

**CONSTRUCTION PERMIT
OFFICE OF AIR MANAGEMENT**

**Ranch Fiberglass, Inc.
28564 Holiday Place
Elkhart, Indiana 46517**

is hereby authorized to construct

- (a) Two (2) high volume low pressure (HVLP) spray guns for coating rails in the area identified as EU-14, using dry filters for overspray control, and exhausting through one (1) stack, identified as SV-20;
- (b) Four (4) air atomization spray guns in the Mold Shop area, identified as EU-10, and exhausting through one (1) stack, identified as SV-16;
- (c) One (1) drying room for existing base coat booths, identified as EU-5, and exhausting through one (1) stack, identified as SV-9;
- (d) One (1) natural gas fired drying room combustion unit, identified as EU-6, rated at 2.0 million British thermal units (mmBtu) per hour, and exhausting through one (1) stack, identified as SV-10;
- (e) One (1) natural gas fired bake room combustion unit, identified as EU-8, rated at 2.0 million British thermal units (mmBtu) per hour, and exhausting through two (2) stacks, identified as SV-13 and SV-14;
- (f) One (1) paint mixing room, identified as EU-9, exhausting through one (1) stack, identified as SV-15;
- (g) Two (2) 200 gallon resin mixing tanks, identified as Mix-1 and Mix-2; and
- (h) One 6,000 gallon resin holding tank, identified as RT-1.

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-039-9503-00110	
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 26 IAC 2-7-19 (Fees)
 - (e) The Permittee has submitted their Part 70 permit (T-039-6172-00110) on June 20, 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 this RV and truck fiberglass caps manufacturer 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, (local agency if applicable) or other public official having jurisdiction.

Malfunction Condition

7. That pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):
- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) or appointed representative upon request.
 - (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAM, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
 - (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
 - (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

Annual Emission Reporting

8. 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
Technical Support and Modeling Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

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

Opacity Limitations

9. 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.

Fugitive Dust Emissions

10. That pursuant to 326 IAC 6-4 (Fugitive Dust Emissions), the permittee shall be in violation of 326 IAC 6-4 (Fugitive Dust Emissions) 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)].

Volatile Organic Compounds (VOC)

11. Total VOC usages (usages include 12.7% of resin usage, 21.1% of gel coat usage, and other VOC input) from the equipment covered in this permit shall be limited to 24 tons per 12 month period. During the first 12 months of operation, VOC usage shall be limited such that the total VOC used divided by accumulated months of operation shall not exceed the limit specified. Therefore, 326 IAC 8-1-6 will not apply.

Hazard Air Pollutant (HAP)

12. Usages of any single HAP and any combination of HAPs (usages include 12.7% of resin usage, 21.1% of gel coat usage, and other HAPs input) from the equipment covered in this permit shall be limited to 9.9 and 24 tons per 12 month period, respectively. During the first 12 months of operation, HAPs usage shall be limited such that the total HAPs used divided by accumulated months of operation shall not exceed the limits specified. Therefore, 326 IAC 2-1-3.4 will not apply.

Particulate Matter (PM)

13. That pursuant to 326 IAC 6-3 (Process Operations):
- (a) The dry filters for particulate matter overspray control shall be in operation at all times when the rail coating spray guns are in operation.
 - (b) The rail coating operation and Mold Shop area shall comply with 326 IAC 6-3-2(c) using the following equation:

(use this equation if P is equal to or less than 60,000 lbs/hr (30 tons/hr)):

$$E = 4.10P^{0.67}$$
 where: E = rate of emission in pounds per hour,
P = process weight in tons per hour.
 - (c) Daily inspections shall be performed to verify the placement, integrity and particulate loading of the filters.

Open Burning

14. 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

15. 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.

(g) 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]

**Indiana Department of Environmental Management
 Office of Air Management
 Compliance Data Section**

Quarterly Report

Company Name: Ranch Fiberglass, Inc.
 Location: 28564 Holiday Place, Elkhart, Indiana 46517
 Permit No.: CP-039-9503-00110
 Source: Rail Coating and Mold Shop
 Pollutant: VOC, single HAP, and total HAPs
 Limit: 24, 9.9 and 24 tons/12 month period, respectively. During the first 12 months of operation, VOC/HAPs usage shall be limited such that the total VOC/HAPs used divided by accumulated months of operation shall not exceed the limits specified. (based on 12.7% of resin usage, 21.1% of gel coat usage, and other VOC/HAPs input)

