/hr

Potential Emissions (lb/day) = Emissions (lb/hr) \* 24 hour per day = 117.00 lb styrene/day

Potential Emissions (ton/year) = Emissions (lb/day) \* 365 days per year / 2000 pounds per ton = 21.35 ton styrene/yr

326 IAC 2-1-3.4 (New source toxics control) applicability: Because each of the four (4) presses acts independently, each is considered a separate facility. The presses are each capable of 1/4 of the total emissions, or 5.3 tons per year. Because each press has potential emissions of styrene (single HAP) less than 10 tons per year, 326 IAC 2-1-3.4 does not apply.

**deflashing (grinding) operation attached to existing, permitted, dust collection system**

It is anticipated that the PM emissions from the finishing of the molded pieces will be 0.8 pounds per hour

Potential Emissions (lb/hr) = 0.8 pounds PM per hour \* 8760 hours per year / 2000 pounds per ton = 3.50 tons PM/yr

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

Budd Company Plastics Division, The  
P.O. Box 728  
Kendallville, Indiana 46755

**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 The Budd Company Plastics Division, has constructed the fiberglass reinforced plastics molding area in conformity with the requirements and intent of the construction permit application received by the Office of Air Management on February 10, 1998, and as permitted pursuant to **Construction Permit No. CP-113-9465, Plant ID No. 113-00018** issued on \_\_\_\_\_.

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)