NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

Preliminary Findings Regarding a Significant Modification to a Part 70 Operating Permit

for Patrick Industries, Inc. dba Frontline Manufacturing in Kosciusko County

Significant Source Modification No.: 085-41958-00077
Significant Permit Modification No.: 085-41960-00077

The Indiana Department of Environmental Management (IDEM) has received an application from Patrick Industries, Inc. dba Frontline Manufacturing located at 1445 Polk Drive, Warsaw, Indiana 46580, for a significant modification of its Part 70 Operating Permit issued on November 23, 2016. If approved by IDEM’s Office of Air Quality (OAQ), this proposed modification would allow Patrick Industries, Inc. dba Frontline Manufacturing to make certain changes at its existing source. Patrick Industries, Inc. dba has applied to replace four (4) non-atomized gel coat guns with four (4) new mechanical lesser atomized (LVLP) gel coat guns, add two (2) new mechanical lesser atomized gel coat guns, replace the resin tank T3 and remove four (4) portable gel coat guns from booths SG3 and SG5. The source also requested for administrative changes in the descriptive information and the removal of some insignificant activities.

The applicant intends to construct and operate new equipment that will emit air pollutants; therefore, the permit contains new or different permit conditions. In addition, some conditions from previously issued permits/approvals have been corrected, changed, or removed. These corrections, changes, and removals may include Title I changes (e.g. changes that add or modify synthetic minor emission limits). IDEM has reviewed this application and has developed preliminary findings, consisting of a draft permit and several supporting documents, which would allow the applicant to make this change.

A copy of the permit application and IDEM’s preliminary findings are available at:

Warsaw Community Public Library
310 E Main St
Warsaw, Indiana 46580

and

IDEM Northern Regional Office
300 North Dr. Martin Luther King Jr. Boulevard, Suite 450
South Bend, IN 46601-1295

A copy of the preliminary findings is available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/. A copy of the preliminary findings is also available via IDEM’s Virtual File Cabinet (VFC.) Please go to: http://www.in.gov/idem/ and enter VFC in the search box. You will then have the option to search for permit documents using a variety of criteria.

How can you participate in this process?

The date that this notice is posted on IDEM’s website (https://www.in.gov/idem/5474.htm) marks the beginning of a 30-day public comment period. If the 30th day of the comment period falls on a day when IDEM offices are closed for business, all comments must be postmarked or delivered in person on the next business day that IDEM is open.
You may request that IDEM hold a public hearing about this draft permit. If adverse comments concerning the air pollution impact of this draft permit are received, with a request for a public hearing, IDEM will decide whether or not to hold a public hearing. IDEM could also decide to hold a public meeting instead of, or in addition to, a public hearing. If a public hearing or meeting is held, IDEM will make a separate announcement of the date, time, and location of that hearing or meeting. At a hearing, you would have an opportunity to submit written comments and make verbal comments. At a meeting, you would have an opportunity to submit written comments, ask questions, and discuss any air pollution concerns with IDEM staff.

Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so that you can be added to IDEM's mailing list to receive notice of future action related to this permit. If you do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit number SSM 085-41958-00077 and SPM 085-41960-00077 in all correspondence.

Comments should be sent to:

Wilfredo de la Rosa
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for Wilfredo de la Rosa or (317) 232-8422
Or dial directly: (317) 232-8422
Fax: (317) 232-6749 attn: Wilfredo de la Rosa
E-mail: wdelaros@idem.IN.gov

All comments will be considered by IDEM when we make a decision to issue or deny the permit. Comments that are most likely to affect final permit decisions are those based on the rules and laws governing this permitting process (326 IAC 2), air quality issues, and technical issues. IDEM does not have legal authority to regulate zoning, odor, or noise. For such issues, please contact your local officials.

For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Air Permits page on the Internet at: http://www.in.gov/idem/airquality/2356.htm; and the Citizens’ Guide to IDEM on the Internet at: http://www.in.gov/idem/6900.htm.

What will happen after IDEM makes a decision?

Following the end of the public comment period, IDEM will issue a Notice of Decision stating whether the permit has been issued or denied. If the permit is issued, it may be different than the draft permit because of comments that were received during the public comment period. If comments are received during the public notice period, the final decision will include a document that summarizes the comments and IDEM’s response to those comments. If you have submitted comments or have asked to be added to the mailing list, you will receive a Notice of the Decision. The notice will provide details on how you may appeal IDEM’s decision, if you disagree with that decision. The final decision will also be available on the Internet at the address indicated above, at the local library indicated above, at the IDEM Regional Office indicated above, and the IDEM public file room on the 12th floor of the Indiana Government Center North, 100 N. Senate Avenue, Indianapolis, Indiana 46204-2251.

If you have any questions, please contact Wilfredo de la Rosa of my staff at the above address.

Josiah K. Balogun, Section Chief
Permits Branch
Office of Air Quality
Mr. Tony Swihart  
Patrick Industries, Inc. dba Frontline Manufacturing  
1445 Polk Drive  
Warsaw, Indiana 46580

Re: 085-41960-00077  
Significant Permit Modification

Dear Mr. Swihart:

Patrick Industries, Inc. dba Frontline Manufacturing was issued Part 70 Operating Permit Renewal No. T085-37492-00077 on November 23, 2016 for a stationary fiberglass products (shower tubs) manufacturing facility located at 1445 Polk Drive, Warsaw, Indiana 46580. An application requesting changes to this permit was received on September 23, 2019. Pursuant to the provisions of 326 IAC 2-7-12, a Significant Permit Modification to this permit is hereby approved as described in the attached Technical Support Document.

Please find attached the entire Part 70 Operating Permit as modified. The permit references the below listed attachment. Since this attachment has been provided in previously issued approvals for this source, IDEM OAQ has not included a copy of this attachment with this modification:

Attachment A: 40 CFR 63, Subpart WWWW, NESHAP for Reinforced Plastic Composites Production

Previously issued approvals for this source containing this attachment are available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/.

Previously issued approvals for this source are also available via IDEM’s Virtual File Cabinet (VFC.) Please go to: http://www.in.gov/idem/ and enter VFC in the search box. You will then have the option to search for permit documents using a variety of criteria.


A copy of the permit is available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/. A copy of the permit is also available via IDEM’s Virtual File Cabinet (VFC.) Please go to: http://www.in.gov/idem/ and enter VFC in the search box. You will then have the option to search for permit documents using a variety of criteria. For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Air Permits page on the Internet at: http://www.in.gov/idem/airquality/2356.htm; and the Citizens’ Guide to IDEM on the Internet at: http://www.in.gov/idem/6900.htm.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5.
If you have any questions regarding this matter, please contact Wilfredo de la Rosa, Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251, or by telephone at (317) 232-8422 or (800) 451-6027, and ask for Wilfredo de la Rosa or (317) 232-8422.

Sincerely,

Josiah K. Balogun, Section Chief
Permits Branch
Office of Air Quality

Attachments: Modified Permit and Technical Support Document
cc: File - Kosciusko County
Kosciusko County Health Department
U.S. EPA, Region 5
Compliance and Enforcement Branch
IDEM Northern Regional Office
Part 70 Operating Permit (Renewal)
OFFICE OF AIR QUALITY

Patrick Industries, Inc. dba Frontline Manufacturing
1445 Polk Drive
Warsaw, Indiana 46580

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

The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.
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Pursuant to 326 IAC 6-3-2(d), particulate emissions from the gel coat applicators in SG3 and SG5 shall be controlled by a particulate filter, waterwash, or an equivalent control device, and the source shall operate it in accordance with the manufacturer’s specifications.
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CERTIFICATION

EMERGENCY OCCURRENCE REPORT

Part 70 Quarterly Report

Part 70 Quarterly Report

PART 70 OPERATING PERMIT

QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

SECTION A  SOURCE SUMMARY

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

A.1  General Information [326 IAC 2-7-4(c)][326 IAC 2-7-5(14)][326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary fiberglass products (shower tubs) manufacturing operation.

Source Address: 1445 Polk Drive, Warsaw, Indiana 46580
General Source Phone Number: 574-453-2902
SIC Code: 3088 (Plastics Plumbing Fixtures)
County Location: Kosciusko
Source Location Status: Attainment for all criteria pollutants
Source Status: Part 70 Operating Permit Program
Minor Source, under PSD Rules
Major Source, Section 112 of the Clean Air Act
Not 1 of 28 Source Categories

A.2  Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)][326 IAC 2-7-5(14)]

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

Line 1:
(a) One (1) fiberglass production line, identified as Line 1, installed in February 1998, approved for modification in 2014, moved in 2017 with a maximum production rate of 15 fiberglass units per hour, including:

(1) One (1) chop resin application booth, identified as SG1, consisting of:
   (A) one (1) non-atomized fluid impingement chop gun, identified as SG1A, installed in February 1998, and
   (B) one (1) non-atomized fluid impingement chop gun, identified as SG1B, approved for installation in 2014.
   (C) one (1) non-atomized fluid impingement chop gun, identified as SG1C, approved in 2018 for construction.

   This chop resin application booth is equipped with dry filters for particulate control exhausting to one (1) stack identified as SG1X.

(2) One (1) gel coat application booth, identified as SG3, consisting of three (3) stationary mechanical lesser atomized applicators, approved in 2019 for construction, exhausting to one (1) stack identified as SG3X. The booth is also equipped with dry filters for particulate control.

   [Under 40 CFR 63, Subpart WWWW, this line 1 is considered an affected source.]

(b) Fiberglass Cutting Operations, controlled by dust collector identified as DC1, exhausting
outdoors through stack DC1S, consisting of the following:

(1) One (1) trim booth, identified as T1, constructed in 1998, and moved to Line 1 in 2017, utilizing:
   (A) Two (2) trimmer saws, each with a throughput capacity of 969 pounds per hour; and
   (B) Two (2) hand grinders, each with a throughput capacity of 969 pounds per hour.

(2) One (1) saw room, identified as SR1, approved in 2017 for construction. This saw room consists of:
   (A) One (1) table saw, with a maximum capacity of 200 pounds of wood per hour, controlled by dust collector, identified as DC2, venting indoors; and
   (B) One (1) radial saw, with a maximum capacity of 200 pounds of wood per hour, controlled by dust collector, identified as DC3, venting indoors.

Line 2 (relocated to 1445 Polk Drive, Warsaw, IN in 2018):
   (c) One (1) fiberglass production line, identified as Line 2, installed in July 1999, with a maximum production rate of 30 fiberglass units per hour, including:

   (1) One (1) chop resin application booth, consisting of three (3) non-atomized fluid impingement chop guns, identified as SG7, SG8, and SG9, producing up to 30 fiberglass units per hour per gun, and exhausting to seven (7) stacks identified as SG7X, SG8X, SG9X, SG2XA-SG2XD. The booth is also equipped with dry filters for particulate control.

   (2) One (1) gel coat application booth, identified as SG5, consisting of three (3) stationary mechanical lesser atomized applicators, approved in 2019 for construction, exhausting to one (1) stack identified as SG5X. The booth is also equipped with dry filters for particulate control.

[Under 40 CFR 63, Subpart WWWW, this line 2 is considered an affected source.]

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-7-4(c)][326 IAC 2-7-5(14)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

Line 1:
   (a) Cleaners and solvents with a combined maximum capacity of 43 gallons per 12 months, moved to plant 1 in 2017 as follows:

   (1) having a vapor pressure equal to or less than 2 kPa; 15mm Hg; or 0.3 psi measured at 38°C (100°F) or;

   (2) having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20°C (68°F);

[Under 40 CFR 63, Subpart WWWW, these cleaners and solvent are considered an affected source.]
(b) One (1) resin mix tanks for mixing resin with inert ingredients, moved to Line 1 in 2017 identified as follows:

(1) Resin Sheer Mix Tank - Line 1 (SM1).

[Under 40 CFR 63, Subpart WWWW, this resin mix tank is considered an affected source.]

(c) Storage tanks as follows:

(1) One (1) horizontal polyester resin storage tank, identified as T3, approved in 2019 for construction, with a maximum capacity of 5,880 gallons, and exhausting to stack T3S.

[Under 40 CFR 63, Subpart WWWW, this storage tank is considered an affected source.]

(2) One (1) polyester resin storage tank, identified as T4, approved in 2018 for construction, with a maximum capacity of 5,880 gallons, and exhausting to stack T4S.

[Under 40 CFR 63, Subpart WWWW, this storage tank is considered an affected source.]

Line 2:

(d) Cleaners and solvents with a combined maximum capacity of 97 gallons per 12 months, as follows:

(1) having a vapor pressure equal to or less than 2 kPa; 15mm Hg; or 0.3 psi measured at 38°C (100°F) or;

(2) having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20°C (68°F);

[Under 40 CFR 63, Subpart WWWW, these cleaners and solvent are considered an affected source.]

(e) Mold Maintenance Area, including:

(1) One (1) Mold Repair area, constructed in 1998, using a brush and/or an aerosol sprayer dipped in Dixie Cup of resin or gel coat for minor gel coat mixing and touch-up of resin and gel coat.

(2) One (1) minor usage of sealers, buffing compounds, waxes, primers, and wood glues.

[Under 40 CFR 63, Subpart WWWW, this mold maintenance area is considered an affected source.]

(f) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals (kPa) measured at 38 degrees C).

A.4 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities:

Line 1:

(a) Natural gas-fired combustion sources, approved in 2017 for construction, consisting of comfort heaters and an air makeup unit, with a combined total rating of 9.1 million British
thermal units (MMBtu) per hour.

(b) Eight (8) gel coat touch up repair stations, identified as L1GT1 through L1GT8, with a maximum capacity of 15 fiberglass units per hour, and uncontrolled.

Line 2:
(c) Natural gas-fired combustion sources, consisting of the following:

(1) Two (2) air makeup units, identified as L2AM1 and L2AM2, rated at 2.75 MMBtu per hour, each;

(2) Two (2) Thermocycler units, identified as L2TC1 and L2TC2, rated at 0.75 MMBtu per hr, each;

(3) Four (4) space heating units, identified as L2SH1 through L2SH4, rated at 0.15 MMBtu per hr, each.

(d) Welding operations related to routine fabrication, maintenance and repair of buildings, structures, equipment or vehicles at the source where air emissions from those activities would not be associated with any commercial production process.

(e) Woodworking operations as follows:

(1) One trim booth, identified as T2, constructed in 1998, controlled by dust collector identified as DC1, exhausting outdoors through stack DC1S, consisting of:

   (A) Two (2) trimmer saws, each with a throughput capacity of 969 pounds per hour; and

   (B) Two (2) hand grinders, each with a throughput capacity of 969 pounds per hour.

(2) One (1) small table saw, identified as TS, constructed in 1998 and located in the Whirlpool area, with a throughput capacity of 300 pounds reinforced polyester plastic per hour, uncontrolled and not exhausting to a stack.

(3) One (1) small circular saw, identified as CS, constructed in 1998 and located in the final finish area, with a throughput capacity of 150 pounds reinforced polyester plastic per hour, uncontrolled and not exhausting to a stack.

(f) Eight (8) gel coat touch up repair stations, identified as L2GT1 through L2GT8, with a maximum capacity of 30 fiberglass units per hour, and uncontrolled.

A.5 Part 70 Permit Applicability [326 IAC 2-7-2]
This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).
SECTION B GENERAL CONDITIONS

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

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

B.2 Permit Term [326 IAC 2-7-5(2)][326 IAC 2-1.1-9.5][326 IAC 2-7-4(a)(1)(D)][IC 13-15-3-6(a)]

(a) This permit, T085-37492-00077, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

(b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

B.3 Term of Conditions [326 IAC 2-1.1-9.5]

Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

(a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or

(b) the emission unit to which the condition pertains permanently ceases operation.

B.4 Enforceability [326 IAC 2-7-7][IC 13-17-12]

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

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

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

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

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

B.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]

(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.

(b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U.S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.
B.8 Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]

(a) A certification required by this permit meets the requirements of 326 IAC 2-7-6(1) if:

(1) it contains a certification by a "responsible official" as defined by 326 IAC 2-7-1(35), and

(2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.

(c) A "responsible official" is defined at 326 IAC 2-7-1(35).

B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]

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

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

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

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and

(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.
B.10 Preventive Maintenance Plan [326 IAC 2-7-5(12)] [326 IAC 1-6-3]

(a) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

The Permittee shall implement the PMPs.

(b) If required by specific condition(s) in Section D of this permit where no PMP was previously required, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

The PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

The Permittee shall implement the PMPs.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. The
PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

(d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.11 Emergency Provisions [326 IAC 2-7-16]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, or Northern Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

   Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance and Enforcement Branch), or
   Telephone Number: 317-233-0178 (ask for Office of Air Quality, Compliance and Enforcement Branch)
   Facsimile Number: 317-233-6865
   Northern Regional Office phone: (574) 245-4870; fax: (574) 245-4877.

(5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
   Compliance and Enforcement Branch, Office of Air Quality
   100 North Senate Avenue
   MC 61-53 IGCN 1003
   Indianapolis, Indiana 46204-2251

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

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

(A) A description of the emergency;
Any steps taken to mitigate the emissions; and

Corrective actions taken.

The notification which shall be submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

The Permittee immediately took all reasonable steps to correct the emergency.

In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(8) be revised in response to an emergency.

Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable
requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

(c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

(d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:

1. The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

2. The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

3. The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and

4. The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

(e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

(f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]

(g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5][326 IAC 2-7-10.5]

(a) All terms and conditions of permits established prior to T085-37492-00077 and issued pursuant to permitting programs approved into the state implementation plan have been either:

1. incorporated as originally stated,

2. revised under 326 IAC 2-7-10.5, or

3. deleted under 326 IAC 2-7-10.5.