Year: _____

Month		VOC Usage/Emissions (tons/month)	Single HAP Usage/Emissions (tons/month)	Total HAP Usage/Emissions (tons/month)
Month 1	This Month			
	Previous 11 Months			
	12 Month Total			
Month 2	This Month			
	Previous 11 Months			
	12 Month Total			
Month 3	This Month			
	Previous 11 Months			
	12 Month Total			

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

MALFUNCTION REPORT

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
FAX NUMBER - (317) 233-5967**

**This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6
and to qualify for the exemption under 326 IAC 1-6-4.**

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE: IT HAS POTENTIAL TO EMIT 25 LBS/HR PARTICULATES ? _____, 100 LBS/HR VOC ? _____, 100 LBS/HR SULFUR DIOXIDE ? _____ OR 2000 LBS/HR OF ANY OTHER POLLUTANT ? _____ EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _____ OR, PERMIT CONDITION # _____ AND/OR PERMIT LIMIT OF _____

THIS INCIDENT MEETS THE DEFINITION OF 'MALFUNCTION' AS LISTED ON THE NEXT PAGE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY: Ranch Fiberglass, Inc. PHONE NO. (219)-294-7550
LOCATION: (CITY AND COUNTY) Elkhart, Elkhart County
PERMIT NO. 039-9503 AFS PLANT ID: 039-00110 AFS POINT ID: _____ INSP: Greg Wingstrom
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: _____

DATE/TIME MALFUNCTION STARTED: ____/____/19____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION

CONDITION:

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE ____/____/19____ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER: _____

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS: _____

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____

INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

MALFUNCTION REPORTED BY:

TITLE: _____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

Indiana Department of Environmental Management Office of Air Management

Technical Support Document (TSD) for New Construction and Operation

Source Background and Description

Source Name: Ranch Fiberglass, Inc.
Source Location: 28564 Holiday Place, Elkhart, Indiana 46517
County: Elkhart
Construction Permit No.: CP-039-9503-00110
SIC Code: 3089
Permit Reviewer: Scott Pan/EVP

The Office of Air Management (OAM) has reviewed an application from Ranch Fiberglass, Inc. relating to the construction and operation of the modification to a RV and truck fiberglass caps manufacturer, consisting of the following equipment:

- (a) Two (2) high volume low pressure (HVLP) spray guns for coating rails in the area identified as EU-14, using dry filters for overspray control, and exhausting through one (1) stack, identified as SV-20;
- (b) Four (4) air atomization spray guns in the Mold Shop area, identified as EU-10, and exhausting through one (1) stack, identified as SV-16;
- (c) One (1) drying room for existing base coat booths, identified as EU-5, and exhausting through one (1) stack, identified as SV-9;
- (d) One (1) natural gas fired drying room combustion unit, identified as EU-6, rated at 2.0 million British thermal units (mmBtu) per hour, and exhausting through one (1) stack, identified as SV-10;
- (e) One (1) natural gas fired bake room combustion unit, identified as EU-8, rated at 2.0 million British thermal units (mmBtu) per hour, and exhausting through two (2) stacks, identified as SV-13 and SV-14;
- (f) One (1) paint mixing room, identified as EU-9, exhausting through one (1) stack, identified as SV-15;
- (g) Two (2) 200 gallon resin mixing tanks, identified as Mix-1 and Mix-2; and
- (h) One 6,000 gallon resin holding tank, identified as RT-1.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
SV-20	Rail Spray	3	1.6	1,200	Ambient
SV-16	Mold Shop	5	2.5	8,300	Ambient
SV-9	Drying Room	24	1.0	1,200	Ambient
SV-10	Drying Room Combustion Unit	24	0.7	800	77
SV-13	Bake Room	24	1.6	5,400	77
SV-14	Combustion Unit	24	1.6	5,400	77
SV-15	Paint Mix Room	23	0.75	600	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 February 20, 1998, with additional information received on April 6, April 21, and April 30, 1998.

Emissions Calculations

See Appendix A (Emissions Calculation Spreadsheets) for detailed calculations (four (4) pages).

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 (PM10)	---	44.7
Sulfur Dioxide (SO ₂)	---	0.0
Volatile Organic Compounds (VOC)	---	37.6
Carbon Monoxide (CO)	---	0.4
Nitrogen Oxides (NO _x)	---	1.8
Single Hazardous Air Pollutant (HAP)	---	29.2
Combination of HAPs	---	32.0

- (a) Allowable emissions (as defined in the Indiana Rule) of VOC and PM-10 are greater than 25 tons per year. Therefore, pursuant to 326 IAC 2-1, Sections 1 and 3, a construction permit is required.

- (b) Allowable emissions (as defined in the Indiana Rule) 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.

County Attainment Status

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NOx) are precursors for the formation of ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Fugitive Emissions
 Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive PM emissions are not counted toward determination of PSD applicability.

Source Status

Existing Source PSD Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity):

Pollutant	Emissions (ton/yr)
PM-10	0.6
SO ₂	0.0
VOC	228.0
CO	0.0
NO _x	0.0

- (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.

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 ₂ (ton/yr)	VOC (ton/yr)	CO (ton/yr)	NO _x (ton/yr)
Proposed Modification	6.0	6.0	0.0	12.8	0.4	1.6
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 (T-039-6172-00110) application on June 20, 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), 40 CFR Part 60 and National Emission Standards for Hazardous Air Pollutants (NESHAPs), 40 CFR Part 63 applicable to this facility.

State Rule Applicability

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

Pursuant to 326 IAC 2-1-3.4 (New Source Toxics Control), any new process or production unit, which in and of itself emits or has the potential to emit (PTE) 10 tons per year of any HAP or 25 tons per year of any combination of HAPs, must be controlled using technologies consistent with Maximum Achievable Control Technology (MACT). The proposed modification limits the PTE single HAP to less than 10 tons per year and total HAPs to 24 tons per year. Therefore, the proposed modification is not subject to the requirements of 326 IAC 2-1-3.4.

326 IAC 2-6 (Emission Reporting)

This facility is subject to 326 IAC 2-6 (Emission Reporting), because the source is located in Elkhart 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 source is subject to 326 IAC 5-1-2 (Visible Emission Limitations) which limits visible emissions from a source or facility located in either attainment or nonattainment counties. Pursuant to 326 IAC 5-1-2 (1), visible emissions shall meet the following limitations:

- (a) visible emissions shall not exceed an average of forty percent (40%) opacity in twenty-four (24) consecutive readings, when located in a particulate matter attainment area; and
- (b) visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes in a six hour period.

326 IAC 6-4 (Fugitive Dust Emissions)

Pursuant to 326 IAC 6-4, fugitive dust shall not be visible crossing the boundary or property line of a source. Observances of visible emissions crossing property lines may be refuted by factual data expressed in 326 IAC 6-4-2(1), (2) or (3).

326 IAC 6-3-2 (Process Operations)

Pursuant to 326 IAC 6-3-2 (Process Operations), particulate matter (PM) overspray from the rail coating operation and Mold Shop area shall be limited by the following:

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

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

or

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

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

The particulate matter emissions from the rail coating operation will be in compliance with 326 IAC 6-3-2 by using air filters for overspray control at all times when the rail coating is in operation.

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. By limiting single HAP (styrene) to less than 10 tons per year, VOC emissions for the equipment covered in this modification are also limited to less than 24 tons per year. Therefore, the requirements of 326 IAC 8-1-6 do not apply.

No other article 8 rules apply to the equipment covered in this modification.

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

Conclusion

The construction of this modification to a RV and truck fiberglass caps manufacturer will be subject to the conditions of the attached proposed **Construction Permit No. CP-039-9503-00110**.

Indiana Department of Environmental Management Office of Air Management

Addendum to the Technical Support Document for New Construction and Operation

Source Name: Ranch Fiberglass, Inc.
 Source Location: 28564 Holiday Place, Elkhart, Indiana 46517
 County: Elkhart
 Construction Permit No.: CP-039-9503-00110
 SIC Code: 3089
 Permit Reviewer: Scott Pan/EVP

On June 4, 1998, the Office of Air Management (OAM) had a notice published in the Elkhart Truth, Elkhart, Indiana, stating that Ranch Fiberglass, Inc. had applied for a construction permit to construct and operate the modification to a RV and Truck fiberglass caps manufacturer with control. The notice also stated that OAM proposed to issue a permit for this installation 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.