(b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

B.14 Termination of Right to Operate [326 IAC 2-7-10][326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).
B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination

**[326 IAC 2-7-5(6)(C)]**

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a “responsible official” as defined by 326 IAC 2-7-1(35).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

(c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.16 Permit Renewal

**[326 IAC 2-7-3]**

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(42). The renewal application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a “responsible official” as defined by 326 IAC 2-7-1(35).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

(b) A timely renewal application is one that is:

(1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(2) 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
If the Permittee submits a timely and complete application for renewal of this permit, the source’s failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-7-4(a)(2)(D), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.17 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12]
(a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).
(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.18 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)][326 IAC 2-7-12(b)(2)]
(a) No Part 70 permit revision or notice shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
(b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.19 Operational Flexibility [326 IAC 2-7-20][326 IAC 2-7-10.5]
(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b) or (c) without a prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;
(2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
(3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management  
Permit Administration and Support Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

and

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

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

(5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-7-20(b)(1) and (c)(1). The Permittee shall make such records available, upon reasonable request, for public review.

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

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(37)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

(c) Emission Trades [326 IAC 2-7-20(c)]

The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
(d) **Alternative Operating Scenarios [326 IAC 2-7-20(d)]**
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ or U.S. EPA is required.

(e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

**B.20 Source Modification Requirement [326 IAC 2-7-10.5]**
A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2.

**B.21 Inspection and Entry [326 IAC 2-7-6][IC 13-14-2-2][IC 13-30-3-1][IC 13-17-3-2]**
Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;

(c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

**B.22 Transfer of Ownership or Operational Control [326 IAC 2-7-11]**
(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

**B.23 Annual Fee Payment** [326 IAC 2-7-19][326 IAC 2-7-5(7)][326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.

(b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

**B.24 Credible Evidence** [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314][326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.
SECTION C  SOURCE OPERATION CONDITIONS

Entire Source

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

C.1  Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

C.2  Opacity [326 IAC 5-1]

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

(a)  Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

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

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

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

The Permittee shall not operate an incinerator except as provided in 326 IAC 4-2 or in this permit. The Permittee shall not operate a refuse incinerator or refuse burning equipment except as provided in 326 IAC 9-1-2 or in this permit.

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

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6  Fugitive Particulate Matter Emission Limitations [326 IAC 6-5]

Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate matter emissions shall be controlled according to the attached plan as in Attachment A. The provisions of 326 IAC 6-5 are not federally enforceable.

C.7  Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC 1-7-1(3), 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4, and 326 IAC 1-7-5(a), (b), and (d) are not federally enforceable.
C.8 Asbestos Abatement Projects [326 IAC 14-10][326 IAC 18][40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

1. When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

2. If there is a change in the following:
   - Asbestos removal or demolition start date;
   - Removal or demolition contractor; or
   - 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
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a “responsible official” as defined by 326 IAC 2-7-1(35).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable 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.
Demolition and Renovation

The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

Indiana Licensed 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 Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

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

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

(a) For performance testing required by this permit, a test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.10 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

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

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

(a) For new units:

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units shall be implemented on and after the date of initial start-up.

(b) For existing units:

Unless otherwise specified in this permit, for all monitoring requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance to begin such monitoring. If, due to circumstances beyond the
Permittee's control, any monitoring equipment required by this permit cannot be installed and operated no later than ninety (90) days after permit issuance, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

The notification which shall be submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

C.12 Instrument Specifications [326 IAC 2-1.1-11][326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]
(a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale. The analog instrument shall be capable of measuring values outside of the normal range.

(b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

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

C.13 Emergency Reduction Plans [326 IAC 1-5-2][326 IAC 1-5-3]
Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):
(a) The Permittee shall maintain the most recently submitted written emergency reduction plans (ERPs) consistent with safe operating procedures.
(b) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.14 Risk Management Plan [326 IAC 2-7-5(11)][40 CFR 68]
If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

C.15 Response to Excursions or Exceedances [326 IAC 2-7-5][326 IAC 2-7-6]
Upon detecting an excursion where a response step is required by the D Section or an exceedance of a limitation in this permit:
(a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.
(b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:

1. Initial inspection and evaluation;
2. Recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system); or
3. Any necessary follow-up actions to return operation to normal or usual manner of operation.

(c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:

1. Monitoring results;
2. Review of operation and maintenance procedures and records; and/or
3. Inspection of the control device, associated capture system, and the process.

(d) Failure to take reasonable response steps shall be considered a deviation from the permit.

(e) The Permittee shall record the reasonable response steps taken.

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

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall submit a description of its response actions to IDEM, OAQ no later than seventy-five (75) days after the date of the test.

(b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

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

In accordance with the compliance schedule specified in 326 IAC 2-6-3(b)(1), starting in 2004 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:
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(1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);

(2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(33) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue
MC 61-50 IG-CN 1003
Indianapolis, Indiana 46204-2251

The emission statement does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

(a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. Support information includes the following, where applicable:

(A) All calibration and maintenance records.
(B) All original strip chart recordings for continuous monitoring instrumentation.
(C) Copies of all reports required by the Part 70 permit.

Records of required monitoring information include the following, where applicable:

(A) The date, place, as defined in this permit, and time of sampling or measurements.
(B) The dates analyses were performed.
(C) The company or entity that performed the analyses.
(D) The analytical techniques or methods used.
(E) The results of such analyses.
(F) The operating conditions as existing at the time of sampling or measurement.

These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)][326 IAC 2-1.1-11]

(a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Proper notice submittal under Section B -Emergency Provisions satisfies the reporting requirements of this paragraph. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after
the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

(b) The address for report submittal is:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

(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, OAQ on or before the date it is due.

(d) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit “calendar year” means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

C.20 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 applicable standards for recycling and emissions reduction.
SECTION D.1  EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Line 1:
(a) One (1) fiberglass production line, identified as Line 1, installed in February 1998, approved for modification in 2014, moved to plant 1 in 2017 with a maximum production rate of 15 fiberglass units per hour, including:

(1) One (1) chop resin application booth, identified as SG1, consisting of:
   (A) one (1) non-atomized fluid impingement chop gun, identified as SG1A, installed in February 1998, and
   (B) one (1) non-atomized fluid impingement chop gun, identified as SG1B, approved for installation in 2014.
   (C) one (1) non-atomized fluid impingement chop gun, identified as SG1C, approved in 2018 for construction.

This chop resin application booth is equipped with dry filters for particulate control exhausting to one (1) stack identified as SG1X.

(2) One (1) gel coat application booth, identified as SG3, consisting three (3) stationary mechanical lesser atomized applicators, approved in 2019 for construction, exhausting to one (1) stack identified as SG3X. The booth is also equipped with dry filters for particulate control.

[Under 40 CFR 63, Subpart WWWW, this line 1 is considered an affected source.]

Line 2:
(c) One (1) fiberglass production line, identified as Line 2, installed in July 1999, with a maximum production rate of 30 fiberglass units per hour, including:

(1) One (1) chop resin application booth, consisting of three (3) non-atomized fluid impingement chop guns, identified as SG7, SG8, SG9, producing up to 30 fiberglass units per hour per gun, and exhausting to seven (7) stacks identified as SG7X, SG8X, SG9X, and SG2XA-SG2XD. The booth is also equipped with dry filters for particulate control.

(2) One (1) gel coat application booth, identified as SG5, consisting of three (3) stationary mechanical lesser atomized applicators, approved in 2019 for construction, exhausting to one (1) stack identified as SG5X. The booth is also equipped with dry filters for particulate control.

[Under 40 CFR 63, Subpart WWWW, this line 2 is considered an affected source.]

Insignificant Activities:

Line 1:
(a) Cleaners and solvents with a combined maximum capacity of 43 gallons per 12 months, moved to plant 1 in 2017 as follows:

(1) having a vapor pressure equal to or less than 2 kPa; 15mm Hg; or 0.3 psi
measured at 38°C (100°F) or;

(2) having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20°C (68°F);

[Under 40 CFR 63, Subpart WWWW, these cleaners and solvent are considered an affected source.]

(b) One (1) resin mix tank for mixing resin with inert ingredients, moved to Line 1 in 2017 identified as follows:

(1) Resin Sheer Mix Tank - Line 1 (SM1).

[Under 40 CFR 63, Subpart WWWW, this resin mix tank is considered an affected source.]

(c) One (1) storage tank as follows:

(1) One (1) horizontal polyester resin storage tank, identified as T3, approved in 2019 for construction, with a maximum capacity of 5,880 gallons, and exhausting to stack T3S.

[Under 40 CFR 63, Subpart WWWW, this storage tank is considered an affected source.]

Line 2:
(d) Cleaners and solvents with a combined maximum capacity of 97 gallons per 12 months, as follows:

(1) having a vapor pressure equal to or less than 2 kPa; 15mm Hg; or 0.3 psi measured at 38°C (100°F) or;

(2) having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20°C (68°F);

[Under 40 CFR 63, Subpart WWWW, these cleaners and solvent are considered an affected source.]

(e) Mold Maintenance Area, including:

(1) One (1) Mold Repair area, constructed in 1998, using a brush and/or an aerosol sprayer dipped in Dixie Cup of resin or gel coat for minor gel coat mixing and touch-up of resin and gel coat.

(2) One (1) minor usage of sealers, buffing compounds, waxes, primers, and wood glues.

[Under 40 CFR 63, Subpart WWWW, this mold maintenance area is considered an affected source.]

(f) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals (kPa) measured at 38 degrees C).

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)
Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6][326 IAC 20-56]

Pursuant to SSM No. 085-28953-00077, issued on August 19, 2010, SSM 085-34118-00077, and 326 IAC 8-1-6 (New Facilities; General Reduction Requirements), the best available control technology (BACT) for VOC emissions from the Line 1 fiberglass production line (SG1) and the Line 2 fiberglass production line (SG7, and SG8) shall be as follows:

(a) Compliance with all applicable requirements of 40 CFR 63, Subpart WWWW, as specified in Section E.1 of this permit.

(b) Compliance with the following requirements of 326 IAC 20-56-2, Operator Training:

(1) Each owner or operator shall train all new and existing personnel, including contract personnel, who are involved in resin and gel coat spraying and applications that could result in excess emissions if performed improperly according to the following schedule:

(A) All personnel hired shall be trained within thirty (30) days of hiring.

(B) To ensure training goals listed in subparagraph (b)(2) are maintained, all personnel shall be given refresher training annually.

(C) Personnel who have been trained by another owner or operator subject to this rule are exempt from subparagraph (b)(1)(A) if written documentation that the employee's training is current is provided to the new employer.

(2) The lesson plans shall cover, for the initial and refresher training, at a minimum, all of the following topics:

(A) Appropriate application techniques.

(B) Appropriate equipment cleaning procedures.

(C) Appropriate equipment setup and adjustment to minimize material usage and overspray.

(3) The owner or operator shall maintain the following training records on site and make them available for inspection and review:

(A) A copy of the current training program.

(B) A list of the following:

(i) All current personnel, by name, that are required to be trained.

(ii) The date the person was trained or the date of the most recent refresher training, whichever is later.

(4) Records of prior training programs and former personnel are not required to be maintained.

D.1.2 Prevention of Significant Deterioration (PSD) Minor Limits [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD) not applicable, the nonfugitive volatile organic compound emissions from fiberglass production lines, identified as Line 1 and Line 2 shall comply with the following:
The usage of resins, gel coats, catalysts, mold release agents, mold maintenance touch-up, and solvents at the Line 1 reinforced plastic composites manufacturing operations, including the resin application guns (SG1A, SG1B, and SGC) of chop resin application booth, (SG1) the gel coat application booth (SG3), and gel coat touchup rooms, identified as P1GT1 - P1GT8, shall be limited such that the total VOC emissions from these units shall not exceed 90 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

The usage of resins, gel coats, catalysts, mold release agents, mold maintenance touch-up, and solvents at the Line 2 reinforced plastic composites manufacturing operations, including the resin application guns (SG7, SG8, and SG9), the gel coat application booth (SG5), and the gel coat touchup rooms, identified as P2GT1 - P2GT8, shall be limited such that the total VOC emissions from these units shall not exceed 139 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with these limits, combined with the potential to emit VOC from all other emission units at this source, shall limit the total source wide total potential to emit nonfugitive VOC emissions to less than two hundred fifty (250) tons per year and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable to the source.

### D.1.3 Particulate Matter (PM) [326 IAC 6-3][326 IAC 2-2]

Pursuant to 326 IAC 6-3-2(d), particulate emissions from the gel coat applicators in SG3 and SG5 shall be controlled by a particulate filter, waterwash, or an equivalent control device, and the source shall operate it in accordance with the manufacturer’s specifications.

### D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

A Preventive Maintenance Plan is required for each of these facilities and their control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

### Compliance Determination Requirements [326 IAC 2-7-5(1)]

#### D.1.5 Volatile Organic Compounds (VOC) Calculations

In order to ensure compliance with Conditions D.1.2(a) and D.1.2(b) - Volatile Organic Compounds (VOC), the VOC emission shall be calculated as follows:

(a) For the catalysts, mold release agents, and solvents, the VOC emissions shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

(b) For the resins and gel coats, the VOC emissions shall be calculated by multiplying the usage of each gel coat and resin by the emission factor provided by the "Unified Emission Factors for Open Molding of Composites", Composites Fabricators Association, July 23, 2001, or its updates in conjunction with the following equation:

\[
E_x = \sum_{i=1}^{n_i} A_i B_i \cdot \frac{UEF_i}{2000}
\]

Where:

\[
E = \text{VOC emissions (ton/month)}
\]
x = Production line number
n = Number of resin or gel coat materials used during the month
i = Each type of resin or gel coat
\( A_i = \) Density of resin or gel coat material (lb/gal resin or gel coat)
\( B_i = \) Gallons of resin or gel coat used per month (gal/month)
\( UEF_i = \) Unified Emission Factor for Open Molding of Composites (lb monomer/ton resin or gel coat) based on monomer content (as determined from the manufacturer's material safety data sheet), application technique, and other emission reduction techniques for each resin and gel coat
2,000 = Conversion factor (2,000 lb/ton)

Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA approved form, emission factors shall be taken from the following reference approved by IDEM, OAQ: "Unified Emission Factors for Open Molding of Composites", July 23, 2001, or its updates, except use of controlled spray emission factors must be approved by the commissioner. For the purposes of these emission calculations, monomer in resins and gel coats that is not styrene shall be considered as styrene on an equivalent weight basis.

D.1.6 Particulate Control

In order to ensure compliance with Condition D.1.3, the dry filters for the gel coat applicators in SG3 and SG5 shall be in operation and control emissions from the gel coat applicators in SG3 and SG5 at all times the gel coat applicators are in operation.

Compliance Monitoring Requirements [326 IAC 2-7-5(3)]

D.1.7 Dry Filter Inspection

The Permittee shall perform daily inspection of the dry filters controlling particulate from the gel coat applicators in SG3 and SG5 to verify that they are being operated and maintained in accordance with the manufacturer's specifications. All defective filters shall be replaced.

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

D.1.8 Record Keeping Requirements

(a) To document the compliance status with Condition D.1.1(b), the Permittee shall maintain the following training records:

(1) A copy of the current training program.

(2) A list of all current personnel, by name, that are required to be trained and the dates they were trained and the date of the most recent refresher training. Records of prior training programs and former personnel are not required to be maintained.

(b) To document the compliance status with Conditions D.1.2(a) and D.1.2(b), the Permittee shall maintain records in accordance with (1) and (2) below. Records maintained for (1) and (2) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC emission limits established in Conditions D.1.2(a) and D.1.2(b). Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

(1) For coating material and solvent use other than monomer-based gel coats and resins:

(A) The VOC content of each coating material and solvent used.
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(B) The amount of coating and solvent used on a monthly basis.

   (i) Records shall include purchase orders, invoices, and material safety data sheets as necessary to verify the type and amount used.

   (ii) Solvent usage records shall differentiate between those added to coatings and those added as cleanup solvents.

(C) The total VOC usage for each month.

(2) For monomer-based gel coats and resins:

   (A) The monomer content of each resin and gel coat used.

   (B) The amount of gel coat and resin used on a monthly basis. Records shall include purchase orders, invoices, and material safety data sheets as necessary to verify the type and amount used.

   (C) The method of application and other emission reduction techniques for each resin and gel coat used.

   (D) Monthly calculations, as described in Condition D.1.5(b), demonstrating the weight of VOC emitted from resin and gel coat use each month.

(c) To document the compliance status with Condition D.1.7, the Permittee shall maintain daily records of the inspection of the gel coat applicators dry filters. The Permittee shall include in its daily record when an inspection is not taken and the reason for the lack thereof.

(d) Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to the records required by this condition.

D.1.9 Reporting Requirements

A quarterly report of the information to document the compliance status with Conditions D.1.2(a) and D.1.2(b) shall be submitted using the reporting forms located at the end of this permit, or their equivalent, not later than thirty (30) days following the end of each calendar quarter. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a “responsible official” as defined by 326 IAC 2-7-1(35). Section C - General Reporting Requirements contains the Permittee's obligations with regard to the reporting required by this condition.
Emissions Unit Description:

**Line 1:**

(b) Fiberglass Cutting Operations, controlled by dust collector identified as **DC1**, exhausting outdoors through stack DC1S, consisting of the following:

1. One (1) trim booth, identified as T1, constructed in 1998, and moved to Plant 1 in 2017, utilizing:
   
   (A) Two (2) trimmer saws, each with a throughput capacity of 969 pounds per hour; and
   
   (B) Two (2) hand grinders, each with a throughput capacity of 969 pounds per hour.

2. One (1) saw room, identified as SR1, approved in 2017 for construction.

   This saw room consists of:

   (A) One (1) table saw, with a maximum capacity of 200 pounds of wood per hour, controlled by dust collector, identified as DC2, venting indoors; and

   (B) One (1) radial saw, with a maximum capacity of 200 pounds of wood per hour, controlled by dust collector, identified as DC3, venting indoors.

Insignificant Activity:

**Line 2:**

(e) Woodworking operations as follows:

1. One trim booth, identified as T2, constructed in 1998 controlled by dust collector identified as DC1, exhausting outdoors through stack DC1S, consisting of:

   (A) Two (2) trimmer saws, each with a throughput capacity of 969 pounds per hour; and

   (B) Two (2) hand grinders, each with a throughput capacity of 969 pounds per hour.

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

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

**D.2.1 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]**

Pursuant to 326 IAC 6-3-2(e), the manufacturing processes listed in the table below shall be limited by the following:

<table>
<thead>
<tr>
<th>Process Description</th>
<th>Process Weight Rate (ton/hr)</th>
<th>326 IAC 6-3-2 Allowable (lb/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>T1</td>
<td>0.48</td>
<td>2.52</td>
</tr>
</tbody>
</table>
Process Description | Process Weight Rate (ton/hr) | 326 IAC 6-3-2 Allowable (lb/hr)
--- | --- | ---
SR1 | 0.10 | 0.88
T2 | 0.48 | 2.52

The pound per hour allowable was calculated with the following equation:

\[ E = 4.10 P^{0.67} \]

where:

- \( E \) = rate of emission in pounds per hour
- \( P \) = process weight rate in tons per hour

D.2.2 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

A Preventive Maintenance Plan is required for each of these facilities and their control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

D.2.3 Particulate Control

In order to ensure that the trim booths, identified as T1 and T2 and the saw room identified as SR1 shall comply with the requirements of 326 IAC 6-3-2, internal dust collection system for particulate control, identified as DC1, DC2 and DC3 shall be in operation and control emissions from the trim booths and the saw room at all times the trim booths and the saw room are in operation.

D.2.4 Broken or Failed Bag Detection

(a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

(b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Bag failure can be indicated by a significant drop in the baghouse's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

D.2.5 Visible Emissions Notations

(a) Visible emission notations of baghouse DC1, DC2 and DC3 stack exhausts shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) If abnormal emissions are observed, the Permittee shall take a reasonable response. Section C – Response to Excursions and Exceedances contains the Permittee’s obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

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

D.2.6 Record Keeping Requirements

(a) To document the compliance status with Condition D.2.5 (Visible Emissions Notations), the Permittee shall maintain records of daily visible emission notations of the baghouse(s) stack exhausts. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).

(b) Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to the records required by this condition.
## Emissions Unit Description:

**Line 1:**

(a) One (1) fiberglass production line, identified as Line 1, installed in February 1998, approved for modification in 2014, moved in 2017 with a maximum production rate of 15 fiberglass units per hour, including:

1. One (1) chop resin application booth, identified as SG1, consisting of:
   - (A) one (1) non-atomized fluid impingement chop gun, identified as SG1A, installed in February 1998, and
   - (B) one (1) non-atomized fluid impingement chop gun, identified as SG1B, approved for installation in 2014.
   - (C) one (1) non-atomized fluid impingement chop gun, identified as SG1C, approved in 2018 for construction.

   This chop resin application booth is equipped with dry filters for particulate control exhausting to one (1) stack identified as SG1X.

2. One (1) gel coat application booth, identified as SG3, consisting of three (3) stationary mechanical lesser atomized applicators, approved in 2019 for construction, exhausting to one (1) stack identified as SG3X. The booth is also equipped with dry filters for particulate control.

   [Under 40 CFR 63, Subpart WWWW, this line 1 is considered an affected source.]

**Line 2:**

(b) One (1) fiberglass production line, identified as Line 2, installed in July 1999, with a maximum production rate of 30 fiberglass units per hour, including:

1. One (1) chop resin application booth, consisting of three (3) non-atomized fluid impingement chop guns, identified as SG7, SG8, and SG9, producing up to 30 fiberglass units per hour per gun, and exhausting to seven (7) stacks identified as SG7X, SG8X, SG9X, and SG2XA-SG2XD. The booth is also equipped with dry filters for particulate control.

2. One (1) gel coat application booth, identified as SG5, consisting of three (3) stationary mechanical lesser atomized applicators, approved in 2019 for construction, exhausting to one (1) stack identified as SG5X. The booth is also equipped with dry filters for particulate control.

   [Under 40 CFR 63, Subpart WWWW, this line 2 is considered an affected source.]

**Insignificant Activities:**

**Line 1:**

(a) Cleaners and solvents with a combined maximum capacity of 43 gallons per 12 months, as follows:

1. having a vapor pressure equal to or less than 2 kPa; 15mm Hg; or 0.3 psi
measured at 38°C (100°F) or;

(2) having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20°C (68°F);

[Under 40 CFR 63, Subpart WWWW, these cleaners and solvent are considered an affected source.]

(b) One (1) resin mix tanks for mixing resin with inert ingredients, moved to Line 1 in 2017 identified as follows:

(1) Resin Sheer Mix Tank - Line 1 (SM1).

[Under 40 CFR 63, Subpart WWWW, this resin mix tank is considered an affected source.]

(c) Storage tanks as follows:

(1) One (1) horizontal polyester resin storage tank, identified as T3, approved in 2019 for construction, with a maximum capacity of 5,880 gallons, and exhausting to stack T3S.

[Under 40 CFR 63, Subpart WWWW, this storage tank is considered an affected source.]

(2) One (1) polyester resin storage tank, identified as T4, approved in 2018 for construction, with a maximum capacity of 5,880 gallons, and exhausting to stack T4S.

[Under 40 CFR 63, Subpart WWWW, this storage tank is considered an affected source.]

(b) Eight (8) gel coat touch up repair stations, identified as L1GT1 through L1GT8, with a maximum capacity of 15 fiberglass units per hour, and uncontrolled

[Under 40 CFR 63, Subpart WWWW, these gel coat touch up repair stations are considered an affected source.]

Line 2:

(e) Cleaners and solvents with a combined maximum capacity of 97 gallons per 12 months, as follows:

(1) having a vapor pressure equal to or less than 2 kPa; 15mm Hg; or 0.3 psi measured at 38°C (100°F) or;

(2) having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20°C (68°F);

[Under 40 CFR 63, Subpart WWWW, these cleaners and solvent are considered an affected source.]

(e) Mold Maintenance Area, including:

(1) One (1) Mold Repair area, constructed in 1998, using a brush and/or an aerosol sprayer dipped in Dixie Cup of resin or gel coat for minor gel coat mixing and touch-up of resin and gel coat.

(2) One (1) minor usage of sealers, buffing compounds, waxes, primers, and
[Under 40 CFR 63, Subpart WWWW, this mold maintenance area is considered an affected source.]

(f) Eight (8) gel coat touch up repair stations, identified as L2GT1 through L2GT8, with a maximum capacity of 30 fiberglass units per hour, and uncontrolled

[Under 40 CFR 63, Subpart WWWW, these gel coat touch up repair stations are considered an affected source.]

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements [326 IAC 2-7-5(1)]


(a) Pursuant to 40 CFR 63.1 the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 20-1, for the emission unit(s) listed above, except as otherwise specified in 40 CFR Part 63, Subpart WWWW (4W).

(b) Pursuant to 40 CFR 63.10, the Permittee shall submit all required notifications and reports to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251


The Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart WWWW (4W) included as Attachment A to the operating permit), which are incorporated by reference as 326 IAC 20-56, for the emission unit(s) listed above:

(1) 40 CFR 63.5780
(2) 40 CFR 63.5785(a)
(3) 40 CFR 63.5790
(4) 40 CFR 63.5795(b)
(5) 40 CFR 63.5796
(6) 40 CFR 63.5797
(7) 40 CFR 63.5798
(8) 40 CFR 63.5799(b) and (c)
(9) 40 CFR 63.5800
(10) 40 CFR 63.5805(b) and (g)
(11) 40 CFR 63.5810
(12) 40 CFR 63.5835(a) and (c)
(13) 40 CFR 63.5840
(14) 40 CFR 63.5860(a)
(15) 40 CFR 63.5895(b), (c) and (d)
(16) 40 CFR 63.5900(a)(2)-(4), (b) and (c)
(17) 40 CFR 63.5905
(18) 40 CFR 63.5910(a), (b), (c), (d), (g), (h) and (i)
(19) 40 CFR 63.5915(a), (c) and (d)
(20) 40 CFR 63.5920
(21) 40 CFR 63.5925
(22) 40 CFR 63.5930
(23) 40 CFR 63.5935
(24) Table 1 to Subpart WWWW of Part 63
(25) Table 2 to Subpart WWWW of Part 63
(26) Table 3 to Subpart WWWW of Part 63
(27) Table 4 to Subpart WWWW of Part 63
(28) Table 7 to Subpart WWWW of Part 63
(29) Table 8 to Subpart WWWW of Part 63
(30) Table 9 to Subpart WWWW of Part 63
(31) Table 13 to Subpart WWWW of Part 63
(32) Table 14 to Subpart WWWW of Part 63
(33) Table 15 to Subpart WWWW of Part 63
Source Name: Patrick Industries, Inc d/b/a Frontline Manufacturing
Source Address: 1445 Polk Drive, Warsaw, Indiana 46580
Part 70 Permit No.: T085-37492-00077

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

Please check what document is being certified:

☐ Annual Compliance Certification Letter
☐ Test Result (specify)
☐ Report (specify)
☐ Notification (specify)
☐ Affidavit (specify)
☐ Other (specify)

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

Signature:

Printed Name:

Title/Position:

Phone:

Date:
PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT

This form consists of 2 pages

☐ This is an emergency as defined in 326 IAC 2-7-1(12)

- The Permittee must notify the Office of Air Quality (OAQ), within four (4) daytime business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
- The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16.

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

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency:

Describe the cause of the Emergency:
If any of the following are not applicable, mark N/A

<table>
<thead>
<tr>
<th>Date/Time Emergency started:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Date/Time Emergency was corrected:</td>
</tr>
<tr>
<td>Was the facility being properly operated at the time of the emergency? Y N</td>
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<tr>
<td>Type of Pollutants Emitted: TSP, PM-10, SO₂, VOC, NOₓ, CO, Pb, other:</td>
</tr>
<tr>
<td>Estimated amount of pollutant(s) emitted during emergency:</td>
</tr>
<tr>
<td>Describe the steps taken to mitigate the problem:</td>
</tr>
<tr>
<td>Describe the corrective actions/response steps taken:</td>
</tr>
<tr>
<td>Describe the measures taken to minimize emissions:</td>
</tr>
<tr>
<td>If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:</td>
</tr>
</tbody>
</table>

Form Completed by: ____________________________
Title / Position: ____________________________
Date: ____________________________
Phone: ____________________________
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH

Part 70 Quarterly Report

Source Name: Patrick Industries, Inc. d/b/a Frontline Manufacturing
Source Address: 1445 Polk Drive, Warsaw, Indiana 46580
Part 70 Permit No.: T085-31394-00077
Facility: Line 1 Fiberglass Production Operations consisting of: Chop Resin Application Booth (SG1) with Chop Spray Guns (SG1A, SG1B, and SG1C), Gel Coat Application Booth (SG3), and gel coat touchup rooms, identified as L1GT1 - L1GT8
Parameter: VOC Emissions
Limit: The usage of resins, gel coats, catalysts, mold release agents, mold maintenance touch-up, and solvents at the Line 1 reinforced plastic composites manufacturing operations, shall be limited such that the total VOC emissions from these units shall not exceed 90 tons per twelve (12) consecutive month period, with compliance determined at the end of each month

<table>
<thead>
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<th>QUARTER:</th>
<th>YEAR:</th>
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<tbody>
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<td>2023</td>
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<th>Column 2</th>
<th>Column 1 + Column 2</th>
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<tr>
<td>This Month</td>
<td>Previous 11 Months</td>
<td>12 Month Total</td>
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</table>

☐ No deviation occurred in this quarter.
☐ Deviation/s occurred in this quarter.
Deviation has been reported on: 

Submitted by: 
Title / Position: 
Signature: 
Date: 
Phone:
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE AND ENFORCEMENT BRANCH  

Part 70 Quarterly Report

Source Name: Patrick Industries, Inc. d/b/a Frontline Manufacturing  
Source Address: 1445 Polk Drive, Warsaw, Indiana 46580  
Part 70 Permit No.: T085-31394-00077  
Facility: Line 2 Fiberglass Production, including Chop Spray Guns (SG7, SG8, and SG9)  
Gel Coat Application Booth (SG5), and the gel coat touchup rooms, identified as L2GT1 - L2GT8  
Parameter: VOC Emissions  
Limit: The usage of resins, gel coats, catalysts, mold release agents, mold maintenance touch-up, and solvents at the Line 2 reinforced plastic composites manufacturing operations, shall be limited such that the total VOC emissions from these units shall not exceed 139 tons per twelve (12) consecutive month period, with compliance determined at the end of each month

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<thead>
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<th>YEAR:</th>
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<table>
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<th>Column 1 + Column 2</th>
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<tbody>
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☐ No deviation occurred in this quarter.  
☐ Deviation/s occurred in this quarter.  
Deviation has been reported on: ___________________

Submitted by: _____________________________________________________  
Title / Position: ___________________________________________________  
Signature: ________________________________________________________  
Date: ____________________________________________________________  
Phone: __________________________________________________________
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE AND ENFORCEMENT BRANCH  
PART 70 OPERATING PERMIT  

QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT  

Source Name: Patrick Industries, Inc d/b/a Frontline Manufacturing  
Source Address: 1445 Polk Drive, Warsaw, Indiana 46580  
Part 70 Permit No.: T085-37492-00077  

Months: __________ to __________ Year: __________

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<tr>
<th>Permit Requirement (specify permit condition #)</th>
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<th>Duration of Deviation:</th>
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<tr>
<td>Probable Cause of Deviation:</td>
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<td></td>
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<tr>
<td>Response Steps Taken:</td>
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<tr>
<td>Response Steps Taken:</td>
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</tbody>
</table>

☐ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.  
☐ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD
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<th>Permit Requirement (specify permit condition #)</th>
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<td>Response Steps Taken:</td>
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<tr>
<td>Probable Cause of Deviation:</td>
<td></td>
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<tr>
<td>Response Steps Taken:</td>
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<tr>
<td>Probable Cause of Deviation:</td>
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<tr>
<td>Response Steps Taken:</td>
<td></td>
</tr>
</tbody>
</table>

Form Completed by: ____________________________

Title / Position: ____________________________

Date: ____________________________

Phone: ____________________________
Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Part 70 Significant Source Modification and Significant Permit Modification

Source Description and Location

Source Name: Patrick Industries Inc. dba Frontline Manufacturing  
Source Location: 1445 Polk Dr., Warsaw, Indiana 46580  
County: Kosciusko  
SIC Code: 3088 (Plastics Plumbing Fixtures)  
Operation Permit No.: T 085-37492-00077  
Operation Permit Issuance Date: November 23, 2016  
Significant Source Modification No.: 085-41958-00077  
Significant Permit Modification No.: 085-41960-00077  
Permit Reviewer: Wilfredo de la Rosa

Existing Approvals

The source was issued Part 70 Operating Permit Renewal No. 085-37492-00077 on November 23, 2016. The source has since received the following approvals:

<table>
<thead>
<tr>
<th>Permit Type</th>
<th>Permit Number</th>
<th>Issuance Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Minor Source Modification</td>
<td>085-38855-00077</td>
<td>September 13, 2017</td>
</tr>
<tr>
<td>Significant Permit Modification</td>
<td>085-38858-00077</td>
<td>November 16, 2017</td>
</tr>
<tr>
<td>Administrative Amendment</td>
<td>085-39360-00077</td>
<td>February 2, 2018</td>
</tr>
<tr>
<td>Significant Source Modification</td>
<td>085-40202-00077</td>
<td>November 20, 2018</td>
</tr>
<tr>
<td>Significant Permit Modification</td>
<td>085-40218-00077</td>
<td>December 14, 2018</td>
</tr>
</tbody>
</table>

County Attainment Status

The source is located in Kosciusko County.

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Designation</th>
</tr>
</thead>
<tbody>
<tr>
<td>SO₂</td>
<td>Better than national standards.</td>
</tr>
<tr>
<td>CO</td>
<td>Unclassifiable or attainment effective November 15, 1990.</td>
</tr>
<tr>
<td>O₃</td>
<td>Unclassifiable or attainment effective July 20, 2012, for the 2008 8-hour ozone standard.¹</td>
</tr>
<tr>
<td>PM₂.₅</td>
<td>Unclassifiable or attainment effective April 5, 2005, for the annual PM₂.₅ standard.</td>
</tr>
<tr>
<td>PM₁₀</td>
<td>Unclassifiable or attainment effective December 13, 2009, for the 24-hour PM₂.₅ standard.</td>
</tr>
<tr>
<td>NO₂</td>
<td>Cannot be classified or better than national standards.</td>
</tr>
<tr>
<td>Pb</td>
<td>Unclassifiable or attainment effective December 31, 2011.</td>
</tr>
</tbody>
</table>

¹Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005.

(a) Ozone Standards
Volatile organic compounds (VOC) and Nitrogen Oxides (NOₓ) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOₓ emissions are considered when
evaluating the rule applicability relating to ozone. Kosciusko 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.

(b) PM2.5

Kosciusko County has been classified as attainment for PM2.5. Therefore, direct PM2.5, SO2, and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(c) Other Criteria Pollutants

Kosciusko County has been classified as attainment or unclassifiable in Indiana for all the other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

Since this type of operation is not one (1) of the twenty-eight (28) listed source categories under 326 IAC 2-2-1(ff)(1), 326 IAC 2-3-2(g), or 326 IAC 2-7-1(22)(B), and there is no applicable New Source Performance Standard or National Emission Standard for Hazardous Air Pollutants that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

The fugitive emissions of hazardous air pollutants (HAP) are counted toward the determination of Part 70 Permit applicability and source status under Section 112 of the Clean Air Act (CAA).

Greenhouse Gas (GHG) Emissions

On June 23, 2014, in the case of Utility Air Regulatory Group v. EPA, cause no. 12-1146, (available at http://www.supremecourt.gov/opinions/13pdf/12-1146_4g18.pdf) the United States Supreme Court ruled that the U.S. EPA does not have the authority to treat greenhouse gases (GHGs) as an air pollutant for the purpose of determining operating permit applicability or PSD Major source status. On July 24, 2014, the U.S. EPA issued a memorandum to the Regional Administrators outlining next steps in permitting decisions in light of the Supreme Court’s decision. U.S. EPA’s guidance states that U.S. EPA will no longer require PSD or Title V permits for sources “previously classified as ‘Major’ based solely on greenhouse gas emissions.”

The Indiana Environmental Rules Board adopted the GHG regulations required by U.S. EPA at 326 IAC 2-2-1(zz), pursuant to Ind. Code § 13-14-9-8(h) (Section 8 rulemaking). A rule, or part of a rule, adopted under Section 8 is automatically invalidated when the corresponding federal rule, or part of the rule, is invalidated. Due to the United States Supreme Court Ruling, IDEM, OAQ cannot consider GHG emissions to determine operating permit applicability or PSD applicability to a source or modification.
## Source Status - Existing Source

The table below summarizes the potential to emit of the entire source, prior to the proposed modification, after consideration of all enforceable limits established in the effective permits. If the control equipment has been determined to be integral, the table reflects the potential to emit (PTE) after consideration of the integral control device.

<table>
<thead>
<tr>
<th>Source-Wide Emissions Prior to Modification (ton/year)</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM¹</td>
</tr>
<tr>
<td>Total PTE of Entire Source Excluding Fugitive Emissions*</td>
</tr>
<tr>
<td>Title V Major Source Thresholds</td>
</tr>
<tr>
<td>PSD Major Source Thresholds</td>
</tr>
</tbody>
</table>

¹Under the Part 70 Permit program (40 CFR 70), PM₁₀ and PM₂.₅, not particulate matter (PM), are each considered as a "regulated air pollutant."
²PM₂.₅ listed is direct PM₂.₅.
³Single highest source-wide HAP
*Fugitive HAP emissions are always included in the source-wide emissions.

(a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no PSD regulated pollutant is emitted at a rate of two hundred fifty (250) tons per year or more and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1).

(b) This existing source is a major source of HAP, as defined in 40 CFR 63.2, because HAP emissions are equal to or greater than ten (10) tons per year for a single HAP and equal to or greater than twenty-five (25) tons per year for a combination of HAPs.

(c) These emissions are based on the TSD of FESOP Significant Permit Modification No. 085-40218-00077, issued on December 14, 2018.

## Description of Proposed Modification

The Office of Air Quality (OAQ) has reviewed an application, submitted by Patrick Industries Inc. dba Frontline Manufacturing on September 23, 2019, relating to the replacement of the four (4) non-atomized gel coat guns with four (4) new mechanical lesser atomized (low volume, low pressure (LVLP)) gel coat guns, the addition of two (2) new mechanical lesser atomized gel coat guns, replacement of the resin tank, T3 and the removal of the four (4) portable gel coat application guns from booths SG3 and SG5. The source also requested for administrative changes in the descriptive information (replace Plant with Line) and removal of some insignificant activities.

The following is a list of the new and modified emission units:

(a) Three (3) stationary mechanical lesser atomized applicators, approved in 2019 for construction, located in gel coat application booth identified as SG3, exhausting to one (1) stack identified as SG3X. The booth is also equipped with dry filters for particulate control.

(b) Three (3) stationary mechanical lesser atomized applicators, approved in 2019 for construction, located in gel coat application booth identified as SG5, exhausting to one (1) stack identified as SG5X. The booth is also equipped with dry filters for particulate control.
(c) One (1) horizontal polyester resin storage tank, identified as T3, approved in 2019 for construction, with a maximum capacity of 5,880 gallons, and exhausting to stack T3S.

As part of this permitting action, the following emission units are being removed from the permit:

(a) Two (2) stationary non-atomized fluid impingement applicators, installed in February 1998, and two (2) portable non-atomized fluid impingement applicators, installed in 2003, located in gel coat application booth identified as SG3, exhausting to stack identified as SG3X.

(b) Two (2) stationary non-atomized fluid impingement applicators and two (2) portable non-atomized fluid impingement applicators, located in gel coat application booth identified as SG5, exhausting to stack identified as SG5X.

(c) One (1) polyester resin storage tank, identified as T3, approved in 2017 for construction, with a maximum capacity of 4,100 gallons, and exhausting to stack T3S.

(d) One (1) resin mix tanks for mixing resin with inert ingredients, identified as follows:
   (1) Resin Sheer Mix Tank - Line 2 (SM2). [326 IAC 6-3-2].

(e) Two (2) Thermocycler units, identified as P2TC3-P2TC4, rated at 0.75 MMBtu per hr, each.

(f) One (1) saw room, identified as SR, constructed in 1998, with an integral control consisting of one internal dust collection system for particulate control, exhausting indoors. This saw room consists of:
   (1) One (1) table saw, with a maximum capacity of 200 pounds of wood per hour; and
   (2) One (1) radial saw, with a maximum capacity of 200 pounds of wood per hour.

“Integral Part of the Process” Determination

In October 1993 a Final Order Granting Summary Judgment was signed by Administrative Law Judge (“ALJ”) Garretson resolving an appeal filed by Kimball Hospitality Furniture Inc. (Cause Nos. 92-A-J-730 and 92-A-J-833) related to the method by which IDEM calculated potential emissions from woodworking operations. In his findings, the ALJ determined that particulate controls are necessary for the facility to produce its normal product and are integral to the normal operation of the facility, and therefore, potential emissions should be calculated after controls. Based on this ruling, the potential to emit particulate matter from the woodworking operations was calculated after control for purposes of determining permitting level and applicability of 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), 326 IAC 6.5 (Particulate Matter Limitations Except Lake County), and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)).

Enforcement Issues

There are no pending enforcement actions related to this modification.

Emission Calculations

See Appendix A of this Technical Support Document for detailed emission calculations.

Pursuant to 326 IAC 2-1.1-1(12), Potential to Emit is defined as “the maximum capacity of a stationary source or emission unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, IDEM, or the appropriate local air pollution control agency.”
The following table is used to determine the appropriate permit level under 326 IAC 2-7-10.5. This table reflects the PTE before controls. If the control equipment has been determined to be integral, the table reflects the potential to emit (PTE) after consideration of the integral control device.

<table>
<thead>
<tr>
<th>Process / Emission Unit</th>
<th>PM</th>
<th>PM$_{10}$</th>
<th>PM$_{2.5}^1$</th>
<th>SO$_2$</th>
<th>NO$_X$</th>
<th>VOC</th>
<th>CO</th>
<th>Single HAP$^2$</th>
<th>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>3 Gel Coat (LVLP) guns in SG3</td>
<td>109.25</td>
<td>109.25</td>
<td>109.25</td>
<td>-</td>
<td>-</td>
<td>132.55</td>
<td>-</td>
<td>125.51 Styrene</td>
<td>126.40</td>
</tr>
<tr>
<td>3 Gel Coat (LVLP) guns in SG5</td>
<td>218.50</td>
<td>218.50</td>
<td>218.50</td>
<td>-</td>
<td>-</td>
<td>265.11</td>
<td>-</td>
<td>251.02 Styrene</td>
<td>252.80</td>
</tr>
<tr>
<td>Horizontal Tank T3</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>0.04</td>
<td>-</td>
<td>0.04</td>
<td>0.04</td>
</tr>
<tr>
<td><strong>Total PTE Before Controls of the New Emission Units:</strong></td>
<td><strong>327.75</strong></td>
<td><strong>327.75</strong></td>
<td><strong>327.75</strong></td>
<td>-</td>
<td>-</td>
<td><strong>397.70</strong></td>
<td>-</td>
<td><strong>376.57</strong></td>
<td><strong>379.24</strong></td>
</tr>
</tbody>
</table>

$^1$PM$_{2.5}$ listed is direct PM$_{2.5}$.

Appendix A of this TSD reflects the detailed potential emissions of the modification.

(a) Approval to Construct

Pursuant to 326 IAC 2-7-10.5(g)(4), a Significant Source Modification is required because this modification has the potential to emit PM/PM10/direct PM2.5, and VOC at equal to or greater than twenty-five (25) tons per year.

Pursuant to 326 IAC 2-7-10.5(g)(6), a Significant Source Modification is required because this modification has a potential to emit equal to or greater than ten (10) tons per year of a single HAP and twenty-five (25) tons per year of any combination of HAPs.

(b) Approval to Operate

Pursuant to 326 IAC 2-7-12(d)(1), this change to the permit is being made through a Significant Permit Modification because this modification does not qualify as a Minor Permit Modification or as an Administrative Amendment.

## Permit Level Determination – PSD

The table below summarizes the potential to emit of the modification, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of the Part 70 source and permit modification, and only to the extent that the effect of the control equipment is made practically enforceable in the permit. If the control equipment has been determined to be integral, the table reflects the potential to emit (PTE) after consideration of the integral control device.

<table>
<thead>
<tr>
<th>Process / Emission Unit</th>
<th>PM$^*$</th>
<th>PM$_{10}^*$</th>
<th>PM$_{2.5}^*$</th>
<th>SO$_2$</th>
<th>NO$_X$</th>
<th>VOC</th>
<th>CO</th>
<th>PSD Major Source Thresholds</th>
</tr>
</thead>
<tbody>
<tr>
<td>3 Gel Coat (LVLP) guns in SG3</td>
<td>5.46</td>
<td>5.46</td>
<td>5.46</td>
<td>-</td>
<td>-</td>
<td>&lt; 250</td>
<td>-</td>
<td>250</td>
</tr>
<tr>
<td>3 Gel Coat (LVLP) guns in SG5</td>
<td>10.92</td>
<td>10.92</td>
<td>10.92</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Horizontal Tank T3</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>0.04</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td><strong>Total for Modification</strong></td>
<td><strong>16.38</strong></td>
<td><strong>16.38</strong></td>
<td><strong>16.38</strong></td>
<td>-</td>
<td>-</td>
<td>&lt;250</td>
<td>-</td>
<td>250</td>
</tr>
<tr>
<td>PSD Major Source Thresholds</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
</tr>
</tbody>
</table>
The source opted to take VOC limits in order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable to this modification. See Technical Support Document (TSD) State Rule Applicability - Entire Source section, 326 IAC 2-2 (PSD) for more information regarding the limits.

This modification to an existing minor PSD stationary source is not major because the emissions increase of each PSD regulated pollutant is less than the PSD major source threshold. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

### PTE of the Entire Source after Issuance of the Part 70 Modification

The table below summarizes the after issuance source-wide potential to emit, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of the Part 70 source and permit modification, and only to the extent that the effect of the control equipment is made practically enforceable in the permit. If the control equipment has been determined to be integral, the table reflects the potential to emit (PTE) after consideration of the integral control device.

#### Source-Wide Emissions After Issuance (ton/year)

<table>
<thead>
<tr>
<th>Process / Emission Unit</th>
<th>PM$^1$</th>
<th>PM$_{10}^1$</th>
<th>PM$_{2.5}^{1,2}$</th>
<th>SO$_2$</th>
<th>NO$_X$</th>
<th>VOC</th>
<th>CO</th>
<th>Single HAP$^3$</th>
<th>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Line 1</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Line 1, gun SG1A, Resin Application</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Line 1, gun SG1B, Resin Application</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Line 1, gun SG1C, Resin Application</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Line 1, Booth SG3, Gel Coat (LVLP) guns</td>
<td>5.46</td>
<td>5.46</td>
<td>5.46</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td></td>
<td>125.51</td>
<td>126.40</td>
</tr>
<tr>
<td>Gel Coat Touch Up Areas P1GT1-P1GT8</td>
<td>1.29</td>
<td>1.29</td>
<td>1.29</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td></td>
<td>0.45</td>
<td>0.45</td>
</tr>
<tr>
<td>Mold Maintenance Area - Release Application</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Resin Mix Tanks (SM1)</td>
<td>1.49</td>
<td>1.49</td>
<td>1.49</td>
<td>-</td>
<td>-</td>
<td>3.36</td>
<td></td>
<td>3.36</td>
<td>3.36</td>
</tr>
<tr>
<td>Resin Storage Tanks (T4)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>0.05</td>
<td></td>
<td>0.05</td>
<td>0.05</td>
</tr>
<tr>
<td>New Resin Horizontal Tank (T3)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>0.04</td>
<td></td>
<td>0.04</td>
<td>0.04</td>
</tr>
<tr>
<td>Natural Gas Combustion</td>
<td>0.07</td>
<td>0.30</td>
<td>0.30</td>
<td>0.02</td>
<td>3.91</td>
<td>0.21</td>
<td>3.28</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Fiberglass Cutting Operations/Woodworking</td>
<td>15.08</td>
<td>15.08</td>
<td>15.08</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Source-Wide Emissions After Issuance (ton/year)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
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<tr>
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<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>PM(^1)</td>
<td>PM(_{10})(^1)</td>
<td>PM(_{2.5})(^1, 2)</td>
<td>SO(_2)</td>
<td>NO(_X)</td>
<td>VOC</td>
<td>CO</td>
<td>Single HAP(^3)</td>
<td>Total HAPs</td>
<td></td>
</tr>
<tr>
<td>Line 1</td>
<td>Line 2</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Line 2, guns SG7 and SG8, Resin Application</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>596.59</td>
<td>608.69</td>
<td></td>
</tr>
<tr>
<td>Line 2, gun SG9, Resin Application</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>119.18</td>
<td>119.70</td>
<td></td>
</tr>
<tr>
<td>Line 2, Booth SG5, Gel Coat (LVLP) guns</td>
<td>10.92</td>
<td>10.92</td>
<td>10.92</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>251.02</td>
<td>252.80</td>
<td></td>
</tr>
<tr>
<td>Gel Coat Touch Up Areas P1GT1-P1GT8</td>
<td>2.57</td>
<td>2.57</td>
<td>2.57</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>0.89</td>
<td>0.89</td>
<td></td>
</tr>
<tr>
<td>Mold Maintenance Area - Fiberglass</td>
<td>4.00</td>
<td>4.00</td>
<td>4.00</td>
<td>-</td>
<td>-</td>
<td>*</td>
<td>1.52</td>
<td>1.59</td>
<td></td>
</tr>
<tr>
<td>Mold Maintenance Area - Release Application</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>5.82</td>
<td>-</td>
<td>-</td>
<td>1.61</td>
</tr>
<tr>
<td>Resin Storage Tanks (T1 &amp; T2)</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>0.07</td>
<td>-</td>
<td>0.07</td>
<td>0.07</td>
</tr>
<tr>
<td>Natural Gas Combustion</td>
<td>0.06</td>
<td>0.25</td>
<td>0.25</td>
<td>0.02</td>
<td>3.26</td>
<td>0.18</td>
<td>2.74</td>
<td>0.06</td>
<td>0.06</td>
</tr>
<tr>
<td>Welding and Flame Cutting</td>
<td>0.23</td>
<td>0.23</td>
<td>0.23</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>0.002</td>
</tr>
<tr>
<td>Woodworking Operations</td>
<td>0.15</td>
<td>0.15</td>
<td>0.15</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Cutting Operations</td>
<td>0.76</td>
<td>0.76</td>
<td>0.76</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td><strong>Total PTE of Entire Source Excluding Fugitives</strong></td>
<td>42.10</td>
<td>42.51</td>
<td>42.51</td>
<td>0.04</td>
<td>7.17</td>
<td>&lt;250</td>
<td>6.02</td>
<td>1277.69</td>
<td>1296.19</td>
</tr>
<tr>
<td>Title V Major Source Thresholds</td>
<td>NA</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>10</td>
<td>25</td>
</tr>
<tr>
<td>PSD Major Source Thresholds</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>--</td>
<td>--</td>
</tr>
</tbody>
</table>

1Under the Part 70 Permit program (40 CFR 70), PM\(_{10}\) and PM\(_{2.5}\), not particulate matter (PM), are each considered as a "regulated air pollutant."

2PM\(_{2.5}\) listed is direct PM\(_{2.5}\).

3Single highest source-wide HAP *Fugitive HAP emissions are always included in the source-wide emissions.

*The mold maintenance emissions in fiberglass production are included in the Limited emissions of Lines 1 and 2.

The source opted to take limit(s) in order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable to this source. See Technical Support Document (TSD) State Rule Applicability - Entire Source section, 326 IAC 2-2 (PSD) for more information regarding the limits.

(a) This existing minor PSD stationary source will continue to be minor under 326 IAC 2-2 because the emissions of each PSD regulated pollutant will continue to be less than the PSD major source thresholds.
(b) This existing major source of HAP will continue to be a major source of HAP, as defined in 40 CFR 63.2, because HAP emissions will continue to be equal to or greater than ten (10) tons per year for any single HAP and/or equal to or greater than twenty-five (25) tons per year of a combination of HAPs. Therefore, this source is a major source under Section 112 of the Clean Air Act (CAA).

### Federal Rule Applicability Determination

Due to the modification at this source, federal rule applicability has been reviewed as follows:

#### New Source Performance Standards (NSPS):

(a) The requirements of the New Source Performance Standard for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification commenced After July 23, 1984, 40 CFR 60.110b, Subpart Kb are not included in the permit for the horizontal polyester resin storage tank T3, because it has a capacity of less than the applicability volume of 75 m³ (19,812.9 gallons).

(b) There are no other New Source Performance Standards (40 CFR Part 60) and 326 IAC 12 included in the permit for this proposed modification.

#### National Emission Standards for Hazardous Air Pollutants (NESHAP):

(c) The six (6) new gel coat applicators and one (1) polymer resin tank, T3 are subject to the National Emission Standards for Hazardous Air Pollutants for Reinforced Plastic Composites Production, 40 CFR 63, Subpart WWWW which is incorporated by reference as 326 IAC 20-56, because they are located in a major source of HAPs that operates a reinforced plastic composites production facility. The units subject to this rule include the followings:

(i) Three (3) stationary mechanical lesser atomized applicators, approved in 2019 for construction, located in gel coat application booth identified as SG3, exhausting to one (1) stack identified as SG3X. The booth is also equipped with dry filters for particulate control.

(ii) Three (3) stationary mechanical lesser atomized applicators, approved in 2019 for construction, located in gel coat application booth identified as SG5, exhausting to one (1) stack identified as SG5X. The booth is also equipped with dry filters for particulate control.

(iii) One (1) polyester resin storage tank, identified as T3, approved in 2019 for construction, with a maximum capacity of 5,880 gallons, and exhausting to stack T3S

These emission units, identified as SG3, SG5 and T3 are subject to the following portions of 40 CFR 63, Subpart WWWW.

1. 40 CFR 63.5780
2. 40 CFR 63.5785(a)
3. 40 CFR 63.5790
4. 40 CFR 63.5795(b)
5. 40 CFR 63.5796
6. 40 CFR 63.5797
7. 40 CFR 63.5798
8. 40 CFR 63.5799(b) and (c)
9. 40 CFR 63.5800
10. 40 CFR 63.5805(b) and (g)
11. 40 CFR 63.5810
12. 40 CFR 63.5835(a) and (c)
The requirements of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated as 326 IAC 20-1, apply to the units described above except as otherwise specified in 40 CFR 63, Subpart WWWW.

(d) There are no other National Emission Standards for Hazardous Air Pollutants under 40 CFR 63, 326 IAC 14 and 326 IAC 20 included for this proposed modification.

**Compliance Assurance Monitoring (CAM):**

(e) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to each pollutant-specific emission unit that meets the following criteria:

1. has a potential to emit before controls equal to or greater than the major source threshold for the regulated pollutant involved;
2. is subject to an emission limitation or standard for that pollutant (or a surrogate thereof); and
3. uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.

(f) Pursuant to 40 CFR 64.2(b)(1)(i), emission limitations or standards proposed after November 15, 1990 pursuant to a NSPS or NESHAP under Section 111 or 112 of the Clean Air Act are exempt from the requirements of CAM. Therefore, an evaluation was not conducted for any emission limitations or standards proposed after November 15, 1990 pursuant to a NSPS or NESHAP under Section 111 or 112 of the Clean Air Act.

The following table is used to identify the applicability of CAM to new and modified emission unit and each emission limitation or standard for a specified pollutant based on the criteria specified under 40 CFR 64.2:

<table>
<thead>
<tr>
<th>Emission Unit/Pollutant</th>
<th>Control Device</th>
<th>Applicable Emission Limitation</th>
<th>Uncontrolled PTE (tons/year)</th>
<th>Controlled PTE (tons/year)</th>
<th>CAM Applicable (Y/N)</th>
<th>Large Unit (Y/N)</th>
</tr>
</thead>
<tbody>
<tr>
<td>SG 3 gel coat guns, PM*</td>
<td>DC</td>
<td>none</td>
<td>109.25</td>
<td>5.46</td>
<td>N</td>
<td>N</td>
</tr>
</tbody>
</table>
### Emission Unit/Pollutant

<table>
<thead>
<tr>
<th>Emission Unit/Pollutant</th>
<th>Control Device</th>
<th>Applicable Emission Limitation</th>
<th>Uncontrolled PTE (tons/year)</th>
<th>Controlled PTE (tons/year)</th>
<th>CAM Applicable (Y/N)</th>
<th>Large Unit (Y/N)</th>
</tr>
</thead>
<tbody>
<tr>
<td>SG 3 gel coat guns, PM10 &amp; PM2.5</td>
<td>DC</td>
<td>none</td>
<td>109.25</td>
<td>5.46</td>
<td>N</td>
<td>N</td>
</tr>
<tr>
<td>SG5 gel coat guns, PM*</td>
<td>DC</td>
<td>none</td>
<td>218.50</td>
<td>10.92</td>
<td>N</td>
<td>N</td>
</tr>
<tr>
<td>SG5 gel coat guns, PM10 &amp; PM2.5</td>
<td>DC</td>
<td>none</td>
<td>218.50</td>
<td>10.92</td>
<td>N</td>
<td>N</td>
</tr>
</tbody>
</table>

Under the Part 70 Permit program (40 CFR 70), PM is not a regulated pollutant. Uncontrolled PTE (tpy) and controlled PTE (tpy) are evaluated against the Major Source Threshold for each pollutant. Major Source Threshold for criteria pollutants (PM10, PM2.5, SO2, NOx, VOC and CO) is 100 tpy, for a single HAP ten (10) tpy, and for total HAPs twenty-five (25) tpy.

PM* For limitations under 326 IAC 6-3-2, 326 IAC 6.5, and 326 IAC 6.8, IDEM OAQ uses PM as a surrogate for the regulated air pollutant PM10. Therefore, uncontrolled PTE and controlled PTE reflect the emissions of the regulated air pollutant PM10.

**Controls:** DC = Dust Collection System

Emission units without air pollution controls are not subject to CAM. Therefore, they are not listed.

Based on this evaluation, the requirements of 40 CFR Part 64, CAM, are not applicable to any of the new units as part of this modification.

---

### State Rule Applicability - Entire Source

Due to this modification, state rule applicability has been reviewed as follows:

**326 IAC 2-2 (PSD)**
PSD applicability is discussed under the Permit Level Determination – PSD Section of this document.

The dry filters shall be in operation and control the particulate emissions of the new gel coat applicators in SG3 and SG5 at all times the gel coat applicators are in operation.

**326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))**
The provisions of 326 IAC 2-4.1 apply to any owner or operator who constructs or reconstructs a major source of hazardous air pollutants (HAP), as defined in 40 CFR 63.41, after July 27, 1997, unless the major source has been specifically regulated under or exempted from regulation under a NESHAP that was issued pursuant to Section 112(d), 112(h), or 112(j) of the Clean Air Act (CAA) and incorporated under 40 CFR 63. On and after June 29, 1998, 326 IAC 2-4.1 is intended to implement the requirements of Section 112(g)(2)(B) of the Clean Air Act (CAA).

The operation of this source will emit equal to or greater than ten (10) tons per year for a single HAP AND/OR equal to or greater than twenty-five (25) tons per year for a combination of HAPs. Therefore, 326 IAC 2-4.1 would apply to this source. However, pursuant to 326 IAC 2-4.1-1(b)(2), because this source is specifically regulated under NESHAP 40 CFR 63, Subpart WWWW, which was issued pursuant to Section 112(d), 112(h), or 112(j) of the CAA, this source is exempt from the requirements of 326 IAC 2-4.1.

**326 IAC 2-7-6(5) (Annual Compliance Certification)**
The U.S. EPA Federal Register 79 FR 54978 notice does not exempt Title V Permittees from the requirements of 40 CFR 70.6(c)(5)(iv) or 326 IAC 2-7-6(5)(D), but the submittal of the Title V annual compliance certification to IDEM satisfies the requirement to submit the Title V annual compliance certifications to EPA. IDEM does not intend to revise any permits since the requirements of 40 CFR 70.6(c)(5)(iv) or 326 IAC 2-7-6(5)(D) still apply, but Permittees can note on their Title V annual compliance certifications that submission to IDEM has satisfied reporting to EPA per Federal Register 79 FR 54978. This only applies to Title V Permittees and Title V compliance certifications.
326 IAC 6-4 (Fugitive Dust Emissions Limitations)
Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4.

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)
This source is not subject to the requirements of 326 IAC 6-5, because the source has potential fugitive particulate emissions of less than twenty-five (25) tons per year.

State Rule Applicability – Individual Facilities

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(a), the requirements of 326 IAC 6-3-2 are applicable to the new gel coat applicators in SG3 and SG5, since they are manufacturing processes not exempted from this rule under 326 IAC 6-3-1(b) and are not subject to a particulate matter limitation that is as stringent as or more stringent than the particulate limitation established in this rule as specified in 326 IAC 6-3-1(c).

Pursuant to 326 IAC 6-3-2(d), particulate from the new gel coat applicators in SG3 and SG5 shall be controlled by a dry particulate filter, waterwash or an equivalent control device and the Permittee shall operate the control device in accordance with manufacturer's specifications.

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
Even though, the new gel coat applicators in SG3 and SG5 were constructed after January 1, 1980 and their potential VOC emissions exceed twenty-five (25) tons per year, they are not subject to the requirements of 326 IAC 8-1-6 because these units are regulated by another provision in 326 IAC 20-56.

326 IAC 8-9 (Volatile Organic Liquid Storage Vessels)
The new horizontal polyester resin storage tank, identified as T3, is not subject to the requirements of 326 IAC 8-9 because it is not located in any of the listed counties: Clark, Floyd, Lake and Porter counties.

326 IAC 20-56 (Reinforced Plastic Composites Production)
The new gel coat applicators in SG3 and SG5 and the new resin tank identified as T3 are subject to the requirements of 326 IAC 20-56 because these units are utilized in reinforced plastic composites production and are located at a major source of HAP emissions. Pursuant to 326 IAC 20-56(1)(a), the Permittee shall comply with the operator training requirements stipulated in 326 IAC 20-56-2.

Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-7 are required to assure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions; however, these provisions do not always fulfill the requirement for a continuous demonstration. When this occurs, IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

If the Compliance Determination Requirements are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source’s failure to take the appropriate corrective actions within a specific time period.

(a) The Compliance Determination Requirements applicable to this modification are as follows:

Testing is not required for this source for reason as follows:
(1) The new gel coat applicators in SG3 and SG5 can comply with the applicable 326 IAC 2-2 minor PM/PM10/PM2.5 limits with controls at 95% efficiency or less.

The dry filters for the gel coat applicators shall be in operation and control the particulate emissions of the gel coat applicators in SG3 and SG5 at all times the gel coat applicators are in operation.

(b) The Compliance Monitoring Requirements applicable to this proposed modification are as follows:

<table>
<thead>
<tr>
<th>Control Device</th>
<th>Type of Monitoring</th>
<th>Frequency</th>
<th>Range or Specification</th>
</tr>
</thead>
<tbody>
<tr>
<td>Surface Coating Dry Filters for SG3 and SG5</td>
<td>Dry Filter Inspections</td>
<td>Daily</td>
<td>Verify the placement, integrity and particle loading of the filters</td>
</tr>
<tr>
<td></td>
<td>Observations for stack overspray</td>
<td>Weekly</td>
<td>Verify if there is an overspray condition that should result in a response</td>
</tr>
<tr>
<td></td>
<td>Inspections for stack emissions and presence of overspray</td>
<td>Monthly</td>
<td>Verify if there is a noticeable change in overspray emissions or evidence of overspray</td>
</tr>
</tbody>
</table>

This monitoring condition is necessary because the dry filters for the gel coat applicators in SG3 and SG5 must operate properly to assure compliance with 326 IAC 2-2 (Prevention of Significant Deterioration) and 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes).

### Proposed Changes

As part of this permit approval, the permit may contain new or different permit conditions and some conditions from previously issued permits/approvals may have been corrected, changed, or removed. These corrections, changes, and removals may include Title I changes.

The following changes listed below are due to the proposed modification. Deleted language appears as strikethrough text and new language appears as bold text (these changes may include Title I changes):

**Change 1:** Conditions A.2, A.3, and A.4 have been modified to update the descriptive information of the emission units:

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(14)]

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

**Plant Line 1:**

(a) One (1) fiberglass production line, identified as Line 1, installed in February 1998, approved for modification in 2014, moved to plant 1 in 2017 with a maximum production rate of 15 fiberglass units per hour, including:

(1) One (1) chop resin application booth, identified as SG1, consisting of:

(i) (A) one (1) non-atomized fluid impingement chop gun, identified as SG1A, installed in February 1998, and

(ii) (B) one (1) non-atomized fluid impingement chop gun, identified as SG1B, approved for installation in 2014.

(iii) (C) one (1) non-atomized fluid impingement chop gun, identified as SG1C, approved in 2018 for construction.

This chop resin application booth is equipped with dry filters for particulate
control exhausting to one (1) stack identified as SG1X.

One (1) gel coat application booth, identified as SG3, consisting of two (2) stationary non-atomized fluid impingement applicators, installed in February 1998, and two (2) portable non-atomized fluid impingement applicators, installed in 2003, using a maximum of two applicators at a time, exhausting to one (1) stack identified as SG3X. The booth is also equipped with dry filters for particulate control.

One (1) gel coat application booth, identified as SG3, consisting of three (3) stationary mechanical lesser atomized applicators, approved in 2019 for construction, exhausting to one (1) stack identified as SG3X. The booth is also equipped with dry filters for particulate control.

[Under 40 CFR 63, Subpart WWWW, this line 1 is considered an affected source.]

Fiberglass Cutting Operations, controlled by dust collector identified as P1DC1 DC1, exhausting outdoors through stack P1DC1S DC1S, consisting of the following:

(a) One (1) trim booth, identified as T1, constructed in 1998, and moved to Plant 1 in 2017, utilizing:

**********

Plant Line 2 (relocated to 1445 Polk Drive, Warsaw, IN in 2018):

(c) One (1) fiberglass production line, identified as Line 2, installed in July 1999, with a maximum production rate of 30 fiberglass units per hour, including:

(1) One (1) chop resin application booth, consisting of three (3) non-atomized fluid impingement chop guns, identified as SG7, SG8, and SG9, producing up to 30 fiberglass units per hour per gun, and exhausting to seven (7) stacks identified as SG7X, SG8X, SG9X, SG2XA-SG2XD. The booth is also equipped with dry filters for particulate control.

(2) One (1) gel coat application booth, identified as SG5, consisting of two (2) stationary non-atomized fluid impingement applicators and two (2) portable non-atomized fluid impingement, using two applicators at a time, exhausting to one (1) stack identified as SG5X. The booth is also equipped with dry filters for particulate control.

One (1) gel coat application booth, identified as SG5, consisting of three (3) stationary mechanical lesser atomized applicators, approved in 2019 for construction, exhausting to one (1) stack identified as SG5X. The booth is also equipped with dry filters for particulate control.

[Under 40 CFR 63, Subpart WWWW, this line 2 is considered an affected source.]

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-7-4(c)][326 IAC 2-7-5(14)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

Plant Line 1:

(a) Cleaners and solvents with a combined maximum capacity of 43 gallons per 12 months, moved to Plant 1 in 2017 as follows:

**********

(c) Storage tanks as follows:
(1) One (1) polyester resin storage tank, identified as T3, approved in 2017 for construction, with a maximum capacity of 4,100 gallons, and exhausting to stack T3S.

(1) One (1) horizontal polyester resin storage tank, identified as T3, approved in 2019 for construction, with a maximum capacity of 5,880 gallons, and exhausting to stack T3S.

[Under 40 CFR 63, Subpart WWWW, this storage tank is considered an affected source.]

(2) One (1) polyester resin storage tank, identified as T4, approved in 2018 for construction, with a maximum capacity of 5,880 gallons, and exhausting to stack T4S.

[Under 40 CFR 63, Subpart WWWW, this storage tank is considered an affected source.]

Plant Line 2:
(d) Cleaners and solvents with a combined maximum capacity of 97 gallons per 12 months, as follows:

**********
(f) One (1) resin mix tanks for mixing resin with inert ingredients, identified as follows:
(1) Resin Sheer Mix Tank - Line 2 (SM2). [326 IAC 6-3-2]
[Under 40 CFR 63, Subpart WWWW, this resin mix tank is considered an affected source.]

(g) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals (kPa) measured at 38 degrees C).

A.4 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(3)(I)]
This stationary source also includes the following insignificant activities:

Plant Line 1:
(a) Natural gas-fired combustion sources, approved in 2017 for construction, consisting of comfort heaters and an air makeup unit, with a combined total rating of 9.1 million British thermal units (MMBtu) per hour.

(b) Eight (8) gel coat touch up repair stations, identified as P1GT1-P1GT8 L1GT1 through L1GT8, with a maximum capacity of 15 fiberglass units per hour, and uncontrolled.

Plant Line 2:
(c) Natural gas-fired combustion sources, consisting of the following:

(1) Two (2) air makeup units, identified as P2AM1 and P2AM2 L2AM1 and L2AM2, rated at 2.75 MMBtu per hour, each;

(2) Four (4) Thermocycler units, identified as P2TC1-P2TC4 L2TC1 and L2TC2, rated at 0.75 MMBtu per hr, each;

(3) Four (4) space heating units, identified as P2SH1-P2SH4 L2SH1 through L2SH4, rated at 0.15 MMBtu per hr, each.

(d) Welding operations related to routine fabrication, maintenance and repair of buildings, structures, equipment or vehicles at the source where air emissions from those activities would not be associated with any commercial production process.

(e) Woodworking operations as follows:
One trim booth, identified as T2, constructed in 1998, controlled by dust collector identified as P1DC1, exhausting outdoors through stack P1DC1S, consisting of:

(A) Two (2) trimmer saws, each with a throughput capacity of 969 pounds per hour; and

(B) Two (2) hand grinders, each with a throughput capacity of 969 pounds per hour.

One saw room, identified as SR, constructed in 1998, with an integral control consisting of one internal dust collection system for particulate control, exhausting indoors. This saw room consists of:

(A) One (1) table saw, with a maximum capacity of 200 pounds of wood per hour; and

(B) One (1) radial saw, with a maximum capacity of 200 pounds of wood per hour.

One small table saw, identified as TS, constructed in 1998 and located in the Whirlpool area, with a throughput capacity of 300 pounds reinforced polyester plastic per hour, uncontrolled and not exhausting to a stack.

One small circular saw, identified as CS, constructed in 1998 and located in the final finish area, with a throughput capacity of 150 pounds reinforced polyester plastic per hour, uncontrolled and not exhausting to a stack.

Eight (8) gel coat touch up repair stations, identified as P2GT1-P2GT8 L2GT1 through L2GT8, with a maximum capacity of 30 fiberglass units per hour, and uncontrolled.

Change 2: Condition D.1 has been modified to incorporate the changes in the unit descriptive information and rule applicability:

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Plant Line 1:

(a) One (1) fiberglass production line, identified as Line 1, installed in February 1998, approved for modification in 2014, moved to plant 1 in 2017 with a maximum production rate of 15 fiberglass units per hour, including:

(1) One (1) chop resin application booth, identified as SG1, consisting of:

(A) One (1) non-atomized fluid impingement chop gun, identified as SG1A, installed in February 1998, and

(B) one (1) non-atomized fluid impingement chop gun, identified as SG1B, approved for installation in 2014.

(C) one (1) non-atomized fluid impingement chop gun, identified as SG1C, approved in 2018 for construction.

This chop resin application booth is equipped with dry filters for particulate control exhausting to one (1) stack identified as SG1X.
(2) One (1) gel coat application booth, identified as SG3, consisting of two (2) stationary non-atomized fluid impingement applicators, installed in February 1998, and two (2) portable non-atomized fluid impingement applicators, installed in 2003, using a maximum of two applicators at a time, exhausting to one (1) stack identified as SG3X. The booth is also equipped with dry filters for particulate control.

One (1) gel coat application booth, identified as SG3, consisting of three (3) stationary mechanical lesser atomized applicators, approved in 2019 for construction, exhausting to one (1) stack identified as SG3X. The booth is also equipped with dry filters for particulate control.

[Under 40 CFR 63, Subpart WWWW, this line 1 is considered an affected source.]

Plant Line 2:

(c) One (1) fiberglass production line, identified as Line 2, installed in July 1999, with a maximum production rate of 30 fiberglass units per hour, including:

(1) One (1) chop resin application booth, consisting of three (3) non-atomized fluid impingement chop guns, identified as SG7, SG8, SG9, producing up to 30 fiberglass units per hour per gun, and exhausting to seven (7) stacks identified as SG7X, SG8X, SG9X, and SG2XA-SG2XD. The booth is also equipped with dry filters for particulate control.

(2) One (1) gel coat application booth, identified as SG5, consisting of two (2) stationary non-atomized fluid impingement applicators and two (2) portable non-atomized fluid impingement applicators using two applicators at a time, exhausting to one (1) stack identified as SG5X. The booth is also equipped with dry filters for particulate control.

One (1) gel coat application booth, identified as SG5, consisting of three (3) stationary mechanical lesser atomized applicators, approved in 2019 for construction, exhausting to one (1) stack identified as SG5X. The booth is also equipped with dry filters for particulate control.

[Under 40 CFR 63, Subpart WWWW, this line 2 is considered an affected source.]

Insignificant Activities:

Plant Line 1:

(a) Cleaners and solvents with a combined maximum capacity of 43 gallons per 12 months, moved to plant 1 in 2017 as follows:

(c) One (1) storage tank as follows:

(1) One (1) polyester resin storage tank, identified as T3, approved in 2017 for construction, with a maximum capacity of 4,100 gallons, and exhausting to stack T3S.

(1) One (1) horizontal polyester resin storage tank, identified as T3, approved in 2019 for construction, with a maximum capacity of 5,880 gallons, and exhausting to stack T3S.

[Under 40 CFR 63, Subpart WWWW, this storage tank is considered an affected source.]

Plan Line 2:
(d) Cleaners and solvents with a combined maximum capacity of 97 gallons per 12 months, as follows:

(f) One (1) resin mix tanks for mixing resin with inert ingredients, identified as follows:

(1) Resin Sheer Mix Tank – Line 2 (SM2). [326 IAC 6-3-2]

[Under 40 CFR 63, Subpart WWWW, this resin mix tank is considered an affected source.]

(g) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals (kPa) measured at 38 degrees C).

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

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

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6][326 IAC 20-56]

Pursuant to SSM No. 085-28953-00077, issued on August 19, 2010, SSM 085-34118-00077, and 326 IAC 8-1-6 (New Facilities; General Reduction Requirements), the best available control technology (BACT) for VOC emissions from the Line 1 fiberglass production line (SG1 and SG3) and the Line 2 fiberglass production line (SG5, SG7, and SG8) shall be as follows:

D.1.3 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e), the manufacturing processes listed in the table below shall be limited by the following:

<table>
<thead>
<tr>
<th>Unit (ID)</th>
<th>Maximum Process Weight Rate (ton/hr)</th>
<th>326 IAC 6-3-2 Allowable PM Rate (lb/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Resin Sheer Mix Tank – Line 2 (SM2)</td>
<td>0.85</td>
<td>3.68</td>
</tr>
</tbody>
</table>

The pounds per hour limitations were calculated using the following equation:

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

\[ E = 4.10 P^{0.67} \]

where \( E \) = rate of emission in pounds per hour and \( P \) = process weight rate in tons per hour

D.1.3 Particulate Matter (PM) [326 IAC 6-3][326 IAC 2-2]

Pursuant to 326 IAC 6-3-2(d), particulate emissions from the gel coat applicators in SG3 and SG5 shall be controlled by a particulate filter, waterwash, or an equivalent control device, and the source shall operate it in accordance with the manufacturer’s specifications.

D.1.6 Particulate Control

In order to ensure compliance with Condition D.1.3, the dry filters for the gel coat applicators in SG3 and SG5 shall be in operation and control emissions from the gel coat applicators in SG3 and SG5 at all times the gel coat applicators are in operation.
Compliance Monitoring Requirements [326 IAC 2-7-5(3)]

D.1.7 Monitoring

<table>
<thead>
<tr>
<th>Monitoring Requirement</th>
</tr>
</thead>
<tbody>
<tr>
<td>(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the gel coat booths SG3 and SG5 stacks (SG3X and SG5X) while one or more of the booths are in operation. If a condition exists which should result in a response, the Permittee shall take a reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.</td>
</tr>
<tr>
<td>(b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take a reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.</td>
</tr>
</tbody>
</table>

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

D.1.6 8 Record Keeping Requirements

<table>
<thead>
<tr>
<th>Record Keeping Requirement</th>
</tr>
</thead>
<tbody>
<tr>
<td>(c) To document the compliance status with Condition D.1.3 and D.1.7, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections.</td>
</tr>
<tr>
<td>(c d) Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to the records required by this condition.</td>
</tr>
</tbody>
</table>

D.1.7 9 Reporting Requirements

<table>
<thead>
<tr>
<th>Reporting Requirement</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Change 3:</strong> Condition D.2 has been modified to incorporate the changes in the unit descriptive information and rule applicability:</td>
</tr>
</tbody>
</table>

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

<table>
<thead>
<tr>
<th>Emissions Unit Description</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Plant Line 1:</strong></td>
</tr>
<tr>
<td>(b) Fiberglass Cutting Operations, controlled by dust collector identified as P1DC1, exhausting outdoors through stack P1DC1S DC1S, consisting of the following:</td>
</tr>
<tr>
<td><strong>Insignificant Activity:</strong></td>
</tr>
<tr>
<td><strong>Plant Line 2:</strong></td>
</tr>
<tr>
<td>(e) Woodworking operations as follows:</td>
</tr>
<tr>
<td>(1) One trim booth, identified as T2, constructed in 1998, with an integral control using one (1) cartridge filter system for particulate control, exhausting indoors controlled by dust collector identified as DC1, exhausting outdoors through stack DC1S, consisting of:</td>
</tr>
</tbody>
</table>
(A) Two (2) trimmer saws, each with a throughput capacity of 969 pounds per hour; and

(B) Two (2) hand grinders, each with a throughput capacity of 969 pounds per hour.

(2) One (1) saw room, identified as SR2, constructed in 1998, with an integral control consisting of one internal dust collection system for particulate control, exhausting indoors. This saw room consists of:

(A) One (1) table saw, with a maximum capacity of 200 pounds of wood per hour; and

(B) One (1) radial saw, with a maximum capacity of 200 pounds of wood per hour.

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

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

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

D.2.3 Particulate Control

In order to ensure that the trim booths, identified as T1 and T2 and the saw room identified as SR2 SR1 shall comply with the requirements of 326 IAC 6-3-2, the integral cartridge filter system and internal dust collection system for particulate control, identified as DC1, DC2 and DC3 shall be in operation and control emissions from the trim booths and the saw room at all times the trim booths and the saw room are in operation.

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

D.2.5 Visible Emissions Notations

(a) Visible emission notations of baghouse P1DC1 DC1 stack exhaust shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

Change 4: Condition E.1 has been modified to incorporate the changes in the descriptive information of the emission units:

SECTION E.1

Emissions Unit Description:

Plant Line 1:

(a) One (1) fiberglass production line, identified as Line 1, installed in February 1998, approved for modification in 2014, moved to Plant 1 in 2017 with a maximum production rate of 15 fiberglass units per hour, including:

(1) One (1) chop resin application booth, identified as SG1, consisting of:

(A) one (1) non-atomized fluid impingement chop gun, identified as SG1A, installed in February 1998, and
(iii) (C) one (1) non-atomized fluid impingement chop gun, identified as SG1C, approved for construction in 2018.

This chop resin application booth is equipped with dry filters for particulate control exhausting to one (1) stack identified as SG1X.

(2) One (1) gel coat application booth, identified as SG3, consisting of two (2) stationary non-atomized fluid impingement applicators, installed in February 1998, and two (2) portable non-atomized fluid impingement applicators, installed in 2003, using a maximum of two applicators at a time, exhausting to one (1) stack identified as SG3X. The booth is also equipped with dry filters for particulate control.

One (1) gel coat application booth, identified as SG3, consisting of three (3) stationary mechanical lesser atomized applicators, approved in 2019 for construction, exhausting to one (1) stack identified as SG3X. The booth is also equipped with dry filters for particulate control.

[Under 40 CFR 63, Subpart WWWW, this line 1 is considered an affected source.]

**Plant Line 2:**

(b) One (1) fiberglass production line, identified as Line 2, installed in July 1999, with a maximum production rate of 30 fiberglass units per hour, including:

(1) One (1) chop resin application booth, consisting of three (3) non-atomized fluid impingement chop guns, identified as SG7, SG8, and SG9, producing up to 30 fiberglass units per hour per gun, and exhausting to seven (7) stacks identified as SG7X, SG8X, SG9X, and SG2XA-SG2XD. The booth is also equipped with dry filters for particulate control.

(2) One (1) gel coat application booth, identified as SG5, consisting of two (2) stationary non-atomized fluid impingement applicators and two (2) portable non-atomized fluid impingement applicators, using two applicators at a time, exhausting to one (1) stack identified as SG5X. The booth is also equipped with dry filters for particulate control.

One (1) gel coat application booth, identified as SG5, consisting of three (3) stationary mechanical lesser atomized applicators, approved in 2019 for construction, exhausting to one (1) stack identified as SG5X. The booth is also equipped with dry filters for particulate control.

[Under 40 CFR 63, Subpart WWWW, this line 2 is considered an affected source.]

**Insignificant Activities:**

**Plant Line 1:**

(a) Cleaners and solvents with a combined maximum capacity of 43 gallons per 12 months, as follows:

(1) having a vapor pressure equal to or less than 2 kPa; 15mm Hg; or 0.3 psi measured at 38°C (100°F) or;
(2) having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20°C (68°F);

[Under 40 CFR 63, Subpart WWWW, these cleaners and solvent are considered an affected source.]

(b) One (1) resin mix tanks for mixing resin with inert ingredients, moved to plant 1 in 2017 identified as follows:

(1) Resin Sheer Mix Tank - Line 1 (SM1).

[Under 40 CFR 63, Subpart WWWW, this resin mix tank is considered an affected source.]

(c) Storage tanks as follows:

(1) One (1) polyester resin storage tank, identified as T3, approved in 2017 for construction, with a maximum capacity of 4,100 gallons, and exhausting to stack T3S.

(1) One (1) horizontal polyester resin storage tank, identified as T3, approved in 2019 for construction, with a maximum capacity of 5,880 gallons, and exhausting to stack T3S.

[Under 40 CFR 63, Subpart WWWW, this storage tank is considered an affected source.]

(b) Eight (8) gel coat touch up repair stations, identified as P1GT1-P1GT8 L1GT1 through L1GT8, with a maximum capacity of 15 fiberglass units per hour, and uncontrolled

[Under 40 CFR 63, Subpart WWWW, these gel coat touch up repair stations are considered an affected source.]

Plant Line 2:
(e) Cleaners and solvents with a combined maximum capacity of 97 gallons per 12 months, as follows:

**********

(f) One (1) resin mix tanks for mixing resin with inert ingredients, identified as follows:

(1) Resin Sheer Mix Tank - Line 2 (SM2). [326 IAC 6-3-2]

[Under 40 CFR 63, Subpart WWWW, this resin mix tank is considered an affected source.]

(f) Eight (8) gel coat touch up repair stations, identified as P2GT1-P2GT8 L2GT1 through L2GT8, with a maximum capacity of 45 30 fiberglass units per hour, and uncontrolled

[Under 40 CFR 63, Subpart WWWW, these gel coat touch up repair stations are considered an affected source.]

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)
Additional Changes

IDEM, OAQ made additional changes to the permit as described below in order to update the language to match the most current version of the applicable rule, to eliminate redundancy within the permit, and to provide clarification regarding the requirements of these conditions.

Change 1: The Master Agency Interest ID number has been corrected.

<table>
<thead>
<tr>
<th>Significant Source Modification No.: 085-41958-00077</th>
</tr>
</thead>
<tbody>
<tr>
<td>Master Agency Interest ID.: 124902 49594</td>
</tr>
</tbody>
</table>

Issued by: Josiah K. Balogun, Section Chief
Permits Branch
Office of Air Quality

Conclusion and Recommendation

Unless otherwise stated, information 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 September 23, 2019. Additional information was received on October 29, 2019.

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Source Modification No. 085-41958-00077. The operation of this proposed modification shall be subject to the conditions of the attached proposed Significant Permit Modification No. 085-41960-00077.

The staff recommends to the Commissioner that the Part 70 Significant Source Modification and Significant Permit Modification be approved.

IDEM Contact

(a) If you have any questions regarding this permit, please contact Wilfredo de la Rosa, Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251, or by telephone at (317) 232-8422 or (800) 451-6027, and ask for Wilfredo de la Rosa or (317) 232-8422.

(b) A copy of the findings is available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/

(c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Air Permits page on the Internet at: http://www.in.gov/idem/2356.htm; and the Citizens’ Guide to IDEM on the Internet at: http://www.in.gov/idem/6900.htm.
### Appendix A: Emission Calculations

#### Summary of emissions after Modification

<table>
<thead>
<tr>
<th>Units</th>
<th>PM</th>
<th>PM10</th>
<th>PM2.5</th>
<th>SO2</th>
<th>NOx</th>
<th>VOC</th>
<th>CO</th>
<th>Total HAPs</th>
<th>Highest Single HAP (styrene)</th>
</tr>
</thead>
</table>

#### Line 1
- **Line 1, gun SGT1A, Resin Application**
  - 5.46 |
- **Line 1, gun SGT1B, Resin Application**
  - 5.46 |
- **Line 1, Booth SG1, Gel Coat (LVLP) guns**
  - 5.46 |
- **Mold Maintenance Area - Release Application**
  - 5.46 |
- **Resin Mix Tanks (SM1)**
  - 5.46 |
- **Resin Storage Tanks (T4)**
  - 5.46 |
- **New Resin Horizontal Tank (T3)**
  - 5.46 |
- **Gel Coat Touch Up Areas P1GT1-P1GT8**
  - 5.46 |
- **Line 2, Booth SG5, Gel Coat (LVLP) guns**
  - 5.46 |
- **Line 2, guns SG9, Resin Application**
  - 5.46 |

#### Line 2
- **Line 2, Booth SG6, Gel Coat (LVLP) guns**
  - 5.46 |
- **Mold Maintenance Area - Fiberglass**
  - 5.46 |
- **Resin Mix Tanks (SM1)**
  - 5.46 |
- **Resin Storage Tanks (T4)**
  - 5.46 |
- **New Resin Horizontal Tank (T3)**
  - 5.46 |
- **Gel Coat Touch Up Areas P1GT1-P1GT8**
  - 5.46 |
- **Line 2, Booth SG5, Gel Coat (LVLP) guns**
  - 5.46 |
- **Line 2, gun SG1B, Resin Application**
  - 5.46 |
- **Line 2, gun SG1A, Resin Application**
  - 5.46 |

#### Limited Potential to Emit (tons/year)

<table>
<thead>
<tr>
<th>Units</th>
<th>PM</th>
<th>PM10</th>
<th>PM2.5</th>
<th>SO2</th>
<th>NOx</th>
<th>VOC</th>
<th>CO</th>
<th>Total HAPs</th>
<th>Highest Single HAP (styrene)</th>
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</thead>
</table>

#### Potential to Emit after Modani Controls (tons/year)

<table>
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<th>PM</th>
<th>PM10</th>
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<th>SO2</th>
<th>NOx</th>
<th>VOC</th>
<th>CO</th>
<th>Total HAPs</th>
<th>Highest Single HAP (styrene)</th>
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</table>

#### Potential to Emit before Integral Controls (tons/year)

<table>
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<th>PM2.5</th>
<th>SO2</th>
<th>NOx</th>
<th>VOC</th>
<th>CO</th>
<th>Total HAPs</th>
<th>Highest Single HAP (styrene)</th>
</tr>
</thead>
</table>

---

*The mold maintenance emissions associated with the fiberglass production are included in the Limited PTE emissions of Line 1 and Line 2. The emissions from cleaners, solvents, and mold release agents are included in the Line 1 and Line 2 emission calculations.*

---

**Company Name:** Patrick Industries, Inc. dba Frontline Manufacturing  
**Source Address:** 1465 Polk Drive, Warsaw, Indiana 46580  
**Business Number:** 85-41968-00077  
**SPM Number:** 85-41960-00077  
**Reviewer:** Wilfredo de la Rosa

---

**Potential to Emit after Controls (tons/year)**

<table>
<thead>
<tr>
<th>Units</th>
<th>PM</th>
<th>PM10</th>
<th>PM2.5</th>
<th>SO2</th>
<th>NOx</th>
<th>VOC</th>
<th>CO</th>
<th>Total HAPs</th>
<th>Highest Single HAP (styrene)</th>
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</thead>
</table>

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**Potential to Emit before Integrals Controls (tons/year)**

<table>
<thead>
<tr>
<th>Units</th>
<th>PM</th>
<th>PM10</th>
<th>PM2.5</th>
<th>SO2</th>
<th>NOx</th>
<th>VOC</th>
<th>CO</th>
<th>Total HAPs</th>
<th>Highest Single HAP (styrene)</th>
</tr>
</thead>
</table>

---

**Limited Potential to Emit (tons/year)**

<table>
<thead>
<tr>
<th>Units</th>
<th>PM</th>
<th>PM10</th>
<th>PM2.5</th>
<th>SO2</th>
<th>NOx</th>
<th>VOC</th>
<th>CO</th>
<th>Total HAPs</th>
<th>Highest Single HAP (styrene)</th>
</tr>
</thead>
</table>
## Summary of Modification - PSD

**Company Name:** Patrick Industries, Inc. dba Frontline Manufacturing  
**Source Address:** 1445 Polk Drive, Warsaw, Indiana 46580  
**SSM Number:** 085-41958-00077  
**SPM Number:** 085-41960-00077  
**Reviewer:** Wilfredo de la Rosa

<table>
<thead>
<tr>
<th>Unit</th>
<th>PM</th>
<th>PM10</th>
<th>PM2.5</th>
<th>SO2</th>
<th>NOx</th>
<th>VOC</th>
<th>CO</th>
<th>Total HAPs</th>
<th>Highest Single HAP (styrene)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Line 1, Booth SG3, Gel Coat (LVLP) guns</td>
<td>109.25</td>
<td>109.25</td>
<td>109.25</td>
<td>--</td>
<td>--</td>
<td>132.55</td>
<td>--</td>
<td>126.40</td>
<td>125.51</td>
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<tr>
<td>Line 2, Booth SG5, Gel Coat (LVLP) guns</td>
<td>218.50</td>
<td>218.50</td>
<td>218.50</td>
<td>--</td>
<td>--</td>
<td>265.11</td>
<td>--</td>
<td>252.80</td>
<td>251.02</td>
</tr>
<tr>
<td>New Resin Horizontal Tank (T3)</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>0.04</td>
<td>--</td>
<td>0.04</td>
<td>0.04</td>
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<tr>
<td>Total PTE</td>
<td>327.74</td>
<td>327.74</td>
<td>327.74</td>
<td>--</td>
<td>--</td>
<td>397.70</td>
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<td>379.24</td>
<td>376.56</td>
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<table>
<thead>
<tr>
<th>Unit</th>
<th>Potential to Emit after Controls (tons/year)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Line 1, Booth SG3, Gel Coat (LVLP) guns</td>
<td>5.46</td>
</tr>
<tr>
<td>Line 2, Booth SG5, Gel Coat (LVLP) guns</td>
<td>10.92</td>
</tr>
<tr>
<td>New Resin Horizontal Tank (T3)</td>
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<td>Total Controlled of New Units</td>
<td>16.39</td>
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<td>PSD Major Threshold</td>
<td>250</td>
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</table>
### Appendix A: Emissions Calculations

#### Reinforced Plastics and Composites

#### Open Molding Operations After Modification

**Gel Coat Booths SG3 and SG5**

**Company Name:** Patrick Industries, Inc. dba Frontline Manufacturing  
**Source Address:** 1445 Polk Drive, Warsaw, Indiana 46580  
**Prepared By:** D&B Environmental Services, Inc.  
**Significant Source Modification No.:** 085-41958-00077  
**Significant Permit Modification No.:** 085-41960-00077  
**Reviewer:** Wilfredo de la Rosa

---

#### Table: Emissions Calculations

<table>
<thead>
<tr>
<th>Emission Unit ID</th>
<th>Material (Resin or Gel Name)</th>
<th>Density (lb/gal)</th>
<th>Weight % Monomer (as styrene) or Total VOC</th>
<th>Gal of Mat. (gal/unit)²</th>
<th>Maximum usage (units/hour)</th>
<th>UEF (lb monomer/resin or gel coat)</th>
<th>Potential VOC (lb/hr)</th>
<th>Potential VOC (ton/yr)</th>
<th>Transfer Efficiency</th>
<th>Uncontrolled PTE PM (ton/yr)</th>
<th>Particulate Control Efficiency</th>
<th>Controlled PTE PM (ton/yr)</th>
<th>Weight% Cobalt Compounds</th>
<th>Weight% Styrene</th>
<th>Cobalt Compound Emissions (ton/yr)</th>
<th>Styrene Emissions (ton/yr)</th>
<th>Total HAP Emissions (ton/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Line 1 - Gel Coat Application</td>
<td>SG5A (Gun 1)</td>
<td>Gel Coat</td>
<td>10.30</td>
<td>33.23%</td>
<td>0.5373</td>
<td>15</td>
<td>231.76</td>
<td>9.62</td>
<td>42.13</td>
<td>85%</td>
<td>36.42</td>
<td>95%</td>
<td>1.82</td>
<td>0.14%</td>
<td>33.09%</td>
<td>0.30</td>
<td>41.84</td>
</tr>
<tr>
<td></td>
<td>SG5B (Gun 2)</td>
<td>Gel Coat</td>
<td>10.30</td>
<td>33.23%</td>
<td>0.5373</td>
<td>15</td>
<td>231.76</td>
<td>9.62</td>
<td>42.13</td>
<td>85%</td>
<td>36.42</td>
<td>95%</td>
<td>1.82</td>
<td>0.14%</td>
<td>33.09%</td>
<td>0.30</td>
<td>41.84</td>
</tr>
<tr>
<td></td>
<td>SG5C (Gun 3)</td>
<td>Gel Coat</td>
<td>10.30</td>
<td>33.23%</td>
<td>0.5373</td>
<td>15</td>
<td>231.76</td>
<td>9.62</td>
<td>42.13</td>
<td>85%</td>
<td>36.42</td>
<td>95%</td>
<td>1.82</td>
<td>0.14%</td>
<td>33.09%</td>
<td>0.30</td>
<td>41.84</td>
</tr>
<tr>
<td></td>
<td>All Guns Mold Release</td>
<td>7.28</td>
<td>98.00%</td>
<td>0.0125</td>
<td>15</td>
<td>n/a</td>
<td>1.34</td>
<td>5.96</td>
<td>100%</td>
<td>*</td>
<td>*</td>
<td>N/A</td>
<td>-</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00</td>
<td>0.00</td>
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<tr>
<td></td>
<td>All Guns MEK Peroxide</td>
<td>8.34</td>
<td>2.00%</td>
<td>0.0268</td>
<td>15</td>
<td>n/a</td>
<td>0.07</td>
<td>0.29</td>
<td>*</td>
<td>*</td>
<td>*</td>
<td>*</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
</tbody>
</table>

#### Total Potential to Emit:

| Line 1 Total Potential to Emit | 132.55 | 109.25 | 5.46 | 0.89 | 125.51 | 126.40 |

#### Line 2 - Gel Coat Application

<table>
<thead>
<tr>
<th>Emission Unit ID</th>
<th>Material (Resin or Gel Name)</th>
<th>Density (lb/gal)</th>
<th>Weight % Monomer (as styrene) or Total VOC</th>
<th>Gal of Mat. (gal/unit)²</th>
<th>Maximum usage (units/hour)</th>
<th>UEF (lb monomer/resin or gel coat)</th>
<th>Potential VOC (lb/hr)</th>
<th>Potential VOC (ton/yr)</th>
<th>Transfer Efficiency</th>
<th>Uncontrolled PTE PM (ton/yr)</th>
<th>Particulate Control Efficiency</th>
<th>Controlled PTE PM (ton/yr)</th>
<th>Weight% Cobalt Compounds</th>
<th>Weight% Styrene</th>
<th>Cobalt Compound Emissions (ton/yr)</th>
<th>Styrene Emissions (ton/yr)</th>
<th>Total HAP Emissions (ton/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>SG6A (Gun 1)</td>
<td>Gel Coat</td>
<td>10.30</td>
<td>33.23%</td>
<td>0.5373</td>
<td>30</td>
<td>231.76</td>
<td>19.24</td>
<td>84.27</td>
<td>85%</td>
<td>72.83</td>
<td>95%</td>
<td>3.64</td>
<td>0.14%</td>
<td>33.09%</td>
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<td>SG6B (Gun 2)</td>
<td>Gel Coat</td>
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<td>33.23%</td>
<td>0.5373</td>
<td>30</td>
<td>231.76</td>
<td>19.24</td>
<td>84.27</td>
<td>85%</td>
<td>72.83</td>
<td>95%</td>
<td>3.64</td>
<td>0.14%</td>
<td>33.09%</td>
<td>0.59</td>
<td>83.67</td>
</tr>
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<td></td>
<td>SG6C (Gun 3)</td>
<td>Gel Coat</td>
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<td>33.23%</td>
<td>0.5373</td>
<td>30</td>
<td>231.76</td>
<td>19.24</td>
<td>84.27</td>
<td>85%</td>
<td>72.83</td>
<td>95%</td>
<td>3.64</td>
<td>0.14%</td>
<td>33.09%</td>
<td>0.59</td>
<td>83.67</td>
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<tr>
<td></td>
<td>All Guns Mold Release</td>
<td>7.28</td>
<td>98.00%</td>
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<td>n/a</td>
<td>2.68</td>
<td>11.72</td>
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<td>-</td>
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</tr>
<tr>
<td></td>
<td>All Guns MEK Peroxide</td>
<td>8.34</td>
<td>2.00%</td>
<td>0.0268</td>
<td>30</td>
<td>n/a</td>
<td>0.13</td>
<td>0.59</td>
<td>*</td>
<td>*</td>
<td>*</td>
<td>*</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
</tbody>
</table>

#### Total Potential to Emit:

| Line 2 Total Potential to Emit | 265.11 | 218.50 | 10.92 | 1.78 | 251.02 | 252.89 |

| Total Potential to Emit | 397.66 | 327.74 | 16.39 | 2.68 | 378.52 | 379.20 |

---

**PM = PM10 = PM2.5**

*Peroxide contains no solids; only reactive ingredients.**

**METHODOLOGY**

For gel coat, the monomer is styrene.

Use the emission factors based on the type of application from "Unified Emission Factors for Open Molding of Composites," Composites Fabricators Association (10/31/2009) to calculate gel coat emissions.

**UEF:** The United Emission Factor is the emission factor for the resin or gel styrene content determined using the 10/13/2009 UEF Table.

**Potential VOC Emissions per Hour = Density (lb material/gal) x Gal of Material (gal material/unit) x Maximum usage (units/hr) x UEF (lb styrene/ton gelcoat)/2000 lbs material; or wt. % VOC**

**Potential VOC Emissions (lb/hr) = Potential VOC Emissions (lb/hr) x (8,760 hr/yr) x (1 ton/2000 lb)**

**Potential VOC Emissions (ton/yr) = Potential VOC Emissions (ton/yr) x (1 tons/hr) x (24 hr/day) x (365 days/year) x (1 ton/2000 lb)**

**Potential VOC Emissions (tons/yr) = Potential VOC Emissions (tons/yr) x (1 ton/2000 lb)**

**HAP Emissions (ton/yr) = Density (lb material/gal) x Gal of Material (gal material/unit) x Maximum usage (units/hr) x Wt% HAP x (8760 hr/yr) x (1 ton/2000 gal)**

**data from page 14 of the MSDS**

²Provided by the source from the production data

³The source is an existing minor PSD source. The controlled particulate emissions based on the reasonable control of 95% from this source modification is at 16.39 tpy which is well below the PSD major threshold of 250 tpy.

Therefore, per IDEM guidance on reasonable filter control efficiency, a PM/PM10/PM2.5 limit for the gel coat guns does not need to be included in the permit provided the dry filters shall be in operation to control the particulate emissions of the six (6) gel coat guns in SG3 and SG5 at all times the gel coat guns are in operation.
Appendix A: Emission Summary
VOC/HAP Emissions from Polyester Resin Storage Tank T3
PTE of Modification

Company Name: Patrick Industries, Inc. d/b/a Frontline Manufacturing
Source Address: 1445 Polk Drive, Warsaw, Indiana 46580
SSM Number: 085-41958-00077
SPM Number: 085-41960-00077
Reviewer: Wilfredo de la Rosa

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Tank Type</th>
<th>Throughput (gal/year)</th>
<th>Tank Capacity (gal)</th>
<th>Annual Tank Turnovers (N)</th>
<th>VOC/HAP (lb/hr)</th>
<th>VOC/HAP (lb/yr)</th>
<th>VOC/HAP (ton/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Plant 1</td>
<td>Horizontal</td>
<td>1,511,160</td>
<td>5,880</td>
<td>257</td>
<td>0.009</td>
<td>77.70</td>
<td>0.04</td>
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<td></td>
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<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Total VOC/HAP Emissions</strong></td>
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<td></td>
<td></td>
<td>0.009</td>
<td>77.70</td>
<td>0.04</td>
</tr>
</tbody>
</table>

(1) U.S. EPA Tanks 4.0.9d software used to determine breathing and working losses. The material stored is a mixture of unsaturated polyester resin and styrene. As a worst case, tank emissions are based on styrene only. Tanks 4.0.9d inputs for each tank are:
- Shell height =16.50 ft
- Shell diameter =7.58 ft
- Volume = 5,880 gal
- Annual turnovers = 257
- Net throughput = 1,511,160.00 gal/yr
- Unheated tank
- Shell/roof paint = gray/light
- Meterological data = South Bend, IN

Methodology:
VOC Emissions (lb/hr) = [working loss (lb/yr) + breathing loss (lb/yr)]/8,760 hr/yr
VOC Emissions (ton/yr) = [working loss (lb/yr) + breathing loss (lb/yr)]/2,000 lb/ton
### Appendix A: Emission Calculations

#### Natural Gas Combustion - Thermocyclers

<table>
<thead>
<tr>
<th>Company Name:</th>
<th>Patrick Industries, Inc. d/b/a Frontline Manufacturing</th>
</tr>
</thead>
<tbody>
<tr>
<td>Source Address:</td>
<td>1445 Polk Drive, Warsaw, Indiana 46580</td>
</tr>
<tr>
<td>SSM Number:</td>
<td>085-41958-00077</td>
</tr>
<tr>
<td>SPM Number:</td>
<td>085-41960-00077</td>
</tr>
<tr>
<td>Reviewer:</td>
<td>Wilfredo de la Rosa</td>
</tr>
</tbody>
</table>

#### Plant 2

<table>
<thead>
<tr>
<th>Heat Input Capacity (MMBtu/hr)</th>
<th>Potential Throughput (MMCF/yr)</th>
<th>Emission Unit</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.5</td>
<td>12.882</td>
<td>2 units P2TC3-P2TC4 (0.75 MMBtu/hr each)</td>
</tr>
</tbody>
</table>

#### Potential Emissions (tons/yr)

<table>
<thead>
<tr>
<th>Emission Factor in lb/MMCF</th>
<th>PM*</th>
<th>PM10*</th>
<th>PM2.5*</th>
<th>SO2</th>
<th>NOx</th>
<th>VOC</th>
<th>CO</th>
</tr>
</thead>
<tbody>
<tr>
<td>Plant 2 - two (2) Thermocyclers</td>
<td>0.01</td>
<td>0.05</td>
<td>0.05</td>
<td>0.00</td>
<td>0.64</td>
<td>0.04</td>
<td>0.54</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td>0.01</td>
<td>0.05</td>
<td>0.05</td>
<td>0.00</td>
<td>0.64</td>
<td>0.04</td>
<td>0.54</td>
</tr>
</tbody>
</table>

*PM emission factor is filterable PM only. PM10 and PM2.5 emission factors are filterable and condensable particulate combined.**

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32**

#### HAPs - Organics

<table>
<thead>
<tr>
<th>Emission Factor in lb/MMCF</th>
<th>Benzene</th>
<th>Dichlorobenzene</th>
<th>Formaldehyde</th>
<th>Hexane</th>
<th>Toluene</th>
<th>Lead</th>
<th>Cadmium</th>
<th>Chromium</th>
<th>Manganese</th>
<th>Nickel</th>
</tr>
</thead>
<tbody>
<tr>
<td>Plant 2</td>
<td>2.1E-03</td>
<td>1.2E-03</td>
<td>7.5E-02</td>
<td>1.8E+00</td>
<td>3.4E-03</td>
<td>5.0E-04</td>
<td>1.1E-03</td>
<td>1.4E-03</td>
<td>3.8E-04</td>
<td>2.1E-03</td>
</tr>
<tr>
<td>Total</td>
<td>1.4E-05</td>
<td>7.7E-06</td>
<td>4.8E-04</td>
<td>1.2E-02</td>
<td>2.2E-05</td>
<td>3.2E-06</td>
<td>7.1E-06</td>
<td>9.0E-06</td>
<td>2.4E-06</td>
<td>1.4E-05</td>
</tr>
</tbody>
</table>

#### HAPs - Metals

<table>
<thead>
<tr>
<th>Emission Factor in lb/MMCF</th>
<th>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Lead</td>
<td>5.0E-04</td>
</tr>
<tr>
<td>Cadmium</td>
<td>1.1E-03</td>
</tr>
<tr>
<td>Chromium</td>
<td>1.4E-03</td>
</tr>
<tr>
<td>Manganese</td>
<td>3.8E-04</td>
</tr>
<tr>
<td>Nickel</td>
<td>2.1E-03</td>
</tr>
</tbody>
</table>

Emission Factors are from AP-42, Tables 1.4-1 and 1.4-2.

Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**METHODODOLOGY**

Heating Value of Natural Gas is assumed to be 1020 MMBtu/MMCF  
Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) * 8,760 hrs/yr * 1 MMCF/1,020 MMBtu  
Potential Emission (tons/yr) = Throughput (MMCF/yr) * Emission Factor (lb/MMCF) * (1 ton/2,000 lb)
Appendix A: Emission Calculations
Woodworking Operations: Grinding, Sawing and Cutting Operations

Company Name: Patrick Industries, Inc. d/b/a Frontline Manufacturing
Source Address: 1445 Polk Drive, Warsaw, Indiana 46580
SSM Number: 085-41958-00077
SPM Number: 085-41960-00077
Reviewer: Wilfredo de la Rosa

### PLANT 1 - Fiberglas Cutting

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Description</th>
<th>Air Flow (acfm)</th>
<th>Outlet Grain Loading (gr/acf)</th>
<th>Control Efficiency</th>
<th>PTE After Control PM (ton/yr)</th>
<th>PTE Before Control PM (ton/yr)</th>
<th>PTE Before Control PM (lb/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>T1</td>
<td>Plant 1 Trim Booth</td>
<td>2450</td>
<td>0.00164</td>
<td>99.0%</td>
<td>0.15</td>
<td>15.08</td>
<td>3.44</td>
</tr>
<tr>
<td>SR1</td>
<td>Plant 1 Saw Room</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**PM = PM10 = PM2.5**

**0.15** **0.03** **15.08** **3.44**

**METHODOLOGY**

Controlled PTE (ton/yr) = Air Flow (acfm) x Outlet Grain Loading (gr/acf) x (60 min/hr) x (8760 hr/yr) x (1 lb/7000 gr) x (1 ton/2000 lb)

Uncontrolled PTE (ton/yr) = Controlled PTE (ton/yr) / (1 - Control Efficiency)

### PLANT 2

Grinding and Sawing after mod

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Description</th>
<th>Air Flow (acfm)</th>
<th>Outlet Grain Loading (gr/acf)</th>
<th>Control Efficiency</th>
<th>PTE After Control PM (ton/yr)</th>
<th>PTE Before Control PM (ton/yr)</th>
<th>PTE Before Control PM (lb/hr)</th>
<th>326 IAC 6-3-2 limit (lb/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>T2</td>
<td>Trim Booth</td>
<td>2450</td>
<td>0.0016</td>
<td>99.0%</td>
<td>0.15</td>
<td>15.08</td>
<td>0.03</td>
<td>3.44</td>
</tr>
<tr>
<td>SR</td>
<td>Saw Room</td>
<td>10000</td>
<td>0.00064</td>
<td>99.0%</td>
<td>0.24</td>
<td>24.03</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**PM = PM10 = PM2.5**

**0.39** **39.11**

**METHODOLOGY**

Controlled PTE (ton/yr) = Air Flow (acfm) x Outlet Grain Loading (gr/acf) x (60 min/hr) x (8760 hr/yr) x (1 lb/7000 gr) x (1 ton/2000 lb)

Uncontrolled PTE (ton/yr) = Controlled PTE (ton/yr) / (1 - Control Efficiency)
### Appendix A: Emission Calculations

#### Summary of emissions prior to Modification

| Company Name: | Patrick Industries, Inc. dba Frontline Manufacturing |
| Source Address: | 1445 Polk Drive, Warsaw, Indiana 46580 |
| SSM Number: | 086-41968-00077 |
| SPM Number: | 086-41960-00077 |
| Reviewed: | Wilfredo de la Rosa |

#### Potential to Emit before Integral Controls (tons/year)

<table>
<thead>
<tr>
<th>Unit</th>
<th>PM</th>
<th>PM10</th>
<th>PM2.5</th>
<th>SO2</th>
<th>NOx</th>
<th>VOC</th>
<th>CO</th>
<th>Total HAPs</th>
<th>Single HAP (tons)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Line 1</td>
<td>Line 1, gun SOG1A, Resin Application</td>
<td>– – – – – – – – –</td>
<td>120.93</td>
<td>119.74</td>
<td>119.33</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Line 1, gun SOG1B, Resin Application</td>
<td>– – – – – – – – –</td>
<td>32.32</td>
<td>29.93</td>
<td>29.83</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>New Chop Gun SOG1C for Line 1</td>
<td>– – – – – – – – –</td>
<td>30.23</td>
<td>29.93</td>
<td>29.83</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Line 1, Booth SOG, Gel Coat</td>
<td>– – – – – – – – –</td>
<td>97.99</td>
<td>96.35</td>
<td>91.91</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Gel Coat Touch Up Areas P101T1-P101T8</td>
<td>1.29 1.29 1.29 – – –</td>
<td>0.45</td>
<td>0.45</td>
<td>0.45</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Mold Maintenance Area - Release Application</td>
<td>– – – – – – – – –</td>
<td>2.91</td>
<td>0.81</td>
<td>0.81</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Resin Mix Tanks (SM1)</td>
<td>1.49 1.49 1.49 – – –</td>
<td>3.36</td>
<td>3.36</td>
<td>3.36</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Resin Storage Tanks (T1 &amp; T4)</td>
<td>– – – – – – – – –</td>
<td>0.08</td>
<td>0.08</td>
<td>0.08</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Natural Gas Combustion</td>
<td>2.07 2.07 2.07 0.02</td>
<td>3.91 0.21 3.28</td>
<td>0.07</td>
<td>0.07</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Fiberglass Cutting Operations/Woodworking</td>
<td>15.08 15.08 15.08</td>
<td>–</td>
<td>–</td>
<td>–</td>
<td>–</td>
<td>–</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

#### Potential to Emit after Controls (tons/year)

<table>
<thead>
<tr>
<th>Unit</th>
<th>PM</th>
<th>PM10</th>
<th>PM2.5</th>
<th>SO2</th>
<th>NOx</th>
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<th>Total HAPs</th>
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</thead>
<tbody>
<tr>
<td>Line 1</td>
<td>Line 1, gun SOG1A, Resin Application</td>
<td>– – – – – – – – –</td>
<td>120.93</td>
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<td></td>
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<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Gel Coat Touch Up Areas P101T1-P101T8</td>
<td>1.29 1.29 1.29 – – –</td>
<td>0.45</td>
<td>0.45</td>
<td>0.45</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Mold Maintenance Area - Release Application</td>
<td>– – – – – – – – –</td>
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</tr>
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<td></td>
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<td>3.36</td>
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<tr>
<td></td>
<td>Resin Storage Tanks (T1 &amp; T4)</td>
<td>– – – – – – – – –</td>
<td>0.08</td>
<td>0.08</td>
<td>0.08</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Natural Gas Combustion</td>
<td>0.07 0.30 0.30 0.02</td>
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<td>0.07</td>
<td>0.07</td>
<td></td>
<td></td>
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<td></td>
</tr>
<tr>
<td></td>
<td>Fiberglass Cutting Operations/Woodworking</td>
<td>15.08 15.08 15.08</td>
<td>–</td>
<td>–</td>
<td>–</td>
<td>–</td>
<td>–</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

#### Limited Potential to Emit (tons/year)

<table>
<thead>
<tr>
<th>Unit</th>
<th>PM</th>
<th>PM10</th>
<th>PM2.5</th>
<th>SO2</th>
<th>NOx</th>
<th>VOC</th>
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<th>Total HAPs</th>
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</tr>
</thead>
<tbody>
<tr>
<td>Line 1</td>
<td>Line 1, gun SOG1A, Resin Application</td>
<td>– – – – – – – – –</td>
<td>–</td>
<td>–</td>
<td>–</td>
<td>–</td>
<td>–</td>
<td>–</td>
<td>–</td>
</tr>
<tr>
<td></td>
<td>Line 1, gun SOG1B, Resin Application</td>
<td>– – – – – – – – –</td>
<td>–</td>
<td>–</td>
<td>–</td>
<td>–</td>
<td>–</td>
<td>–</td>
<td>–</td>
</tr>
<tr>
<td></td>
<td>New Chop Gun SOG1C for Line 1</td>
<td>– – – – – – – – –</td>
<td>–</td>
<td>–</td>
<td>–</td>
<td>–</td>
<td>–</td>
<td>–</td>
<td>–</td>
</tr>
<tr>
<td></td>
<td>Line 1, Booth SOG, Gel Coat</td>
<td>– – – – – – – – –</td>
<td>–</td>
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<td>–</td>
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<tr>
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<td>–</td>
<td>–</td>
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<td>–</td>
<td>–</td>
<td>–</td>
</tr>
<tr>
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<td>1.49 1.49 1.49 – – –</td>
<td>–</td>
<td>–</td>
<td>–</td>
<td>–</td>
<td>–</td>
<td>–</td>
<td>–</td>
</tr>
<tr>
<td></td>
<td>Resin Storage Tanks (T3 &amp; T4)</td>
<td>– – – – – – – – –</td>
<td>0.08</td>
<td>0.08</td>
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<td></td>
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<td>–</td>
<td>–</td>
<td>–</td>
<td>–</td>
<td></td>
</tr>
</tbody>
</table>

*The limited maintenance emissions associated with the fiberglass production are included in the limited PTE emissions of line 1 and line 2.*

The emissions from cleaners, solvents, and mold release agents are included in the Line 1 and Line 2 emission calculations.
December 12, 2019

Tony Swihart
Patrick Industries Incorporated dba Frontline Manu
PO Box 916
Warsaw, IN  46581

Re: Public Notice
Patrick Industries Incorporated dba Frontline Manufacturing
Permit Level:  Title V Significant Source Mod. (Minor PSD/EO) (120) & Title V Significant Permit Modification
Permit Number: 085-41958-00077 & 085-41960-00077

Dear Tony Swihart:

Enclosed is a copy of your draft Title V Significant Source Mod. (Minor PSD/EO) (120) & Title V Significant Permit Modification, Technical Support Document, emission calculations, and the Public Notice.

The Public Notice period will begin the date the Notice is published on the IDEM Official Public Notice website. Publication has been requested and is expected within 2-3 business days. You may check the exact Public Notice begins and ends date here:  https://www.in.gov/idem/5474.htm

Please note that as of April 17, 2019, IDEM is no longer required to publish the notice in a newspaper.

OAQ has submitted the draft permit package to the Warsaw Community Public Library, 310 E Main St in Warsaw IN 46580-2882. As a reminder, you are obligated by 326 IAC 2-1.1-6(c) to place a copy of the complete permit application at this library no later than ten (10) days after submittal of the application or additional information to our department. We highly recommend that even if you have already placed these materials at the library, that you confirm with the library that these materials are available for review and request that the library keep the materials available for review during the entire permitting process.

Please review the enclosed documents carefully. This is your opportunity to comment on the draft permit and notify the OAQ of any corrections that are needed before the final decision. Questions or comments about the enclosed documents should be directed to Wilfredo de la Rosa, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension 2-8422 or dial (317) 232-8422.

Sincerely,

L. Pogost
Permits Branch
Office of Air Quality

Enclosures
PN Applicant Cover Letter 4/12/19
December 12, 2019

To: Warsaw Community Public Library 310 E Main St Warsaw IN 46580-2882
   (Library)

From: Jenny Acker, Branch Chief
       Permits Branch
       Office of Air Quality

Subject: Important Information to Display Regarding a Public Notice for an Air Permit

   Applicant Name: Patrick Industries Incorporated dba Frontline Manufacturing
   Permit Number: 085-41958-00077 & 085-41960-00077

Enclosed is a copy of important information to make available to the public. This proposed project is regarding a source that may have the potential to significantly impact air quality. Librarians are encouraged to educate the public to make them aware of the availability of this information. The following information is enclosed for public reference at your library:

- Notice of a 30-day Period for Public Comment
- Draft Permit and Technical Support Document

You will not be responsible for collecting any comments from the citizens. Please refer all questions and request for the copies of any pertinent information to the person named below.

Members of your community could be very concerned in how these projects might affect them and their families. Please make this information readily available until you receive a copy of the final package.

If you have any questions concerning this public review process, please contact Joanne Smiddle-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185. Questions pertaining to the permit itself should be directed to the contact listed on the notice.

Enclosures
PN Library updated 4/2019
Notice of Public Comment

December 12, 2019
Patrick Industries Incorporated dba Frontline Manufacturing
085-41958-00077 & 085-41960-00077

Dear Concerned Citizen(s):

You have been identified as someone who could potentially be affected by this proposed air permit. The Indiana Department of Environmental Management, in our ongoing efforts to better communicate with concerned citizens, invites your comment on the draft permit.

Enclosed is a Notice of Public Comment, which has posted on IDEM’s Public Notice website at https://www.in.gov/idem/5474.htm.

The application and supporting documentation for this proposed permit have been placed at the library indicated in the Notice. These documents more fully describe the project, the applicable air pollution control requirements and how the applicant will comply with these requirements.

If you would like to comment on this draft permit, please contact the person named in the enclosed Public Notice. Thank you for your interest in the Indiana’s Air Permitting Program.

Please Note: If you feel you have received this Notice in error, or would like to be removed from the Air Permits mailing list, please contact Patricia Pear with the Air Permits Administration Section at 1-800-451-6027, ext. 3-6875 or via e-mail at PPEAR@IDEM.IN.GOV. If you have recently moved and this Notice has been forwarded to you, please notify us of your new address and if you wish to remain on the mailing list. Mail that is returned to IDEM by the Post Office with a forwarding address in a different county will be removed from our list unless otherwise requested.
AFFECTED STATE NOTIFICATION OF PUBLIC COMMENT PERIOD
DRAFT INDIANA AIR PERMIT

December 12, 2019

A 30-day public comment period has been initiated for:

**Permit Number:** 085-41958-00077 & 085-41960-00077
**Applicant Name:** Patrick Industries Incorporated dba Frontline Manufacturing
**Location:** Warsaw, Kosciusko County, Indiana

The public notice, draft permit and technical support documents can be accessed via the IDEM Air Permits Online site at:
http://www.in.gov/ai/appfiles/idem-caats/

Questions or comments on this draft permit should be directed to the person identified in the public notice by telephone or in writing to:

Indiana Department of Environmental Management
Office of Air Quality, Permits Branch
100 North Senate Avenue
Indianapolis, IN 46204

Questions or comments regarding this email notification or access to this information from the EPA Internet site can be directed to Chris Hammack at chammack@idem.IN.gov or (317) 233-2414.

Affected States Notification 1/9/2017
Name and address of Sender | Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204 | Type of Mail: CERTIFICATE OF MAILING ONLY

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<td>Mr. Kevin Parks D &amp; B Environmental Services, Inc. 401 Lincoln Way West Osceola IN 46561</td>
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<td>Christina Seiler The Rochester Sentinel PO Box 260 Rochester IN 46975</td>
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Mail Code 61-53

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