Upon further review, the OAM has decided to make the following changes to the proposed permit:

The styrene emissions from the gel coat and resin applications at the source were re-calculated using the emission factors recently submitted to the U.S. EPA (based on the CFA Emissions Models) for use as the new AP-42 emission factors. The calculated emissions are presented in the revised Appendix A, Pages 1, 2 and 3. Based on the emission factors used, Operation Conditions 11 and 12 (page 5 of 9) are revised as follows:

- Volatile Organic Compounds (VOC)
11. Total VOC usages (usages include ~~25.9% flashoff for resin input~~ **12.7% of resin usage**, ~~52.1% flashoff for gel coat input~~ **21.1% of gel coat usage**, and other VOC input) from the equipment covered in this permit shall be limited to ~~2 tons per month~~ **24 tons per 12 month period**. **During the first 12 months of operation, VOC usage shall be limited such that the total VOC used divided by accumulated months of operation shall not exceed the limit specified.** Therefore, 326 IAC 8-1-6 will not apply.
- Hazard Air Pollutant (HAP)
12. Usages of any single HAP and any combination of HAPs (usages include ~~25.9% flashoff for resin input~~ **12.7% of resin usage**, ~~52.1% flashoff for gel coat input~~ **21.1% of gel coat usage**, and other HAPs input) from the equipment covered in this permit shall be limited to 9.9 and 24 tons per 12 month period, respectively. **During the first 12 months of operation, HAPs usage shall be limited such that the total HAPs used divided by accumulated months of operation shall not exceed the limits specified.** Therefore, 326 IAC 2-1-3.4 will not apply.

Additionally, the 'Limit' in the Quarterly Report form (page 7 of 9) has been revised as follows:

Limit: 24, 9.9 and 24 tons/12 month period, respectively. **During the first 12 months of operation, VOC/HAPs usage shall be limited such that the total VOC/HAPs used divided by accumulated months of operation shall not exceed the limits specified.** (based on ~~25.9% flashoff for resin input~~ **12.7% of resin usage**, ~~52.1% flashoff for gel coat input~~ **21.1% of gel coat usage**, and other VOC/HAPs input)

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

Ranch Fiberglass, Inc.
28564 Holiday Place
Elkhart, Indiana 46517

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 Ranch Fiberglass, Inc., 28564 Holiday Place, Elkhart, Indiana, 46517, has constructed the modification to a RV and truck fiberglass caps manufacturer in conformity with the requirements and intent of the construction permit application received by the Office of Air Management on Feb. 20, 1998 and as permitted pursuant to **Construction Permit No. CP-039-9503, Plant ID No. 039-00110** issued on _____
5. I hereby certify that Ranch Fiberglass, Inc. has submitted a Title V operating permit application (T-039-6172-00110) on June 20, 1996, and that the equipment being reviewed under this permit shall be incorporated in the submitted Title V operating permit application.

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)

**Appendix A: Emission Calculations
Emission Summary**

**Company Name: Ranch Fiberglass, Inc.
Address City IN Zip: 28564 Holiday Place, Elkhart, IN 46517
CP: CP039-9503
Plt ID: 039-00110
Reviewer: Scott Pan/EVP
Date: July 5, 1998**

Uncontrolled Potential Emissions (tons/year)

Emissions Generating Activity			
Pollutant	Fiberglass Processing	Natural Gas Combustion	TOTAL
PM	44.5	0.2	44.7
PM10	44.5	0.2	44.7
SO2	0.0	0.0	0.0
NOx	0.0	1.8	1.8
VOC	41.4	0.1	41.5
CO	0.0	0.4	0.4
total HAPs	36.0	0.0	36.0
worst single HAP (styrene)	33.1	0.0	33.1

Total emissions based on rated capacity at 8,760 hours/year.

Limited/Controlled Emissions (tons/year)

Emissions Generating Activity			
Pollutant	Fiberglass Processing	Natural Gas Combustion	TOTAL
PM	4.1	0.2	4.3
PM10	4.1	0.2	4.3
SO2	0.0	0.0	0.0
NOx	0.0	1.8	1.8
VOC	12.4	0.1	12.5
CO	0.0	0.4	0.4
total HAPs	10.9	0.0	10.9
worst single HAP (styrene)	9.9	0.0	9.9

**Appendix A: Emissions Calculations
Reinforced Plastics and Composites Fiberglass Process**

**Company Name: Ranch Fiberglass, Inc.
Address City IN Zip: 28564 Holiday Place, Elkhart, IN 46517
CP: CP039-9503
Plt ID: 039-00110
Reviewer: Scott Pan/EVP
Date: July 5, 1998**

Emissions Calculations

Material	Density (lb/gal)	Weight % VOC	Gallons per unit	Units per hour	Pound VOC per hour	Pounds VOC per day	Tons of VOC per Year	PM tons per year	Flash off (%)	Transfer Efficiency
EU-10, Mold Shop										
Gel Coat	10.50	39.2%	3.0	0.074	0.49	11.80	2.15	3.10	21.10%	50.00%
Resin	9.00	43.0%	16.0	0.074	1.35	32.48	5.93	13.30	12.70%	50.00%
Catalyst	9.03	98.50%	0.113	0.074	0.07	1.79	0.33	0.00	100.00%	100.00%
41-90	6.54	100.00%	0.0012	0.074	0.00	0.01	0.00	0.00	100.00%	100.00%
Cleaner	6.35	100.00%	0.0650	0.074	0.03	0.73	0.13	0.00	100.00%	100.00%
EU-14, Rail Spray Guns										
Resin	9.00	43.0%	1.0	5.000	5.72	137.16	25.03	28.09	12.70%	75.00%
Catalyst	9.03	98.50%	0.040	5.000	1.78	42.69	7.79	0.00	100.00%	100.00%

Potential Emissions:

9.4 226.7 41.4 44.5

Limited/Controlled Emissions:

(Styrene emissions from gel coat and resin spray operations are limited to 9.9 ton/yr,
PM emissions in EU-14 are controlled by a 97% efficiency air filter)

12.4 4.1

METHODOLOGY

Potential VOC Pounds per Hour (for non-Gel Coat or non-Resin) = Density (lb/gal)* Weight % Monomer * Gal of Material (gal/unit) * Maximum (unit/hr) * Flash off (%)
 Potential VOC Pounds per Hour (for non-Gel Coat or non-Resin) =Density (lb/gal)* Weight % Monomer * Gal of Material (gal/unit) * Maximum (unit/hr) * Flash off (%)
 Potential VOC Pounds per Day =Density (lb/gal)* Weight % Monomer * Gal of Material (gal/unit) * Maximum (unit/hr) * (24 hrs / 1 day) * Emission factor
 Potential VOC Tons per Year = Density (lb/gal)* Weight % Monomer * Gal of Material (gal/unit) * Maximum (unit/hr) * (8760 hr/yr) * (1 ton / 2000 lbs) * Emission factor
 Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1 - Weight % Volatiles) * (1 - Transfer efficiency) * (8760 hr/yr) * (1 ton / 2000 lbs)
 Total = Sum of all worst case coatings and solvents used
 Flash Off Factor (%) = calculated % flash off or minimum flash off, whichever is greater from above tabulation

HAP Emission Calculations

Company Name: Ranch Fiberglass, Inc.
Address City IN Zip: 28564 Holiday Place, Elkhart, IN 46517
CP: CP039-9503
Plt ID: 039-00110
Reviewer: Scott Pan/EVP
Date: July 5, 1998

Material	VOC Emissions (ton/yr)	Weight % VOC	Weight % Styrene	Weight % Dimethyl Phthalate	Weight % MEK	Styrene Emissions (ton/yr)	Dimethyl Phthalate Emissions (ton/yr)	MEK Emissions (ton/yr)
Gel Coat	0.64	39.23%	39.23%	0.00%	0.00%	0.64	0.00	0.00
Resin	9.26	43.00%	43.00%	0.00%	0.00%	9.26	0.00	0.00
Catalyst	2.75	98.50%	0.00%	32.00%	3.00%	0.00	0.89	0.08
41-90	0.00	100.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00
Cleaner	0.04	100.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00

Limited Emissions

9.9

0.9

0.1

Methodology

HAPS emission rate (tons/yr) = Weight % HAP / Weight % VOC * VOC Emissions (tons/yr)

**Appendix A: Emission Calculations
Natural Gas Combustion
MM Btu/hr 0.3 - < 10**

**Company Name: Ranch Fiberglass, Inc.
Address City IN Zip: 28564 Holiday Place, Elkhart, IN 46517
CP: CP039-9503
Plt ID: 039-00110
Reviewer: Scott Pan/EVP
Date: April 30, 1998**

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

4.0

35.0

Heat Input Capacity includes:
2 - 2 mmBtu/hr combustion units

	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	11.9	11.9	0.6	100.0	5.8	21.0
Potential Emission in tons/yr	0.21	0.21	0.01	1.75	0.10	0.37

Methodology:

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors for NOx: uncontrolled = 100, Low Nox Burner = 17, Flue gas recirculation = 36

Emission Factors for CO: uncontrolled = 21, Low NOx burner = 15, Flue Gas Recirculation = ND.

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-03-006-03

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton