NOTICE OF 30-DAY PERIOD
FOR PUBLIC COMMENT

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

for Topp Industries, Inc. in Fulton County

Significant Source Modification No.: 049-43425-00018
Significant Permit Modification No.: 049-43448-00018

The Indiana Department of Environmental Management (IDEM) has received an application from Topp Industries, Inc., located at 420 Highway 25 North Rochester, Indiana 46975 and 1235 East 4th Street Rochester, Indiana 46975, for a significant modification of its Part 70 Operating Permit issued on October 27, 2020. If approved by IDEM’s Office of Air Quality (OAQ), this proposed modification would allow Topp Industries, Inc. to make certain changes at its existing source. Topp Industries, Inc. has applied to modify its permit by:

(a) Adding two (2) chop/winding units in the Winding Area.

(b) Adding one (1) powder coating booth to Plant #1.

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 have been sent to:

Fulton County Public Library
320 West 7th Street
Rochester, Indiana 46975

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 application and preliminary findings is also available via IDEM’s Virtual File Cabinet (VFC). To access 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 049-43425-00018 and SPM 049-43448-00018 in all correspondence.

**Comments should be sent to:**

Andrea M. Smith  
IDEM, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
(800) 451-6027, ask for Andrea M. Smith or (317) 234-8339  
Or dial directly: (317) 234-8339  
Fax: (317) 232-6749 attn: Andrea M. Smith  
E-mail: amsmit@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](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](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 and will also be sent to the local library indicated above, IDEM Northern Regional Office, 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 Andrea M. Smith of my staff at the above address.

Iryn Calilung, Section Chief
Permits Branch
Office of Air Quality
Dear Elizabeth Hausmann:

Topp Industries, Inc. was issued Part 70 Operating Permit Renewal No. T049-37849-00018 on June 26, 2017 for a stationary fiberglass reinforced plastics tank and sewer parts manufacturing operation located at 420 Highway 25 North Rochester, Indiana 46975 and 1235 East 4th Street Rochester, Indiana 46975. An application to modify the source was received on October 27, 2020. Pursuant to the provisions of 326 IAC 2-7-10.5, a Significant Source Modification is hereby approved as described in the attached Technical Support Document.

Pursuant to 326 IAC 2-7-10.5, the following emission units are approved for construction at the source:

(a) One (1) chop/winding facility used to make FRP tanks, identified as Application Unit #15, approved in 2020 for construction, consisting of (1) automated non-atomized mechanical resin application unit (flow coater, flow chopper, and/or fluid impingement device), with a maximum capacity of 101.82 pounds of resin per hour, and two (2) steel mandrels, with a maximum mandrel size of twenty-four (24) inches.

Only one (1) mandrel can be sprayed at a time.

This unit is portable.

Each mandrel exhausts to a duct that is using dry filters voluntarily, which exhaust to the winding area vent consisting of stacks V4 to V12.

(b) One (1) chop/winding facility used to make FRP tanks, identified as Application Unit #16, approved in 2020 for construction, consisting of (1) automated non-atomized mechanical resin application unit (flow coater, flow chopper, and/or fluid impingement device), with a maximum capacity of 101.82 pounds of resin per hour, and two (2) steel mandrels, with a maximum mandrel size of twenty-four (24) inches.

Only one (1) mandrel can be sprayed at a time.

This unit is portable.

Each mandrel exhausts to a duct that is using dry filters voluntarily, which exhaust to the winding area vent consisting of stacks V4 to V12.

(c) One (1) powder coating booth, identified as EU-13, approved in 2020 for construction, equipped with an integral powder overspray capture filter bank (CE-3), with a nominal capacity of fourteen and seven hundred thousandths (14.7) pounds of powder per hour, a
nominal product throughput rate of 1,920 lbs/hr of metal parts, and exhausting within the building. EU-13 consists of one (1) powder coating application gun and a conveyor system.

The following construction conditions are applicable to the proposed modification:

**General Construction Conditions**

1. The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).

2. This approval to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

**Effective Date of the Permit**

3. Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.

**Commenced Construction**

4. Pursuant to 326 IAC 2-1.1-9 and 326 IAC 2-7-10.5(j), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

**Approval to Construct**

6. Pursuant to 326 IAC 2-7-10.5(h)(2), this Significant Source Modification authorizes the construction of the new emission unit(s), when the Significant Source Modification has been issued.

Pursuant to 326 IAC 2-7-10.5(m), the emission units constructed under this approval shall not be placed into operation prior to revision of the source’s Part 70 Operating Permit to incorporate the required operation conditions.

Pursuant to 326 IAC 2-7-12, operation of the new emission unit(s) is not approved until the Significant Permit Modification has been issued. Operating conditions shall be incorporated into the Part 70 Operating Permit as a Significant Permit Modification in accordance with 326 IAC 2-7-10.5(m)(2) and 326 IAC 2-7-12 (Permit Modification).

A copy of the permit is available on the Internet at: [http://www.in.gov/ai/appfiles/idem-caats/](http://www.in.gov/ai/appfiles/idem-caats/). A copy of the application and permit is also available via IDEM’s Virtual File Cabinet (VFC). To access VFC, please go to: [http://www.in.gov/idem/](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](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](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.
DRAFT

If you have any questions regarding this matter, please contact Andrea M. Smith, 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) 234-8339 or (800) 451-6027, and ask for Andrea M. Smith or (317) 234-8339.

Sincerely,

Iryn Calilung, Section Chief
Permits Branch
Office of Air Quality

Attachments: Significant Source Modification and Technical Support Document

cc: File - Fulton County
Fulton County Health Department
U.S. EPA, Region 5
Compliance and Enforcement Branch
IDEM Northern Regional Office
OFFICE OF AIR QUALITY

Topp Industries, Inc.
420 Highway 25 North and 1235 East 4th Street
Rochester, Indiana 46975

(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.

Significant Source Modification No.: 049-43425-00018
Master Al ID: 12007

Issued by: Iryn Calilung, Section Chief
Permits Branch
Office of Air Quality

Issuance Date:
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(c) In order to ensure that the powder coating booths EU-09 and EU-13 are exempt from the requirements of 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the respective integral powder overspray capture filter bank for each powder coating booth shall be in operation at all times that each powder coating booth is in operation. ............... 40

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Attachment A: 40 CFR Part 63, Subpart WWWW—National Emission Standards for
Hazardous Air Pollutants for Reinforced Plastic Composites Production
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 reinforced plastics tank and sewer parts manufacturing operation.

Source Address: 420 Highway 25 North and 1235 East 4th Street, Rochester, Indiana 46975
General Source Phone Number: (574) 223-3681
SIC Code: 3089 (Plastic Products, Not Elsewhere Classified)
County Location: Fulton
Source Location Status: Attainment for all criteria pollutants
Source Status: Part 70 Operating Permit Program
Minor Source, under PSD and Emission Offset Rules
Major Source, Section 112 of the Clean Air Act
Not 1 of 28 Source Categories

A.2 Part 70 Source Definition [326 IAC 2-7-1(22)]

This stationary fiberglass reinforced plastics tank and sewer parts manufacturing operation consists of two (2) plants:

(a) Plant 1 is located at 420 Highway 25 North, Rochester, Indiana; and

(b) Plant 2 is located at 1235 East 4th Street, Rochester, Indiana.

These plants are located on adjacent properties, have the same SIC codes and are under common control; therefore they are considered one (1) source, as defined by 326 IAC 2-7-1(22).

This determination was determined in Significant Permit Modification No. 049-33527-00018 issued on January 2, 2014.

A.3 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:

Emission units located at 420 Highway 25 North:

(a) Two (2) hand-held non-atomized mechanical resin application units (flow coaters, flow choppers and/or fluid impingement devices), identified as Application Units #1 and #2, each installed in 2001, each with a maximum capacity of 60.15 pounds of resin per hour.

The units are portable and may be located in one or more of the following:

(1) One (1) open mold application booth used to make fiberglass reinforced plastic (FRP) parts, identified as EU-01, constructed in 1992, using dry filters voluntarily, and exhausting to stack V2.
This booth is located in the resin application area in Plant 1.

(2) One (1) open mold application booth used to make FRP parts, identified as EU-02, constructed in 1992, using dry filters voluntarily, and exhausting to stack V3. This booth is located in the resin application area in Plant 1.

(3) One (1) open mold application booth used to make FRP parts, identified as EU-03, constructed in 1992 and modified in 2013, using dry filters voluntarily, and exhausting to stack V1.

This booth is located in the resin application area in Plant 1 and formerly contained the cutting and grinding (now identified as EU-07) which has been moved to Plant 2.

Under 40 CFR 63, Subpart WWWW, these facilities are an existing open molding process and are part of an existing affected reinforced plastic composites production source.

(b) One (1) winding area, constructed in 1992, modified in 2001, 2004, 2005, 2006, 2007, 2010, 2015, and 2021 identified as EU-04, located in Plant 1, exhausting to stacks V4 to V12 which are shared with EU-11, and consist of the following:

(1) One (1) chop/winding facility used to make FRP tanks, identified as Application Unit #3, constructed in 2001, consisting of one (1) automated non-atomized mechanical resin application unit (flow coater, flow chopper and/or fluid impingement device), with a maximum capacity of 197.11 pounds of resin per hour, and two (2) steel mandrels, with a maximum mandrel size of forty-eight (48) inches.

Only one (1) mandrel can be sprayed at a time.

Each mandrel exhausts to a separate duct that is using dry filters voluntarily, which exhaust to the winding area vent consisting of stacks V4 to V12.

(2) One (1) chop/winding facility used to make FRP tanks, identified as Application Unit #4, constructed in 2001, consisting of one (1) automated non-atomized mechanical resin application units (flow coater, flow chopper and/or fluid impingement device), with a maximum capacity of 272.32 pounds of resin per hour, and two (2) steel mandrels, with a maximum mandrel size of seventy two (72) inches on one and sixty (60) inches on the other.

Only one (1) mandrel can be sprayed at a time.

Each mandrel exhausts to a separate duct that is using dry filters voluntarily, which exhaust to the winding area vent consisting of stacks V4 to V12.
(3) One (1) chop/winding facility used to make FRP tanks, identified as Application Unit #5, constructed in 2004, consisting of one (1) automated non-atomized mechanical resin application units (flow coater, flow chopper and/or fluid impingement device), with a maximum capacity of 175.56 pounds of resin per hour, and two (2) steel mandrels, with a maximum mandrel size of forty (40) inches.

Only one (1) mandrel can be sprayed at a time.

Each mandrel exhausts to a separate duct that is using dry filters voluntarily, which exhaust to the winding area vent consisting of stacks V4 to V12.

(4) One (1) chop/winding facility used to make FRP tanks, identified as Application Unit #6, constructed in 2005, consisting of one (1) automated non-atomized mechanical resin application units (flow coater, flow chopper and/or fluid impingement device), with a maximum capacity of 399.81 pounds of resin per hour, and two (2) steel mandrels, with a maximum mandrel size of ten (10) feet on one and ninety (90) inches on the other.

Only one (1) mandrel can be sprayed at a time.

Each mandrel exhausts to a separate duct that is using dry filters voluntarily, which exhaust to the winding area vent consisting of stacks V4 to V12.

(5) One (1) chop/winding facility used to make FRP tanks, identified as Application Unit #7, constructed in 2006, consisting of one (1) automated non-atomized mechanical resin application units (flow coater, flow chopper and/or fluid impingement device), with a maximum capacity of 111.04 pounds of resin per hour, and two (2) steel mandrels, with a maximum mandrel size of thirty (30) inches.

Only one (1) mandrel can be sprayed at a time.

Each mandrel exhausts to a separate duct that is using dry filters voluntarily, which exhaust to the winding area vent consisting of stacks V4 to V12.

(6) One (1) chop/winding facility used to make FRP tanks, identified as Application Unit #8, constructed in 2007, consisting of one (1) automated non-atomized mechanical resin application units (flow coater, flow chopper and/or fluid impingement device), with a maximum capacity of 166.12 pounds of resin per hour, and two (2) steel mandrels, with a maximum mandrel size of thirty-six (36) inches.

Only one (1) mandrel can be sprayed at a time.

Each mandrel exhausts to a separate duct that is using dry filters voluntarily, which exhaust to the winding area vent consisting of stacks V4 to V12.

(7) One (1) chop/winding facility used to make FRP tanks, identified as Application Unit #9, constructed in 2010, consisting of one (1) automated non-atomized mechanical resin application units (flow coater, flow chopper and/or fluid impingement device), with a maximum capacity of 45.24 pounds of resin per hour, and two (2) steel mandrels, with a maximum mandrel size of eighteen (18) inches.

Only one (1) mandrel can be sprayed at a time.
Each mandrel exhausts to a separate duct that is using dry filters voluntarily, which exhaust to the winding area vent consisting of stacks V4 to V12.

(8) One (1) chop/winding facility used to make FRP tanks, identified as Application Unit #10, constructed in 2010, consisting of one (1) automated non-atomized mechanical resin application units (flow coater, flow chopper and/or fluid impingement device), with a maximum capacity of 101.82 pounds of resin per hour, and two (2) steel mandrels, with a maximum mandrel size of twenty-four (24) inches.

Only one (1) mandrel can be sprayed at a time.

Each mandrel exhausts to a separate duct that is using dry filters voluntarily, which exhaust to the winding area vent consisting of stacks V4 to V12.

(9) One (1) chop/winding facility used to make FRP tanks, identified as Application Unit #13, constructed in 2015, consisting of (1) automated non-atomized mechanical resin application unit (flow coater, flow chopper, and/or fluid impingement device), with a maximum capacity of 101.82 pounds of resin per hour, and two (2) steel mandrels, with a maximum mandrel size of twenty-four (24) inches.

This unit is portable.

Each mandrel exhausts to a duct that is using dry filters voluntarily, which exhaust to the winding area vent consisting of stacks V4 to V12.

(10) One (1) chop/winding facility used to make FRP tanks, identified as Application Unit #14, constructed in 2015, consisting of (1) automated non-atomized mechanical resin application unit (flow coater, flow chopper, and/or fluid impingement device), with a maximum capacity of 101.82 pounds of resin per hour, and two (2) steel mandrels, with a maximum mandrel size of twenty-four (24) inches.

This unit is portable.

Each mandrel exhausts to a duct that is using dry filters voluntarily, which exhaust to the winding area vent consisting of stacks V4 to V12.

(11) One (1) chop/winding facility used to make FRP tanks, identified as Application Unit #15, approved in 2021 for construction, consisting of (1) automated non-atomized mechanical resin application unit (flow coater, flow chopper, and/or fluid impingement device), with a maximum capacity of 101.82 pounds of resin per hour, and two (2) steel mandrels, with a maximum mandrel size of twenty-four (24) inches.

This unit is portable.

Each mandrel exhausts to a duct that is using dry filters voluntarily, which
exhaust to the winding area vent consisting of stacks V4 to V12.

(12) One (1) chop/winding facility used to make FRP tanks, identified as Application Unit #16, approved in 2021 for construction, consisting of (1) automated non-atomized mechanical resin application unit (flow coater, flow chopper, and/or fluid impingement device), with a maximum capacity of 101.82 pounds of resin per hour, and two (2) steel mandrels, with a maximum mandrel size of twenty-four (24) inches.

Only one (1) mandrel can be sprayed at a time.

This unit is portable.

Each mandrel exhausts to a duct that is using dry filters voluntarily, which exhaust to the winding area vent consisting of stacks V4 to V12.

Under 40 CFR 63, Subpart WWWW, these facilities are an existing open molding process and are part of an existing affected reinforced plastic composites production source.

(c) Gel Coat Applications:

(1) One (1) gel coat application, identified as EU-11, constructed in 2016, using one (1) atomized spray applicator, with a maximum capacity of 20 pounds of gel coat to cover one (1) tank per hour, located in the winding area of Plant 1, using dry filters voluntarily, which exhaust to the winding area vent consisting of stacks V4 to V12 shared with application units #3-#10, #13, and #14.

Under 40 CFR 63, Subpart WWWW, the above facility is an existing open molding process and is part of an existing affected reinforced plastic composites production source.

(2) One (1) touch up/production gel coat application operation, identified as EU-12, constructed in 2016, using a roll-on applicator, with a maximum throughput of 0.60 pounds of gel coat per hour, using no control, exhausting indoors.

Under 40 CFR 63, Subpart WWWW, the above facility is an existing open molding process and is part of an existing affected reinforced plastic composites production source.

(d) One (1) compression molding process, identified as EU-08, consisting of the following:

(1) One (1) compression molding process, identified as CMP-1, constructed in 2015, using styrene-based sheet molding compound or bulk molding compound, with a maximum capacity of 356.2 pounds of sheet molding compound or bulk molding compound per hour, exhausting to general ventilation, with no control.

(2) One (1) compression molding process, identified as CMP-2, constructed in 2015, using styrene-based sheet molding compound or bulk molding compound, with a maximum capacity of 356.2 pounds of sheet molding compound or bulk molding compound per hour, exhausting to general ventilation, with no control.

(3) One (1) compression molding process, identified as CMP-3, constructed in 2015, using styrene-based sheet molding compound or bulk molding compound, with a maximum capacity of 102 pounds of sheet molding compound or bulk molding compound per hour, exhausting to general ventilation, with no control.
(4) One (1) compression molding process, identified as CMP-4, constructed in 2015, using styrene-based sheet molding compound or bulk molding compound, with a maximum capacity of 48 pounds of sheet molding compound or bulk molding compound per hour, exhausting to general ventilation, with no control.

(5) One (1) compression molding process, identified as CMP-5, constructed in 2015, using styrene-based sheet molding compound or bulk molding compound, with a maximum capacity of 102 pounds of sheet molding compound or bulk molding compound per hour, exhausting to general ventilation, with no control.

(6) One (1) compression molding process, identified as CMP-6, constructed in 2015, using styrene-based sheet molding compound or bulk molding compound, with a maximum capacity of 102 pounds of sheet molding compound or bulk molding compound per hour, exhausting to general ventilation, with no control.

Under 40 CFR 63, Subpart WWWW, these facilities are an existing closed molding process and are part of an existing affected reinforced plastic composites production source.

(e) One (1) natural gas combustion units, constructed in 2006, with a combined maximum heat input capacity of 9.90 MMBtu per hour, no control, and exhausting outside.

(f) One (1) natural gas-fired comfort heating unit, constructed in 2015, with a maximum heat input capacity of 3.3 MMBtu per hour, no control, and exhausting outside.

(g) One (1) welding and cutting department consisting of the following equipment:

(1) Two (2) plasma cutting tables, constructed in 2015, each with a capacity of 90 inches of 0.25 inch steel per minute, and exhausting indoors.

(2) One (1) laser steel cutting table, constructed in 2015, with a capacity of 90 inches of 0.25 inch steel per minute, and exhausting indoors.

(3) One (1) oxyacetylene cutting station, constructed in 2015, with a capacity of 5 inches of 0.25 inch steel per minute, and exhausting indoors.

(4) Six (6) MIG welders, constructed in 2015, with a capacity of 0.5 pounds of welding wire per hour each, and exhausting indoors.

(5) One (1) oxyacetylene welding unit, constructed in 2015, with a capacity of 0.5 pounds of welding wire per hour, and exhausting indoors.

(h) Two (2) powder coating booths:

(1) One (1) powder coating booth, identified as EU-09, constructed in 2015, equipped with an integral powder overspray capture filter bank, with a capacity of 14.7 pounds of powder per hour, a product throughput rate of 1,920 pounds of metal parts per hour, and exhausting inside the building. EU-09 consists of one (1) powder coating application gun and a conveyor system.

(2) One (1) powder coating booth, identified as EU-13, approved in 2021 for construction, equipped with an integral powder overspray capture filter bank (CE-3), with a nominal capacity of fourteen and seven hundred thousandths (14.7) pounds of powder per hour, a nominal product throughput rate of 1,920 lbs/hr of metal parts, and exhausting within the building. EU-13 consists of one (1)
powder coating application gun and a conveyor system.

(i) One (1) manual cutting/grinding booth, identified as EU-10, constructed in 2015, consisting of two (2) grinders, identified as SG-01 and SG-02, respectively, with total throughput rate 435 pounds of fiberglass reinforced plastic per hour, using dry filters as control and exhausting to stack V3.

Emission units located at 1235 East 4th Street:

(j) Two (2) hand-held non-atomized mechanical resin application units (flow coaters, flow choppers and/or fluid impingement devices), identified as Application Units #11 and #12, each constructed in 2013, each with a maximum capacity of 60.15 pounds of resin per hour.

The units are portable and may be located in one or more of the following:

(1) One (1) open mold application booth used to make fiberglass reinforced plastic (FRP) parts, identified as EU-05, constructed in 2013, using dry filters voluntarily, and exhausting to stacks V101 through V107.

This booth is located in the resin application area of Plant 2.

(2) One (1) open mold application booth used to make fiberglass reinforced plastic (FRP) parts, identified as EU-06, constructed in 2013, using dry filters voluntarily, and exhausting to stacks V101 through V107.

This booth is located in the resin application area of Plant 2.

Under 40 CFR 63, Subpart WWWW, these facilities are an existing open molding process and are part of an existing affected reinforced plastic composites production source.

(k) One (1) cutting and grinding booth, identified as EU-07, constructed in 2013, consisting of a large and small grinder, maximum process weight rate of 0.435 tons/hr, trimming a maximum of 10.8 FRP tanks per hour, equipped with dry filters for particulate control, and exhausting through stacks V108 through V113.

(l) One (1) natural gas-fired comfort heating unit, constructed in 2013, with a maximum heat input capacity of 3.37 MMBtu per hour, no control, and exhausting outside.

A.4 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):

Insignificant activities located at 1235 East 4th Street:

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

Insignificant activities common to both plants:

(b) Paved and unpaved roads and parking lots with public access.

(c) One (1) plumbing department identified as IA-1, applying PVC glues on plastic parts, with maximum capacity of 0.0014 gallon per part and 1.0 part per hour (less than 100 gallons
of coating per year), using no control, and exhausting inside the building.

(d) Application of oils, greases, lubricants or other nonvolatile material applied as temporary protective coatings

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, T049-37849-00018, 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.
The submittal 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.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 description of the emergency;
     - Any steps taken to mitigate the emissions; and
     - Corrective actions taken.
(6) The Permittee immediately took all reasonable steps to correct the emergency.

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

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

(e) 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.

(f) 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.

(g) 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.

B.12 Permit Shield [326 IAC 2-7-15][326 IAC 2-7-20][326 IAC 2-7-12]

(a) 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.

(b) 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 T049-37849-00018 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)][326 IAC 2-7-8(a)][326 IAC 2-7-9]

(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][326 IAC 2-7-4][326 IAC 2-7-8(e)]

(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 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) 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
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

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 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.7 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:
   A. Asbestos removal or demolition start date;
   B. Removal or demolition contractor; or
   C. 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(c).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(d).

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.

(f) 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).

(g) 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.8 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.9 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.10 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:
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.11 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.12 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.13 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.14 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.15 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.16 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:

(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:
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.17 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:

- (AA) All calibration and maintenance records.
- (BB) All original strip chart recordings for continuous monitoring instrumentation.
- (CC) Copies of all reports required by the Part 70 permit.

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

- (AA) The date, place, as defined in this permit, and time of sampling or measurements.
- (BB) The dates analyses were performed.
- (CC) The company or entity that performed the analyses.
- (DD) The analytical techniques or methods used.
- (EE) The results of such analyses.
- (FF) 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.18 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.19 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.
Emissions Unit Description:

Emission units located at 420 Highway 25 North:

(a) Two (2) hand-held non-atomized mechanical resin application units (flow coaters, flow choppers and/or fluid impingement devices), identified as Application Units #1 and #2, each installed in 2001, each with a maximum capacity of 60.15 pounds of resin per hour.

The units are portable and may be located in one or more of the following:

(1) One (1) open mold application booth used to make fiberglass reinforced plastic (FRP) parts, identified as EU-01, constructed in 1992, using dry filters voluntarily, and exhausting to stack V2.

This booth is located in the resin application area in Plant 1.

(2) One (1) open mold application booth used to make FRP parts, identified as EU-02, constructed in 1992, using dry filters voluntarily, and exhausting to stack V3.

This booth is located in the resin application area in Plant 1.

(3) One (1) open mold application booth used to make FRP parts, identified as EU-03, constructed in 1992 and modified in 2013, using dry filters voluntarily, and exhausting to stack V1.

This booth is located in the resin application area in Plant 1 and formerly contained the cutting and grinding (now identified as EU-07) which has been moved to Plant 2.

Under 40 CFR 63, Subpart WWWW, these facilities are an existing open molding process and are part of an existing affected reinforced plastic composites production source.

(b) One (1) winding area, constructed in 1992, modified in 2001, 2004, 2005, 2006, 2007, 2010, 2015, and 2021 identified as EU-04, located in Plant 1, exhausting to stacks V4 to V12 which are shared with EU-11, and consist of the following:

(1) One (1) chop/winding facility used to make FRP tanks, identified as Application Unit #3, constructed in 2001, consisting of one (1) automated non-atomized mechanical resin application unit (flow coater, flow chopper and/or fluid impingement device), with a maximum capacity of 197.11 pounds of resin per hour, and two (2) steel mandrels, with a maximum mandrel size of forty-eight (48) inches.

Only one (1) mandrel can be sprayed at a time.

Each mandrel exhausts to a separate duct that is using dry filters voluntarily, which exhaust to the winding area vent consisting of stacks V4 to V12.

(2) One (1) chop/winding facility used to make FRP tanks, identified as Application Unit #4, constructed in 2001, consisting of one (1) automated non-atomized mechanical resin application units (flow coater, flow chopper and/or
fluid impingement device), with a maximum capacity of 272.32 pounds of resin per hour, and two (2) steel mandrels, with a maximum mandrel size of seventy two (72) inches on one and sixty (60) inches on the other.

Only one (1) mandrel can be sprayed at a time.

Each mandrel exhausts to a separate duct that is using dry filters voluntarily, which exhaust to the winding area vent consisting of stacks V4 to V12.

(3) One (1) chop/winding facility used to make FRP tanks, identified as Application Unit #5, constructed in 2004, consisting of one (1) automated non-atomized mechanical resin application units (flow coater, flow chopper and/or fluid impingement device), with a maximum capacity of 175.56 pounds of resin per hour, and two (2) steel mandrels, with a maximum mandrel size of forty (40) inches.

Only one (1) mandrel can be sprayed at a time.

Each mandrel exhausts to a separate duct that is using dry filters voluntarily, which exhaust to the winding area vent consisting of stacks V4 to V12.

(4) One (1) chop/winding facility used to make FRP tanks, identified as Application Unit #6, constructed in 2005, consisting of one (1) automated non-atomized mechanical resin application units (flow coater, flow chopper and/or fluid impingement device), with a maximum capacity of 399.81 pounds of resin per hour, and two (2) steel mandrels, with a maximum mandrel size of ten (10) feet on one and ninety (90) inches on the other.

Only one (1) mandrel can be sprayed at a time.

Each mandrel exhausts to a separate duct that is using dry filters voluntarily, which exhaust to the winding area vent consisting of stacks V4 to V12.

(5) One (1) chop/winding facility used to make FRP tanks, identified as Application Unit #7, constructed in 2006, consisting of one (1) automated non-atomized mechanical resin application units (flow coater, flow chopper and/or fluid impingement device), with a maximum capacity of 111.04 pounds of resin per hour, and two (2) steel mandrels, with a maximum mandrel size of thirty (30) inches.

Only one (1) mandrel can be sprayed at a time.

Each mandrel exhausts to a separate duct that is using dry filters voluntarily, which exhaust to the winding area vent consisting of stacks V4 to V12.

(6) One (1) chop/winding facility used to make FRP tanks, identified as Application Unit #8, constructed in 2007, consisting of one (1) automated non-atomized mechanical resin application units (flow coater, flow chopper and/or fluid impingement device), with a maximum capacity of 166.12 pounds of resin per hour, and two (2) steel mandrels, with a maximum mandrel size of thirty-six (36) inches.

Only one (1) mandrel can be sprayed at a time.

Each mandrel exhausts to a separate duct that is using dry filters voluntarily, which exhaust to the winding area vent consisting of stacks V4 to V12.
(7) One (1) chop/winding facility used to make FRP tanks, identified as Application Unit #9, constructed in 2010, consisting of one (1) automated non-atomized mechanical resin application units (flow coater, flow chopper and/or fluid impingement device), with a maximum capacity of 45.24 pounds of resin per hour, and two (2) steel mandrels, with a maximum mandrel size of eighteen (18) inches.

Only one (1) mandrel can be sprayed at a time.

Each mandrel exhausts to a separate duct that is using dry filters voluntarily, which exhaust to the winding area vent consisting of stacks V4 to V12.

(8) One (1) chop/winding facility used to make FRP tanks, identified as Application Unit #10, constructed in 2010, consisting of one (1) automated non-atomized mechanical resin application units (flow coater, flow chopper and/or fluid impingement device), with a maximum capacity of 101.82 pounds of resin per hour, and two (2) steel mandrels, with a maximum mandrel size of twenty-four (24) inches.

Only one (1) mandrel can be sprayed at a time.

Each mandrel exhausts to a separate duct that is using dry filters voluntarily, which exhaust to the winding area vent consisting of stacks V4 to V12.

(9) One (1) chop/winding facility used to make FRP tanks, identified as Application Unit #13, constructed in 2015, consisting of (1) automated non-atomized mechanical resin application unit (flow coater, flow chopper, and/or fluid impingement device), with a maximum capacity of 101.82 pounds of resin per hour, and two (2) steel mandrels, with a maximum mandrel size of twenty-four (24) inches.

Only one (1) mandrel can be sprayed at a time.

This unit is portable.

Each mandrel exhausts to a duct that is using dry filters voluntarily, which exhaust to the winding area vent consisting of stacks V4 to V12.

(10) One (1) chop/winding facility used to make FRP tanks, identified as Application Unit #14, constructed in 2015, consisting of (1) automated non-atomized mechanical resin application unit (flow coater, flow chopper, and/or fluid impingement device), with a maximum capacity of 101.82 pounds of resin per hour, and two (2) steel mandrels, with a maximum mandrel size of twenty-four (24) inches.

Only one (1) mandrel can be sprayed at a time.

This unit is portable.

Each mandrel exhausts to a duct that is using dry filters voluntarily, which exhaust to the winding area vent consisting of stacks V4 to V12.

(11) One (1) chop/winding facility used to make FRP tanks, identified as Application Unit #15, approved in 2021 for construction, consisting of (1) automated non-atomized mechanical resin application unit (flow coater, flow
chopper, and/or fluid impingement device), with a maximum capacity of 101.82 pounds of resin per hour, and two (2) steel mandrels, with a maximum mandrel size of twenty-four (24) inches.

Only one (1) mandrel can be sprayed at a time.

This unit is portable.

Each mandrel exhausts to a duct that is using dry filters voluntarily, which exhaust to the winding area vent consisting of stacks V4 to V12.

(12) One (1) chop/winding facility used to make FRP tanks, identified as Application Unit #16, approved in 2021 for construction, consisting of (1) automated non-atomized mechanical resin application unit (flow coater, flow chopper, and/or fluid impingement device), with a maximum capacity of 101.82 pounds of resin per hour, and two (2) steel mandrels, with a maximum mandrel size of twenty-four (24) inches.

Only one (1) mandrel can be sprayed at a time.

This unit is portable.

Each mandrel exhausts to a duct that is using dry filters voluntarily, which exhaust to the winding area vent consisting of stacks V4 to V12.

Under 40 CFR 63, Subpart WWWW, these facilities are an existing open molding process and are part of an existing affected reinforced plastic composites production source.

(c) Gel Coat Applications:

(1) One (1) gel coat application, identified as EU-11, constructed in 2016, using one (1) atomized spray applicator, with a maximum capacity of 20 pounds of gel coat to cover one (1) tank per hour, located in the winding area of Plant 1, using dry filters voluntarily, which exhaust to the winding area vent consisting of stacks V4 to V12 shared with application units #3-#10, #13, and #14.

Under 40 CFR 63, Subpart WWWW, the above facility is an existing open molding process and is part of an existing affected reinforced plastic composites production source.

(2) One (1) touch up/production gel coat application operation, identified as EU-12, constructed in 2016, using a roll-on applicator, with a maximum throughput of 0.60 pounds of gel coat per hour, using no control, exhausting indoors.

Under 40 CFR 63, Subpart WWWW, the above facility is an existing open molding process and is part of an existing affected reinforced plastic composites production source.

(d) One (1) compression molding process, identified as EU-08, consisting of the following:

(1) One (1) compression molding process, identified as CMP-1, constructed in 2015, using styrene-based sheet molding compound or bulk molding compound, with a maximum capacity of 356.2 pounds of sheet molding compound or bulk molding compound per hour, exhausting to general ventilation, with no control.
(2) One (1) compression molding process, identified as CMP-2, constructed in 2015, using styrene-based sheet molding compound or bulk molding compound, with a maximum capacity of 356.2 pounds of sheet molding compound or bulk molding compound per hour, exhausting to general ventilation, with no control.

(3) One (1) compression molding process, identified as CMP-3, constructed in 2015, using styrene-based sheet molding compound or bulk molding compound, with a maximum capacity of 102 pounds of sheet molding compound or bulk molding compound per hour, exhausting to general ventilation, with no control.

(4) One (1) compression molding process, identified as CMP-4, constructed in 2015, using styrene-based sheet molding compound or bulk molding compound, with a maximum capacity of 48 pounds of sheet molding compound or bulk molding compound per hour, exhausting to general ventilation, with no control.

(5) One (1) compression molding process, identified as CMP-5, constructed in 2015, using styrene-based sheet molding compound or bulk molding compound, with a maximum capacity of 102 pounds of sheet molding compound or bulk molding compound per hour, exhausting to general ventilation, with no control.

(6) One (1) compression molding process, identified as CMP-6, constructed in 2015, using styrene-based sheet molding compound or bulk molding compound, with a maximum capacity of 102 pounds of sheet molding compound or bulk molding compound per hour, exhausting to general ventilation, with no control.

Under 40 CFR 63, Subpart WWWWW, these facilities are an existing closed molding process and are part of an existing affected reinforced plastic composites production source.

(h) Two (2) powder coating booths:

(1) One (1) powder coating booth, identified as EU-09, constructed in 2015, equipped with an integral powder overspray capture filter bank, with a capacity of 14.7 pounds of powder per hour, a product throughput rate of 1,920 pounds of metal parts per hour, and exhausting inside the building. EU-09 consists of one (1) powder coating application gun and a conveyor system.

(2) One (1) powder coating booth, identified as EU-13, approved in 2021 for construction, equipped with an integral powder overspray capture filter bank (CE-3), with a nominal capacity of fourteen and seven hundred thousandths (14.7) pounds of powder per hour, a nominal product throughput rate of 1,920 lbs/hr of metal parts, and exhausting within the building. EU-13 consists of one (1) powder coating application gun and a conveyor system.

(i) One (1) manual cutting/grinding booth, identified as EU-10, constructed in 2015, consisting of two (2) grinders, identified as SG-01 and SG-02, respectively, with total throughput rate 435 pounds of fiberglass reinforced plastic per hour, using dry filters as control and exhausting to stack V3.
Emission units located at 1235 East 4th Street:

(j) Two (2) hand-held non-atomized mechanical resin application units (flow coaters, flow choppers and/or fluid impingement devices), identified as Application Units #11 and #12, each constructed in 2013, each with a maximum capacity of 60.15 pounds of resin per hour.

The units are portable and may be located in one or more of the following:

(1) One (1) open mold application booth used to make fiberglass reinforced plastic (FRP) parts, identified as EU-05, constructed in 2013, using dry filters voluntarily, and exhausting to stacks V101 through V107. This booth is located in the resin application area of Plant 2.

(2) One (1) open mold application booth used to make fiberglass reinforced plastic (FRP) parts, identified as EU-06, constructed in 2013, using dry filters voluntarily, and exhausting to stacks V101 through V107. This booth is located in the resin application area of Plant 2.

Under 40 CFR 63, Subpart WWWW, these facilities are an existing open molding process and are part of an existing affected reinforced plastic composites production source.

(k) One (1) cutting and grinding booth, identified as EU-07, constructed in 2013, consisting of a large and small grinder, maximum process weight rate of 0.435 tons/hr, trimming a maximum of 10.8 FRP tanks per hour, equipped with dry filters for particulate control, and exhausting through stacks V108 through V113.

(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 Prevention of Significant Deterioration (PSD) [326 IAC 2-2]

Pursuant to Significant Permit Modification No. 049-37453-00018, issued on October 6, 2016 and approved in 2021 for modification, in order to render the requirements of 326 IAC 2-2 (PSD) not applicable, the total VOC emissions from the use of resins, catalysts, gel coats, and clean-up solvents by the following application resin and gel coats units:

Emission units located at 420 Highway 25 North:

(a) Application Unit #1
(b) Application Unit #2
(c) Application Unit #3
(d) Application Unit #4
(e) Application Unit #5
(f) Application Unit #6
(g) Application Unit #7
(h) Application Unit #8
(i) Application Unit #9
(j) Application Unit #10
(k) Application Unit #13
(l) Application Unit #14
(n) Application Unit #15
(o) Application Unit #16
(p) Touch up/production gel coat application operation, EU-12

Emission units located at 1235 East 4th Street:
(q) Application Unit#11
(r) Application Unit#12
(s) Mold release agents

shall not exceed ninety-nine (99) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with these limits, combined with the unlimited potential to emit VOC from all other emission units at this source, shall limit the source-wide total potential to emit of VOC to less than 250 tons per 12 consecutive month period and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6, VOC emissions from the resin application units, identified as Application Units #1 through #6, shall be reduced using best available control technology (BACT).

Pursuant to the BACT determination under 326 IAC 8-1-6 in Part 70 Operating Permit No. T049-9015-00018, issued on May 31, 2001, operating conditions for the FRP tank and parts production process including the resin application units, identified as Application Units #1 through #6, shall be the following:

(a) Use of resins and clean-up solvents, as well as VOC delivered to the applicators shall be limited such that the potential to emit (PTE) VOC from resin applications shall be limited to ninety-nine (99) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

(b) Resins used, including filled resins and tooling resins, shall be limited to maximum monomer contents of 35 percent (35%) by weight for resins or their equivalent on an emissions mass basis. If all of the resins used during a month meet the monomer content without exceeding the values specified, then maintaining records as specified in the permit is sufficient for demonstrating compliance. Monomer contents shall be calculated on a neat basis, i.e., excluding any filler. If non-compliant resins are used, then compliance shall be demonstrated on a monthly basis by calculating the monomer content on a neat basis.

The use of resins with monomer contents lower than thirty-five percent (35%), and/or additional emission reduction techniques approved by IDEM, OAQ, may be used to offset the use of resins with monomer contents higher than thirty-five percent (35%). Examples of other techniques include, but are not limited to, lower monomer content resins, closed molding, vapor suppression, vacuum bagging, controlled spraying, or installing a control device with an overall reduction efficiency of ninety-five percent (95%). This is allowed to meet the monomer content limits for resins, and shall be calculated on an equivalent emissions mass basis as shown below:

\[(\text{Emissions from } >35\% \text{ resin}) - (\text{Emissions from } 35\% \text{ resin}) \leq (\text{Emissions from } 35\% \text{ resin}) - (\text{Emissions from } <35\% \text{ resin, and or other emission reduction techniques})\]

Where: \(\text{Emissions, lb or ton} = M \text{ (mass of resin, lb or ton)} \times EF \text{ (Monomer emission factor for resin %)}\):

\(EF, \text{ Monomer emission factor} = \text{emission factor, expressed as } \% \text{ styrene emitted per weight of resin applied, which is indicated by the monomer content, method of application, and other emission reduction techniques}\)
for each resin used.

(c) Non-atomized spray application technology shall be used to apply unfilled production resins. Non-atomized spray application technology includes flow coaters, flow choppers, impingement guns, pressure-feed rollers, or other non-spray applications of a design and specifications approved by IDEM, OAQ.

If, after one (1) year of operation it is not possible to apply a portion of neat resins with flow coaters or impingement guns, equivalent emissions reductions must be obtained via use of other techniques, such as those listed in paragraph (b) above, elsewhere in the process.

(d) Optimized spray techniques according to a manner approved by IDEM shall be used for filled resins (where fillers are required for corrosion or fire retardant purposes) at all times. Optimized spray techniques include, but are not limited to, the use of airless, air-assisted airless, high volume low pressure (HVLP), or other spray applicators demonstrated to the satisfaction of IDEM, OAQ, to be equivalent to the spray applicators listed above.

HVLP spray is the technology used to apply material to substrate by means of coating application equipment that operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

(e) The listed work practices shall be followed:

(1) To the extent possible, a non-VOC, non-HAP solvent shall be used for cleanup.

(2) Cleanup solvent containers used to transport solvent from drums to work stations shall be closed containers having soft gasketed spring-loaded closures.

(3) Cleanup rags saturated with solvent shall be stored, transported, and disposed of in containers that are closed tightly.

(4) The spray guns used shall be the type that can be cleaned without the need for spraying the solvent into the air.

(5) All solvent sprayed during cleanup or resin changes shall be directed into containers, such containers shall be closed as soon as solvent spraying is complete and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

(6) Storage containers used to store VOC- and/or HAP- containing materials shall be kept covered when not in use.

D.1.3 Reinforced Plastics Composites Production [326 IAC 20-56-2]

Pursuant to 326 IAC 20-56-2, the Permittee shall comply with the following requirements:

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

(1) All personnel hired shall be trained within (30) days of hiring.
(2) To ensure training goals listed in subsection (b) are maintained, all personnel shall be given refresher training annually.

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

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

(1) Appropriate application techniques.

(2) Appropriate equipment cleaning procedures.

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

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

(1) A copy of the current training program.

(2) A list of the following:

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

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

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

D.1.4 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]

(a) Pursuant to 326 IAC 6-3-2(e), the allowable particulate emissions rate from the one (1) cutting and grinding booth, identified as EU-10, shall not exceed 1.48 pounds per hour when operating at a process weight rate of 0.22 tons per hour.

(b) Pursuant to 326 IAC 6-3-2(e), the allowable particulate emissions rate from the one (1) cutting and grinding booth, identified as EU-07, shall not exceed 2.35 pounds per hour when operating at a process weight rate of 0.435 tons per hour.

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

A Preventive Maintenance Plan is required for these facilities and the associated 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.1.6 Volatile Organic Compounds (VOCs)

(a) Compliance with the VOC content and usage limitations contained in Conditions D.1.1
and D.1.2 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) VOC emissions from resins shall be calculated by multiplying the usage of each resin by the emission factor provided by the “Unified Emission Factors for Open Molding of Composites,” American Composites Manufacturers Association (ACMA), October 13, 2009 or its updates. VOC emissions from all other operations shall be calculated by multiplying the usage of each VOC containing solvent and coating by the VOC content of the material.

D.1.7 Volatile Organic Compounds (VOCs)

Compliance with the limits in Conditions D.1.1, D.1.2(a), and D.1.2(b), shall be determined based upon the following criteria:

(a) Monthly usage by weight, content of monomer that is HAP, method of application, and other emission reduction techniques used for each resin shall be recorded.

Volatile organic HAP emissions shall be calculated by multiplying the usage of each resin by the emission factor that is appropriate for the HAP monomer content, method of application, and other emission reduction techniques used for each resin, and summing the emissions for all resins.

Emission factors shall be obtained from the reference approved by IDEM, OAQ.

(b) The emission factors approved for use by IDEM, OAQ shall be taken from the following reference: “Unified Emission Factors for Open Molding of Composites,” American Composites Manufacturers Association (ACMA), October 13, 2009 or its updates, with the exception of the emission factors for controlled spray application. This reference is included with this permit.

For HAP-emitting operations not addressed by this reference, emission factors shall be taken from U.S. EPA's AP-42 document.

For the purposes of these emission calculations, HAP monomer in resins that is not styrene or methyl methacrylate shall be considered as styrene on an equivalent weight basis.

D.1.8 Particulate Control [326 IAC 2-7-6(6)]

(a) In order to comply with Condition D.1.4(a), the dry filters for particulate control shall be in operation and control emissions from the cutting/grinding operation EU-10 at all times that cutting/grinding operation EU-10 is in operation.

(b) In order to comply with Condition D.1.4(b), the dry filters for particulate control shall be in operation and control emissions from the cutting and grinding operation EU-07 at all times that cutting and grinding operation EU-07 is in operation.

(c) In order to ensure that the powder coating booths EU-09 and EU-13 are exempt from the requirements of 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the respective integral powder overspray capture filter bank for each powder
coating booth shall be in operation at all times that each powder coating booth is in operation.

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

D.1.9 Visible Emissions Notations

(a) Daily visible emission notations of the cutting and grinding booth stack exhausts (stacks V108 through V113 and stack V3) shall be performed 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 required by this condition. Failure to take a reasonable response shall be considered a deviation from this permit.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(1)][326 IAC 2-7-19]

D.1.10 Record Keeping Requirements

(a) To document the compliance status with Conditions D.1.1 and D.1.2, the Permittee shall maintain the following records in accordance with (1) and (2) below.

(1) Monthly usage by weight, monomer content, method of application, and other emission reduction techniques for each resin shall be recorded.

VOC emissions shall be calculated by multiplying the usage of each resin by the emission factor that is appropriate for the monomer content, method of application, and other emission reduction techniques for each resin, and summing the emissions for all resins.

Emission factors shall be obtained from the reference approved by IDEM, OAQ.

(2) 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", American Composites Manufacturers Association (ACMA), October 13, 2009 or its updates.

For operations not addressed by this reference, emission factors shall be taken from U.S. EPA's AP-42 document.

For the purposes of these emission calculations, monomer in resins that is not styrene or methyl methacrylate shall be considered as styrene on an equivalent weight basis.
(b) To document the compliance status with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAP monomer content limits. Records necessary to demonstrate compliance shall be available not later than thirty (30) days of the end of each compliance period.

Examples of such records include but are not limited to:

1. The amount and VOC content of each material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS), manufacturer's certified product data sheets, and calculations necessary to verify the type, amount used, and HAP content of each resin;
2. A log of the dates of use;
3. Method of application and other emission reduction techniques for each resin used;
4. Monthly calculations demonstrating compliance on an equivalent emissions mass basis if non-compliant resins are used during that month;
5. The average styrene concentration in the resin used, if non-compliant resins are used during that month.

(c) To document the compliance status with Condition D.1.3, 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.

(d) To document the compliance status with Condition D.1.9, the Permittee shall maintain daily records of the visible emission notations of the cutting and grinding booths stacks exhausts. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of a visible emission notation, (e.g. the process did not operate that day).

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

D.1.11 Reporting Requirements

A quarterly summary of the information to document the compliance status with Conditions D.1.1 and D.1.2(a) shall be submitted not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting Requirements contains the Permittee's obligation with regard to the reporting required by this condition. 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 E.1 NESHAP

Emissions Unit Description:

Emission units located at 420 Highway 25 North:

(a) Two (2) hand-held non-atomized mechanical resin application units (flow coaters, flow choppers and/or fluid impingement devices), identified as Application Units #1 and #2, each installed in 2001, each with a maximum capacity of 60.15 pounds of resin per hour. The units are portable and may be located in one or more of the following:

(1) One (1) open mold application booth used to make fiberglass reinforced plastic (FRP) parts, identified as EU-01, constructed in 1992, with dry filters, and exhausting to stack V2.

This booth is located in the resin application area in Plant 1.

(2) One (1) open mold application booth used to make FRP parts, identified as EU-02, constructed in 1992, with dry filters, and exhausting to stack V3.

This booth is located in the resin application area in Plant 1.

(3) One (1) open mold application booth used to make FRP parts, identified as EU-03, constructed in 1992 and modified in 2013, with dry filters, and exhausting to stack V1.

This booth is located in the resin application area in Plant 1 and formerly contained the cutting and grinding (now identified as EU-07) which has been moved to Plant 2.

Under 40 CFR 63, Subpart VWWWW, these facilities are an existing open molding process and are part of an existing affected reinforced plastic composites production source.

(b) One (1) winding area, constructed in 1992, modified in 2001, 2004, 2005, 2006, 2007, 2010, 2015, and 2021, identified as EU-04, located in Plant 1, exhausting to stacks V4 to V12 which are shared with EU-11, and consist of the following:

(1) One (1) chop/winding facility used to make FRP tanks, identified as Application Unit #3, constructed in 2001, consisting of one (1) automated non-atomized mechanical resin application unit (flow coater, flow chopper and/or fluid impingement device), with a maximum capacity of 197.11 pounds of resin per hour, and two (2) steel mandrels, with a maximum mandrel size of forty-eight (48) inches.

Only one (1) mandrel can be sprayed at a time.

Each mandrel exhausts to a separate duct that is equipped with a dry filter, which exhaust to the winding area vent consisting of stacks V4 to V12.

(2) One (1) chop/winding facility used to make FRP tanks, identified as Application Unit #4, constructed in 2001, consisting of one (1) automated non-atomized mechanical resin application units (flow coater, flow chopper and/or fluid impingement device), with a maximum capacity of 272.32 pounds of resin per hour, and two (2) steel mandrels, with a maximum mandrel size of seventy two (72) inches on one and sixty (60) inches on the
Only one (1) mandrel can be sprayed at a time.

Each mandrel exhausts to a separate duct that is equipped with a dry filter, which exhaust to the winding area vent consisting of stacks V4 to V12.

(3) One (1) chop/winding facility used to make FRP tanks, identified as Application Unit #5, constructed in 2004, consisting of one (1) automated non-atomized mechanical resin application units (flow coater, flow chopper and/or fluid impingement device), with a maximum capacity of 175.56 pounds of resin per hour, and two (2) steel mandrels, with a maximum mandrel size of forty (40) inches.

Only one (1) mandrel can be sprayed at a time.

Each mandrel exhausts to a separate duct that is equipped with a dry filter, which exhaust to the winding area vent consisting of stacks V4 to V12.

(4) One (1) chop/winding facility used to make FRP tanks, identified as Application Unit #6, constructed in 2005, consisting of one (1) automated non-atomized mechanical resin application units (flow coater, flow chopper and/or fluid impingement device), with a maximum capacity of 399.81 pounds of resin per hour, and two (2) steel mandrels, with a maximum mandrel size of ten (10) feet on one and ninety (90) inches on the other.

Only one (1) mandrel can be sprayed at a time.

Each mandrel exhausts to a separate duct that is equipped with a dry filter, which exhaust to the winding area vent consisting of stacks V4 to V12.

(5) One (1) chop/winding facility used to make FRP tanks, identified as Application Unit #7, constructed in 2006, consisting of one (1) automated non-atomized mechanical resin application units (flow coater, flow chopper and/or fluid impingement device), with a maximum capacity of 111.04 pounds of resin per hour, and two (2) steel mandrels, with a maximum mandrel size of thirty (30) inches.

Only one (1) mandrel can be sprayed at a time.

Each mandrel exhausts to a separate duct that is equipped with a dry filter, which exhaust to the winding area vent consisting of stacks V4 to V12.

(6) One (1) chop/winding facility used to make FRP tanks, identified as Application Unit #8, constructed in 2007, consisting of one (1) automated non-atomized mechanical resin application units (flow coater, flow chopper and/or fluid impingement device), with a maximum capacity of 166.12 pounds of resin per hour, and two (2) steel mandrels, with a maximum mandrel size of thirty-six (36) inches.

Only one (1) mandrel can be sprayed at a time.

Each mandrel exhausts to a separate duct that is equipped with a dry filter, which exhaust to the winding area vent consisting of stacks V4 to V12.

(7) One (1) chop/winding facility used to make FRP tanks, identified as
Application Unit #9, constructed in 2010, consisting of one (1) automated non-atomized mechanical resin application units (flow coater, flow chopper and/or fluid impingement device), with a maximum capacity of 45.24 pounds of resin per hour, and two (2) steel mandrels, with a maximum mandrel size of eighteen (18) inches.

Only one (1) mandrel can be sprayed at a time.

Each mandrel exhausts to a separate duct that is equipped with a dry filter, which exhaust to the winding area vent consisting of stacks V4 to V12.

(8) One (1) chop/winding facility used to make FRP tanks, identified as Application Unit #10, constructed in 2010, consisting of one (1) automated non-atomized mechanical resin application units (flow coater, flow chopper and/or fluid impingement device), with a maximum capacity of 101.82 pounds of resin per hour, and two (2) steel mandrels, with a maximum mandrel size of twenty-four (24) inches.

Only one (1) mandrel can be sprayed at a time.

Each mandrel exhausts to a separate duct that is equipped with a dry filter, which exhaust to the winding area vent consisting of stacks V4 to V12.

(9) One (1) chop/winding facility used to make FRP tanks, identified as Application Unit #13, constructed in 2015, consisting of (1) automated non-atomized mechanical resin application unit (flow coater, flow chopper, and/or fluid impingement device), with a maximum capacity of 101.82 pounds of resin per hour, and two (2) steel mandrels, with a maximum mandrel size of twenty-four (24) inches.

Only one (1) mandrel can be sprayed at a time.

This unit is portable.

Each mandrel exhausts to a duct that is equipped with a dry filter, which exhaust to the winding area vent consisting of stacks V4 to V12.

(10) One (1) chop/winding facility used to make FRP tanks, identified as Application Unit #14, constructed in 2015, consisting of (1) automated non-atomized mechanical resin application unit (flow coater, flow chopper, and/or fluid impingement device), with a maximum capacity of 101.82 pounds of resin per hour, and two (2) steel mandrels, with a maximum mandrel size of twenty-four (24) inches.

Only one (1) mandrel can be sprayed at a time.

This unit is portable.

Each mandrel exhausts to a duct that is equipped with a dry filter, which exhaust to the winding area vent consisting of stacks V4 to V12.

(11) One (1) chop/winding facility used to make FRP tanks, identified as Application Unit #15, approved in 2021 for construction, consisting of (1) automated non-atomized mechanical resin application unit (flow coater, flow chopper, and/or fluid impingement device), with a maximum capacity of 101.82 pounds of resin per hour, and two (2) steel mandrels, with a maximum mandrel size of twenty-four (24) inches.
Only one (1) mandrel can be sprayed at a time.

This unit is portable.

Each mandrel exhausts to a duct that is using dry filters voluntarily, which exhaust to the winding area vent consisting of stacks V4 to V12.

(12) One (1) chop/winding facility used to make FRP tanks, identified as Application Unit #16, approved in 2021 for construction, consisting of (1) automated non-atomized mechanical resin application unit (flow coater, flow chopper, and/or fluid impingement device), with a maximum capacity of 101.82 pounds of resin per hour, and two (2) steel mandrels, with a maximum mandrel size of twenty-four (24) inches.

Only one (1) mandrel can be sprayed at a time.

This unit is portable.

Each mandrel exhausts to a duct that is using dry filters voluntarily, which exhaust to the winding area vent consisting of stacks V4 to V12.

Under 40 CFR 63, Subpart WWWW, these facilities are an existing open molding process and are part of an existing affected reinforced plastic composites production source.

(c) Gel Coat Applications:

(1) One (1) gel coat application, identified as EU-11, constructed in 2016, using one (1) atomized spray applicator, with a maximum capacity of 20 pounds of gel coat to cover one (1) tank per hour, located in the winding area of Plant 1, using dry filters for control, which exhaust to the winding area vent consisting of stacks V4 to V12 shared with application units #3-#10, #13, and #14.

Under 40 CFR 63, Subpart WWWW, the above facility is an existing open molding process and is part of an existing affected reinforced plastic composites production source.

(2) One (1) touch up/production gel coat application operation, identified as EU-12, constructed in 2016, using a roll-on applicator, with a maximum throughput of 0.60 pounds of gel coat per hour, using no control, exhausting indoors.

Under 40 CFR 63, Subpart WWWW, the above facility is an existing open molding process and is part of an existing affected reinforced plastic composites production source.

(d) One (1) compression molding process, identified as EU-08, consisting of the following:

(1) One (1) compression molding process, identified as CMP-1, constructed in 2015, using styrene-based sheet molding compound or bulk molding compound, with a maximum capacity of 356.2 pounds of sheet molding compound or bulk molding compound per hour, exhausting to general ventilation, with no control.
One (1) compression molding process, identified as CMP-2, constructed in 2015, using styrene-based sheet molding compound or bulk molding compound, with a maximum capacity of 356.2 pounds of sheet molding compound or bulk molding compound per hour, exhausting to general ventilation, with no control.

One (1) compression molding process, identified as CMP-3, constructed in 2015, using styrene-based sheet molding compound or bulk molding compound, with a maximum capacity of 102 pounds of sheet molding compound or bulk molding compound per hour, exhausting to general ventilation, with no control.

One (1) compression molding process, identified as CMP-4, constructed in 2015, using styrene-based sheet molding compound or bulk molding compound, with a maximum capacity of 48 pounds of sheet molding compound or bulk molding compound per hour, exhausting to general ventilation, with no control.

One (1) compression molding process, identified as CMP-5, constructed in 2015, using styrene-based sheet molding compound or bulk molding compound, with a maximum capacity of 102 pounds of sheet molding compound or bulk molding compound per hour, exhausting to general ventilation, with no control.

One (1) compression molding process, identified as CMP-6, constructed in 2015, using styrene-based sheet molding compound or bulk molding compound, with a maximum capacity of 102 pounds of sheet molding compound or bulk molding compound per hour, exhausting to general ventilation, with no control.

Under 40 CFR 63, Subpart VWWWWW, these facilities are an existing closed molding process and are part of an existing affected reinforced plastic composites production source.

Emission units located at 1235 East 4th Street:

Two (2) hand-held non-atomized mechanical resin application units (flow coaters, flow choppers and/or fluid impingement devices), identified as Application Units #11 and #12, each constructed in 2013, each with a maximum capacity of 60.15 pounds of resin per hour.

The units are portable and may be located in one or more of the following:

One (1) open mold application booth used to make fiberglass reinforced plastic (FRP) parts, identified as EU-05, constructed in 2013, with dry filters, and exhausting to stacks V101 through V107.

This booth is located in the resin application area of Plant 2.

One (1) open mold application booth used to make fiberglass reinforced plastic (FRP) parts, identified as EU-06, constructed in 2013, with dry filters, and exhausting to stacks V101 through V107.

This booth is located in the resin application area of Plant 2.
Under 40 CFR 63, Subpart WWWW, these facilities are an existing open molding process and are part of an existing affected reinforced plastic composites production 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)]


<table>
<thead>
<tr>
<th>No.</th>
<th>Section</th>
</tr>
</thead>
<tbody>
<tr>
<td>(a)</td>
<td>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.</td>
</tr>
<tr>
<td>(b)</td>
<td>Pursuant to 40 CFR 63.10, the Permittee shall submit all required notifications and reports to:</td>
</tr>
<tr>
<td></td>
<td>Indiana Department of Environmental Management</td>
</tr>
<tr>
<td></td>
<td>Compliance and Enforcement Branch, Office of Air Quality</td>
</tr>
<tr>
<td></td>
<td>100 North Senate Avenue</td>
</tr>
<tr>
<td></td>
<td>MC 61-53 IGCN 1003</td>
</tr>
<tr>
<td></td>
<td>Indianapolis, Indiana 46204-2251</td>
</tr>
</tbody>
</table>


The Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart WWWW (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:

<table>
<thead>
<tr>
<th>No.</th>
<th>Section</th>
</tr>
</thead>
<tbody>
<tr>
<td>(1)</td>
<td>40 CFR 63.5780</td>
</tr>
<tr>
<td>(2)</td>
<td>40 CFR 63.5785(a)</td>
</tr>
<tr>
<td>(3)</td>
<td>40 CFR 63.5790</td>
</tr>
<tr>
<td>(4)</td>
<td>40 CFR 63.5795</td>
</tr>
<tr>
<td>(5)</td>
<td>40 CFR 63.5796</td>
</tr>
<tr>
<td>(6)</td>
<td>40 CFR 63.5797</td>
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<tr>
<td>(7)</td>
<td>40 CFR 63.5798</td>
</tr>
<tr>
<td>(8)</td>
<td>40 CFR 63.5799(b)</td>
</tr>
<tr>
<td>(9)</td>
<td>40 CFR 63.5800</td>
</tr>
<tr>
<td>(10)</td>
<td>40 CFR 63.5805(a), (b), (e), (f), and (g)</td>
</tr>
<tr>
<td>(11)</td>
<td>40 CFR 63.5810</td>
</tr>
<tr>
<td>(12)</td>
<td>40 CFR 63.5835(a) and (c)</td>
</tr>
<tr>
<td>(13)</td>
<td>40 CFR 63.5840</td>
</tr>
<tr>
<td>(14)</td>
<td>40 CFR 63.5860(a)</td>
</tr>
<tr>
<td>(15)</td>
<td>40 CFR 63.5895(c) and (d)</td>
</tr>
<tr>
<td>(16)</td>
<td>40 CFR 63.5900(a)(2)-(4), (b), and (c)</td>
</tr>
<tr>
<td>(17)</td>
<td>40 CFR 63.5905</td>
</tr>
<tr>
<td>(18)</td>
<td>40 CFR 63.5910(a), (b), (c)(1)-(3)and (5), (d), (g), (h), and (i)</td>
</tr>
<tr>
<td>(19)</td>
<td>40 CFR 63.5915(a), (c), and (d)</td>
</tr>
<tr>
<td>(20)</td>
<td>40 CFR 63.5920</td>
</tr>
<tr>
<td>(21)</td>
<td>40 CFR 63.5925</td>
</tr>
<tr>
<td>(22)</td>
<td>40 CFR 63.5930</td>
</tr>
<tr>
<td>(23)</td>
<td>40 CFR 63.5935</td>
</tr>
</tbody>
</table>
(24) Tables 1, 3, 4, 7, 8, 9, 13, 14, and 15 of Subpart WWWW (applicable portions)
(25) Appendix A to Subpart WWWW of Part 63—Test Method for Determining Vapor Suppressant Effectiveness
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
PART 70 OPERATING PERMIT
CERTIFICATION

Source Name: Topp Industries, Inc.
Source Address: 420 Highway 25 North and 1235 East 4th Street, Rochester, Indiana 46975
Part 70 Permit No.: T049-37849-00018

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

Source Name: Topp Industries, Inc.
Source Address: 420 Highway 25 North and 1235 East 4th Street, Rochester, Indiana 46975
Part 70 Permit No.: T049-37849-00018

This form consists of 2 pages
Page 1 of 2

☐ 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?</td>
</tr>
</tbody>
</table>

Type of Pollutants Emitted: TSP, PM-10, SO₂, VOC, NOₓ, CO, Pb, other:

Estimated amount of pollutant(s) emitted during emergency:

Describe the steps taken to mitigate the problem:

Describe the corrective actions/response steps taken:

Describe the measures taken to minimize emissions:

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:

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: Topp Industries, Inc.
Source Address: 420 Highway 25 North and 1235 East 4th Street, Rochester, Indiana 46975
Part 70 Permit No.: T049-31318-00018
Facility:

<table>
<thead>
<tr>
<th>Emission units located at 420 Highway 25 North</th>
</tr>
</thead>
<tbody>
<tr>
<td>Application Unit #1</td>
</tr>
<tr>
<td>Application Unit #4</td>
</tr>
<tr>
<td>Application Unit #7</td>
</tr>
<tr>
<td>Application Unit #10</td>
</tr>
<tr>
<td>Application Unit #15</td>
</tr>
<tr>
<td>EU12</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Emission units located at 1235 East 4th Street</th>
</tr>
</thead>
<tbody>
<tr>
<td>Application Unit #11</td>
</tr>
</tbody>
</table>

Parameter: VOC emissions
Limit: The total VOC emissions from the use of resins, catalysts, gel coats, and clean-up solvents for the above mentioned application resin and gel coat units shall not exceed ninety-nine (99) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

QUARTER: ____________________  YEAR: ____________________

<table>
<thead>
<tr>
<th>Month</th>
<th>VOC (tons)</th>
<th>VOC (tons)</th>
<th>VOC (tons)</th>
</tr>
</thead>
<tbody>
<tr>
<td>This Month</td>
<td>Previous 11 Months</td>
<td>12 Month Total</td>
<td></td>
</tr>
</tbody>
</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 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Topp Industries, Inc.
Source Address: 420 Highway 25 North and 1235 East 4th Street, Rochester, Indiana 46975
Part 70 Permit No.: T049-37849-00018

Months: _________ to __________ Year: __________

This report shall be submitted quarterly based on a calendar year. Proper notice submittal under Section B - Emergency Provisions satisfies the reporting requirements of paragraph (a) of Section C - General Reporting. Any deviation from the requirements of this permit, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

- [ ] NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.
- [ ] THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

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

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

<table>
<thead>
<tr>
<th>Permit Requirement</th>
<th>Date of Deviation</th>
<th>Duration of Deviation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Number of Deviations:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Probable Cause of Deviation:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Response Steps Taken:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Permit Requirement</th>
<th>Date of Deviation</th>
<th>Duration of Deviation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Number of Deviations:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Probable Cause of Deviation:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Response Steps Taken:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Form Completed by: ____________________________
Title / Position: ____________________________
Date: ____________________________
Phone: ____________________________
Source Name: Topp Industries, Inc.
Source Location: 420 Highway 25 North, Rochester, Indiana 46975
1235 East 4th Street, Rochester, Indiana 46975
County: Fulton
SIC Code: 3089 (Plastic Products, Not Elsewhere Classified)
Operation Permit No.: T049-37849-00018
Operation Permit Issuance Date: June 26, 2017
Significant Source Modification No.: 049-43425-00018
Significant Permit Modification No.: 049-43448-00018
Permit Reviewer: Andrea M. Smith

Source Definition

This stationary fiberglass reinforced plastics tank and sewer parts manufacturing operations consists of two (2) plants:

(a) Plant 1 is located at 420 Highway 25 North, Rochester, Indiana and

(b) Plant 2 is located at 1235 East 4th Street, Rochester, Indiana

These plants are located on adjacent properties, have the same SIC codes and are under common control; therefore, they are considered one (1) source, as defined by 326 IAC 2-7-1(22).

This determination was initially made under Significant Permit Modification No. 049-33527-00018, issued on January 2, 2014.

This determination is not being re-evaluated in this modification.

Existing Approvals

The source was issued Part 70 Operating Permit Renewal No. T049-37849-00018 on June 26, 2017. The source has since received the following approval:

TV Interim SSM No. 049-43425I-00018 issued on December 2, 2020.
The source is located in Fulton County.

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Designation</th>
</tr>
</thead>
<tbody>
<tr>
<td>SO(_2)</td>
<td>Better than national standards.</td>
</tr>
<tr>
<td>CO</td>
<td>Unclassifiable or attainment effective November 15, 1990.</td>
</tr>
<tr>
<td>O(_3)</td>
<td>Unclassifiable or attainment effective January 16, 2018, for the 2015 8-hour ozone standard.</td>
</tr>
<tr>
<td>PM(_{2.5})</td>
<td>Unclassifiable or attainment effective April 15, 2015, for the 2012 annual PM(_{2.5}) standard.</td>
</tr>
<tr>
<td>PM(_{2.5})</td>
<td>Unclassifiable or attainment effective December 13, 2009, for the 2006 24-hour PM(_{2.5}) standard.</td>
</tr>
<tr>
<td>PM(_{10})</td>
<td>Unclassifiable effective November 15, 1990.</td>
</tr>
<tr>
<td>NO(_2)</td>
<td>Unclassifiable or attainment effective January 29, 2012, for the 2010 NO(_2) standard.</td>
</tr>
<tr>
<td>Pb</td>
<td>Unclassifiable or attainment effective December 31, 2011, for the 2008 lead standard.</td>
</tr>
</tbody>
</table>

(a) Ozone Standards
Volatile organic compounds (VOC) and Nitrogen Oxides (NO\(_x\)) 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 NO\(_x\) emissions are considered when evaluating the rule applicability relating to ozone. Fulton County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO\(_x\) emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) PM\(_{2.5}\)
Fulton County has been classified as attainment for PM\(_{2.5}\). Therefore, direct PM\(_{2.5}\), SO\(_2\), and NO\(_x\) emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(c) Other Criteria Pollutants
Fulton 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](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>
<th>PM¹</th>
<th>PM₁₀¹</th>
<th>PM₂₅¹,²</th>
<th>SO₂</th>
<th>NOₓ</th>
<th>VOC</th>
<th>CO</th>
<th>Single HAP³</th>
<th>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total PTE of Entire Source Excluding Fugitive Emissions*</td>
<td>52.11</td>
<td>42.61</td>
<td>42.61</td>
<td>0.03</td>
<td>5.67</td>
<td>121.37</td>
<td>4.76</td>
<td>117.92</td>
<td>118.09</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>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>--</td>
<td>--</td>
</tr>
</tbody>
</table>

¹Under the Part 70 Permit program (40 CFR 70), PM₁₀ and PM₂₅, not particulate matter (PM), are each considered as a "regulated air pollutant."
²PM₂₅ listed is direct PM₂₅.
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 Part 70 Operating Permit Renewal No. T049-37849-00018, issued on June 26, 2017.

Description of Proposed Modification

The Office of Air Quality (OAQ) has reviewed an application, submitted by Topp Industries, Inc. on October 27, 2020, relating to the following:

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):

(1) Adding two (2) chop/winding units in the Winding Area EU-04:

(b) One (1) winding area, constructed in 1992, modified in 2001, 2004, 2005, 2006, 2007, 2010, and 2015, and 2021, identified as EU-04, located in Plant 1, exhausting to stacks V4 to V12 which are shared with EU-11, and consist of the following:
(11) One (1) chop/winding facility used to make FRP tanks, identified as Application Unit #15, approved in 2021 for construction, consisting of (1) automated non-atomized mechanical resin application unit (flow coater, flow chopper, and/or fluid impingement device), with a maximum capacity of 101.82 pounds of resin per hour, and two (2) steel mandrels, with a maximum mandrel size of twenty-four (24) inches.

Only one (1) mandrel can be sprayed at a time.

This unit is portable.

Each mandrel exhausts to a duct that is using dry filters voluntarily, which exhaust to the winding area vent consisting of stacks V4 to V12.

(12) One (1) chop/winding facility used to make FRP tanks, identified as Application Unit #16, approved in 2021 for construction, consisting of (1) automated non-atomized mechanical resin application unit (flow coater, flow chopper, and/or fluid impingement device), with a maximum capacity of 101.82 pounds of resin per hour, and two (2) steel mandrels, with a maximum mandrel size of twenty-four (24) inches.

Only one (1) mandrel can be sprayed at a time.

This unit is portable.

Each mandrel exhausts to a duct that is using dry filters voluntarily, which exhaust to the winding area vent consisting of stacks V4 to V12.

(2) Adding one (1) powder coating booth to Plant #1:

(h) Two (2) powder coating booths:

(1) One (1) powder coating booth, identified as EU-09...

(2) One (1) powder coating booth, identified as EU-13, approved in 2021 for construction, equipped with an integral powder overspray capture filter bank (CE-3), with a nominal capacity of fourteen and seven hundred thousandths (14.7) pounds of powder per hour, a nominal product throughput rate of 1,920 lbs/hr of metal parts, and exhausting within the building. EU-13 consists of one (1) powder coating application gun and a conveyor system.

---

**“Integral Part of the Process” Determination - New Unit**

Topp Industries, Inc. has submitted the following information to justify why the powder recovery system should be considered an integral part of powder coating booth EU-13 described below.

One (1) powder coating booth, identified as EU-13, approved in 2021 for construction, equipped with an integral powder recovery system (CE-3), with a nominal capacity of 14.7 pounds of powder per hour, a nominal product throughput rate of 1,920 lbs/hr of metal parts, and exhausting within the building. EU-13 consists of one (1) powder coating application gun and a conveyor system. CE-3 consists of a bank of filters and a compressor.

a) **Is the primary purpose of the equipment to control air pollution?**
The powder recovery system consists of filters and a compressor. This powder recovery system is for powder recovery for reuse. The powder coating booth and the powder recovery system are designed so overspray powder is collected and reused when the booth is in operation. They are designed so that the powder coating booth may not operate if the powder recovery system is not functioning. Therefore, the primary purpose of the powder recovery system is not to control air pollution. Its primary purpose is to collect and recover powder for reuse in the powder coating booth. By using one color (black) in the powder coating booth, one hundred percent (100%) of the overspray captured can be reused.

b) Where the equipment is recovering product, how do the cost savings from the product recovery compare to the cost of the equipment?

The recovery components of the powder recovery system include filters and a recovery system requiring a compressor. The total cost of the powder recovery system is $396,000. The filters for this unit cost around $1,000 per year. The total initial investment annualized over 30 years plus the yearly filter replacement is $14,233.33 per year.

The table below summarizes the cost analysis of the powder recovery system associated with the powder coating booth and based on the analysis, there is significant economic benefit to install the powder recovery system.

<table>
<thead>
<tr>
<th>Initial Investment</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Powder Recovery System</td>
<td>$396,000</td>
</tr>
<tr>
<td>Original Filter</td>
<td>$1,000</td>
</tr>
<tr>
<td><strong>Total Investment Cost</strong></td>
<td>$397,000</td>
</tr>
<tr>
<td><strong>Lifetime of Powder Recovery System</strong></td>
<td>30 years</td>
</tr>
<tr>
<td><strong>Projected Total Investment Annualized Over 30 Years</strong></td>
<td>$13,233.33</td>
</tr>
</tbody>
</table>

| Annual Maintenance                                     |       |
| Filter                                                 | $1,000 |

<table>
<thead>
<tr>
<th>Operations and Recovery</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Maximum Hourly Rates</td>
<td></td>
</tr>
<tr>
<td>Max Cost of powder coating used</td>
<td>$2.99 per pound</td>
</tr>
<tr>
<td>Maximum rate of powder coating used</td>
<td>14.73 lb/hour</td>
</tr>
<tr>
<td>Maximum cost of the powder coating used</td>
<td>$44.04/hour</td>
</tr>
<tr>
<td>Percent of Overspray</td>
<td>50%</td>
</tr>
<tr>
<td>Efficiency of the Powder Recovery System</td>
<td>99.50%</td>
</tr>
<tr>
<td>Maximum rate of recovered and re-use powder coating</td>
<td>$7.33 lb/hr</td>
</tr>
<tr>
<td>Savings from the recovered and reused of powder coating</td>
<td>$21.91/hr</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Results Summary</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Savings from the reused of recovered powder coating</td>
<td>$32,866.86</td>
</tr>
<tr>
<td>Total annual maintenance/operations cost</td>
<td>$14,233.33</td>
</tr>
<tr>
<td>Projected total annual savings from the reuse of recovered powder:</td>
<td>$18,633.53</td>
</tr>
</tbody>
</table>

c) Would the equipment be installed if no air quality regulations are in place?

The powder recovery system would be installed even if no air quality regulations were in place. The primary reason for installing and maintaining the powder recovery system is to reduce operational costs.
d) Conclusion

IDEM, OAQ evaluated the information submitted and agrees that the powder recovery system should be considered an integral part of the powder coating booth EU-13. Therefore, the potential to emit PM, PM10 and PM2.5 from the powder coating booth will be calculated after the powder recovery system for purposes of determining permitting level and applicability of 326 IAC 6-3.

<table>
<thead>
<tr>
<th>&quot;Integral Part of the Process&quot; Determination - Existing Units</th>
</tr>
</thead>
</table>

As part of Significant Source Modification No. 049-35273-00018, issued on March 27, 2015, IDEM, OAQ previously determined that the powder overspray capture filter bank is an integral part of the powder coating booth operation, EU-09.

IDEM, OAQ is not reevaluating this integral justification at this time. Therefore, the potential to emit particulate matter from the powder coating booth operation EU-09 will continue to be calculated after the powder overspray capture filter bank for purposes of determining permitting level and applicability of specify other rules, such as 326 IAC 2-2, 326 IAC 6-3. Operating conditions in the proposed permit will specify that the powder overspray capture filter bank shall operate at all times when the powder coating booth operation EU-09 are in operation.

<table>
<thead>
<tr>
<th>Enforcement Issues</th>
</tr>
</thead>
</table>

There are no pending enforcement actions related to this modification.

<table>
<thead>
<tr>
<th>Emission Calculations</th>
</tr>
</thead>
</table>

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

<table>
<thead>
<tr>
<th>Permit Level Determination – Part 70 Modification to an Existing Source</th>
</tr>
</thead>
</table>

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>PM10</th>
<th>PM2.5</th>
<th>SO2</th>
<th>NOx</th>
<th>VOC</th>
<th>CO</th>
<th>Single HAP</th>
<th>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Application Unit #15</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>17.36</td>
<td>--</td>
<td>17.17</td>
<td>17.17</td>
</tr>
<tr>
<td>Application Unit #16</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>17.36</td>
<td>--</td>
<td>17.17</td>
<td>17.17</td>
</tr>
<tr>
<td>Powder Coating Booth EU-13(^3)</td>
<td>0.16</td>
<td>0.16</td>
<td>0.16</td>
<td>--</td>
<td>--</td>
<td>34.71</td>
<td>--</td>
<td>34.34</td>
<td>34.34</td>
</tr>
</tbody>
</table>

\(^1\)PM\(_{2.5}\) listed is direct PM\(_{2.5}\).
\(^2\)Single highest HAP.
\(^3\)The Powder Recovery System is determined to be integral control for Powder Coating Booth EU-13.

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 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.
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 modification. See Technical Support Document (TSD) State Rule Applicability - Entire Source section, 326 IAC 2-2 (PSD) for more information regarding the limit(s).

(a) 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></th>
<th>PM</th>
<th>PM&lt;sub&gt;10&lt;/sub&gt;</th>
<th>PM&lt;sub&gt;2.5&lt;/sub&gt;&lt;sup&gt;1&lt;/sup&gt;</th>
<th>SO&lt;sub&gt;2&lt;/sub&gt;</th>
<th>NO&lt;sub&gt;x&lt;/sub&gt;</th>
<th>VOC</th>
<th>CO</th>
<th>Single HAP&lt;sup&gt;3&lt;/sup&gt;</th>
<th>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total PTE of Entire Source Excluding Fugitives&lt;sup&gt;*, **&lt;/sup&gt;</td>
<td>52.25</td>
<td>42.77</td>
<td>42.77</td>
<td>0.03</td>
<td>5.67</td>
<td>121.37</td>
<td>4.76</td>
<td>117.92</td>
<td>118.09</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>10</td>
<td>25</td>
<td></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>

<sup>1</sup>Under the Part 70 Permit program (40 CFR 70), PM<sub>10</sub> and PM<sub>2.5</sub>, not particulate matter (PM), are each considered as a "regulated air pollutant."

<sup>2</sup>PM<sub>2.5</sub> listed is direct PM<sub>2.5</sub>.

<sup>3</sup>Single highest source-wide HAP

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

**The Powder Recovery System is determined to be integral control for Powder Coating Booth EU-13
(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 area source of HAP will continue to be an area source of HAP, as defined in 40 CFR 63.2, because HAP emissions will continue to be less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, this source is an area 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) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this proposed modification.

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

(a) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Wet-Formed Fiberglass Mat Production, 40 CFR 63, Subpart HHH and 326 IAC 20-52 are not included in the permit for the two (2) chop/winding facilities, since two (2) chop/winding facilities do not contain a drying and curing oven at a we-formed fiberglass mat production facility.

(b) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Metal Parts and Products, 40 CFR 63, Subpart MMMM and 326 IAC 20-80 are not included in the permit for powder coating booth EU-13, since powder coating booth EU-13 does not contain organic HAP.

(c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Boat Manufacturing, 40 CFR 63, Subpart VVVV and 326 IAC 20-48 are not included in the permit for the two (2) chop/winding facilities, since the source does not manufacture fiberglass boats or aluminum recreational boats.

(d) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Plastic Parts and Products, 40 CFR 63, Subpart PPPP and 326 IAC 20-81 are not included in the permit for the two (2) chop/winding facilities, since the two (2) chop/winding facilities only perform in-mold surface coating of mold release agents. Pursuant to 40 CFR 63.4481(c)(6), Subpart PPPP does not apply to in-mold surface coating or fell coat operations used in the manufacture of reinforced plastic composites production (Subpart WWWW).

(e) This source is subject to the National Emission Standards for Hazardous Air Pollutants for Reinforced Plastics Composites Production, 40 CFR 63, Subpart WWWW, which is incorporated by reference as 326 IAC 20-56, because this source operates a reinforced plastic composites production facility using gel coats and resins containing styrene that is located at a major source of HAP emissions. The units subject to this rule include the following:

Application Unit #15 and Application Unit #16 added to the winding area identified as EU-04.

The application units are subject to the following portions of Subpart WWWW:

(1) 40 CFR 63.5780
(2) 40 CFR 63.5785(a)
(3) 40 CFR 63.5790
(4) 40 CFR 63.5795
The requirements of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated as 326 IAC 20-1, apply to the application units except as otherwise specified in 40 CFR 63, Subpart WWWW.

These are existing requirements for the source which were modified during this modification to include the two (2) new application units.

(f) 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):**

(a) 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.

(b) 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:
### 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>Powder Coating Booth EU-13/PM</td>
<td>CFB</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>N</td>
<td>-</td>
</tr>
<tr>
<td>Powder Coating Booth EU-13/PM10</td>
<td>CFB</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>N</td>
<td>-</td>
</tr>
<tr>
<td>Powder Coating Booth EU-13/PM2.5</td>
<td>CFB</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>N</td>
<td>-</td>
</tr>
</tbody>
</table>

Under the Part 70 Permit program (40 CFR 70), PM is not a regulated air pollutant.

Uncontrolled PTE (tpy) and controlled PTE (tpy) are evaluated against the Major Source Threshold for each pollutant. Major Source Threshold for regulated air 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.

N

Pursuant to 40 CFR Part 64.1, the control devices are considered to be inherent process equipment. Therefore, based on the evaluation, the requirements of 40 CFR 64, CAM are not applicable.

Controls: DF = Dry Filter, CFB = Capture Filter Bank

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

### Inherent Process Equipment

Pursuant to 40 CFR Part 64.1, the definition of inherent process equipment is "equipment that is necessary for the proper or safe functioning of the process, or material recovery equipment that the owner or operator documents is installed and operated primarily for purposes other than compliance with air pollution regulations. Equipment that must be operated at an efficiency higher than that achieved during normal process operations in order to comply with the applicable emission limitation or standard is not inherent process equipment. For the purposes of this part, inherent process equipment is not considered subject to CAM."

The capture filter bank is determined to be necessary for the normal and proper operation of the powder coating booth EU-13 (see the "Air Pollution Control Justification as an Integral Part of the Process" section above for more detail). Therefore, the capture filter bank meets the criteria for inherent to the process for the purpose of determining CAM applicability, and is not considered control devices. Therefore, the requirements of 40 CFR Part 64.2, CAM, do not apply to the capture filter bank.

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) and 326 IAC 2-3 (Emission Offset)**

PSD and Emission Offset applicability is discussed under the Permit Level Determination – PSD section of this document.

**PSD Minor Source Limits**

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the Permittee shall comply with the following:

The total VOC emissions from the use of resins, catalysts, gel coats, and clean-up solvents by the following application resin and gel coats units shall not exceed ninety-nine (99) tons per twelve (12) consecutive month period with compliance determined at the end of each month:

Emission units located at 420 Highway 25 North:

(a) Application Unit #1
(b) Application Unit #2
(c) Application Unit #3
(d) Application Unit #4
(e) Application Unit #5
(f) Application Unit #6
(g) Application Unit #7
(h) Application Unit #8
(i) Application Unit #9
(j) Application Unit #10
(k) Application Unit #13
(l) Application Unit #14
(m) Application Unit #15
(n) Application Unit #16
(o) Gel coat application, EU-11
(p) Touch up/production gel coat application operation, EU-12

Emission units located at 1235 East 4th Street:
(q) Application Unit#11
(r) Application Unit#12
(s) Mold release agents

Compliance with these limits, combined with the potential to emit VOC from all other emission units at this source, shall limit the source-wide total potential to emit of VOC to less than 250 tons per twelve (12) consecutive month period, and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

Compliance with this limit will directly affect the styrene emissions since the VOC that is emitted is only Styrene; therefore, it will directly reduce the HAP emitted from the units above to the same tons per twelve (12) consecutive months as the VOC limits.

The VOC limit is an existing limit which was modified during this modification to include the two (2) new application units (m) and (n).

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 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 2-6 (Emission Reporting)
This source is subject to the requirements of 326 IAC 2-6 (Emission Reporting), since it is required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program. Pursuant to 326 IAC 2-6-3(a)(2), the Permittee shall submit triennially, by July 1, an emission statement covering the previous calendar year in accordance with the compliance schedule in 326 IAC 2-6-3. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.
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 5-1 (Opacity Limitations)
This source is subject to the opacity limitations specified in 326 IAC 5-1-2(1)

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.

326 IAC 6.5 (Particulate Matter Limitations Except Lake County)
Pursuant to 326 IAC 6.5-1-1(a), this source (located in Fulton County) is not subject to the requirements of 326 IAC 6.5 because it is not located in one of the following counties: Clark, Dearborn, Dubois, Howard, Marion, St. Joseph, Vanderburgh, Vigo or Wayne.

326 IAC 6.8 (Particulate Matter Limitations for Lake County)
Pursuant to 326 IAC 6.8-1-1(a), this source (located in Fulton County) is not subject to the requirements of 326 IAC 6.8 because it is not located in Lake County.

**State Rule Applicability – Individual Facilities**

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

Application Unit #15 & Application Unit #16

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
Even though, these Application Unit #15 and Application Unit #16 were constructed after January 1, 1980, they are not subject to the requirements of 326 IAC 8-1-6 because each of their unlimited VOC potential emissions are regulated by 326 IAC 20-56.

326 IAC 20-56-2 (Operator Training)
The provisions of 326 IAC 20-56-2 apply to the source because the source operates a Reinforced Plastic Composites Production operation.

Pursuant to 326 IAC 20-56-2, as of April 21, 2006, the Permittee 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 326 IAC 20-56-2 (b) 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 subdivision (1) if written documentation that the employee’s training is current is provided to the new employer.
(d) The lesson plans shall cover, for the initial and refresher training, at a minimum, all of the following topics:

(1) Appropriate application techniques
(2) Appropriate equipment cleaning procedures.
(3) Appropriate equipment setup and adjustment to minimize material usage and overspray.

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

(1) A copy of the current training program.
(2) A list of the following:
   (A) All current personnel, by name, that are required to be trained.
   (B) The date the person was trained or date of most recent refresher training, whichever is later.

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

**Powder Coating Booth EU-13**

**326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)**

Since the powder coating booth EU-13 as potential emissions less than 0.551 pound per hour after consideration of the integral control device(s), pursuant to 326 IAC 6-3-1(b)(14), it is exempt from the requirements of 326 IAC 6-3-2.

However, since the powder coating booth has potential emissions greater than 0.551 pound per hour prior to consideration of the integral control device(s), in order to assure the Facility(s) and/or Process(s) are not subject to the requirements of 326 IAC 6-3-2, the integral control device(s) shall be in operation and control emissions from the powder coating booth at all times the powder coating booth is in operation.

<table>
<thead>
<tr>
<th>Facility or Process Description</th>
<th>Emission Unit ID</th>
<th>PTE Prior to Integral Device</th>
<th>PTE After Integral Device</th>
</tr>
</thead>
<tbody>
<tr>
<td>Powder Coating Booth EU-13</td>
<td>EU-13</td>
<td>7.37 lb/hr</td>
<td>0.04 lb/hr</td>
</tr>
</tbody>
</table>

**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:

VOC

(1) Compliance with the VOC content and usage limitations under 326 IAC 2-2 (PSD) 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.

(2) VOC emissions from resins shall be calculated by multiplying the usage of each resin by the emission factor provided by the “Unified Emission Factors for Open Molding of Composites,” American Composites Manufacturers Association (ACMA), October 13, 2009 or its updates. VOC emissions from all other operations shall be calculated by multiplying the usage of each VOC containing solvent and coating by the VOC content of the material.

(3) Compliance with the limits under 326 IAC 2-2 shall be determined based upon the following criteria:

(A) Monthly usage by weight, content of monomer that is HAP, method of application, and other emission reduction techniques used for each resin shall be recorded.

Volatile organic HAP emissions shall be calculated by multiplying the usage of each resin by the emission factor that is appropriate for the HAP monomer content, method of application, and other emission reduction techniques used for each resin, and summing the emissions for all resins.

Emission factors shall be obtained from the reference approved by IDEM, OAQ.

(B) The emission factors approved for use by IDEM, OAQ shall be taken from the following reference: “Unified Emission Factors for Open Molding of Composites,” American Composites Manufacturers Association (ACMA), October 13, 2009 or its updates, with the exception of the emission factors for controlled spray application. This reference is included with this permit.

For HAP-emitting operations not addressed by this reference, emission factors shall be taken from U.S. EPA’s AP-42 document.

For the purposes of these emission calculations, HAP monomer in resins that is not styrene or methyl methacrylate shall be considered as styrene on an equivalent weight basis.

PM

(1) In order to ensure that the powder coating booth EU-13 is exempt from the requirements of 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the integral powder overspray capture filter bank shall be in operation at all times that the powder coating booth is in operation.

Testing Requirements:

IDEM OAQ has determined that testing of powder coating booth EU-13 is not required at this time to determine compliance with the PM emission limits. IDEM has the authority to require testing at a later time if necessary to demonstrate compliance with any applicable requirement.
(b) The Compliance Monitoring Requirements applicable to this proposed modification are as follows:

There are no new or modified compliance requirements included with this modification. Visual Emission Notations listed in the existing permit will apply to Application Unit #15 and Application Unit #16, but there are no changes being made to the requirements listed in Section D.1.9 Visible Emissions Notations in the permit.

<table>
<thead>
<tr>
<th>Proposed Changes</th>
</tr>
</thead>
</table>

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):

1. Adding two (2) chop/winding units in the Winding Area EU-04:
   
   (b) One (1) winding area, constructed in 1992, modified in 2001, 2004, 2005, 2006, 2007, 2010, and **2021**, identified as EU-04, located in Plant 1, exhausting to stacks V4 to V12 which are shared with EU-11, and consist of the following:

   ...  

   (11) One (1) chop/winding facility used to make FRP tanks, identified as Application Unit #15, approved in 2021 for construction, consisting of (1) automated non-atomized mechanical resin application unit (flow coater, flow chopper, and/or fluid impingement device), with a maximum capacity of 101.82 pounds of resin per hour, and two (2) steel mandrels, with a maximum mandrel size of twenty-four (24) inches.

   Only one (1) mandrel can be sprayed at a time.

   This unit is portable.

   Each mandrel exhausts to a duct that is using dry filters voluntarily, which exhaust to the winding area vent consisting of stacks V4 to V12.

   (12) One (1) chop/winding facility used to make FRP tanks, identified as Application Unit #16, approved in 2021 for construction, consisting of (1) automated non-atomized mechanical resin application unit (flow coater, flow chopper, and/or fluid impingement device), with a maximum capacity of 101.82 pounds of resin per hour, and two (2) steel mandrels, with a maximum mandrel size of twenty-four (24) inches.

   Only one (1) mandrel can be sprayed at a time.

   This unit is portable.

   Each mandrel exhausts to a duct that is using dry filters voluntarily, which exhaust to the winding area vent consisting of stacks V4 to V12.

2. Adding one (1) powder coating booth to Plant #1:

   (h) Two (2) powder coating booths:
(1) One (1) powder coating booth, identified as EU-09...

(2) One (1) powder coating booth, identified as EU-13, approved in 2021 for construction, equipped with an integral powder overspray capture filter bank (CE-3), with a nominal capacity of fourteen and seven hundred thousandths (14.7) pounds of powder per hour, a nominal product throughput rate of 1,920 lbs/hr of metal parts, and exhausting within the building. EU-13 consists of one (1) powder coating application gun and a conveyor system.

(3) Changing Sections D and E to include the any changes made by the above-mentioned actions:

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

<table>
<thead>
<tr>
<th>Emissions Unit Description:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emission units located at 420 Highway 25 North:</td>
</tr>
<tr>
<td>...</td>
</tr>
<tr>
<td>(b) One (1) winding area, constructed in 1992, modified in 2001, 2004, 2005, 2006, 2007, 2010, and 2015, and 2021, identified as EU-04, located in Plant 1, exhausting to stacks V4 to V12 which are shared with EU-11, and consist of the following:</td>
</tr>
<tr>
<td>...</td>
</tr>
<tr>
<td>(11) One (1) chop/winding facility used to make FRP tanks, identified as Application Unit #15, approved in 2021 for construction, consisting of (1) automated non-atomized mechanical resin application unit (flow coater, flow chopper, and/or fluid impingement device), with a maximum capacity of 101.82 pounds of resin per hour, and two (2) steel mandrels, with a maximum mandrel size of twenty-four (24) inches.</td>
</tr>
<tr>
<td>Only one (1) mandrel can be sprayed at a time.</td>
</tr>
<tr>
<td>This unit is portable.</td>
</tr>
<tr>
<td>Each mandrel exhausts to a duct that is using dry filters voluntarily, which exhaust to the winding area vent consisting of stacks V4 to V12.</td>
</tr>
<tr>
<td>(12) One (1) chop/winding facility used to make FRP tanks, identified as Application Unit #16, approved in 2021 for construction, consisting of (1) automated non-atomized mechanical resin application unit (flow coater, flow chopper, and/or fluid impingement device), with a maximum capacity of 101.82 pounds of resin per hour, and two (2) steel mandrels, with a maximum mandrel size of twenty-four (24) inches.</td>
</tr>
<tr>
<td>Only one (1) mandrel can be sprayed at a time.</td>
</tr>
<tr>
<td>This unit is portable.</td>
</tr>
<tr>
<td>Each mandrel exhausts to a duct that is using dry filters voluntarily, which exhaust to the winding area vent consisting of stacks V4 to V12.</td>
</tr>
</tbody>
</table>

Under 40 CFR 63, Subpart VWWWW, these facilities are an existing open molding process and are part of an existing affected reinforced plastic composites production source.
(h) Two (2) powder coating booths:

(1) One (1) powder coating booth, identified as EU-09, constructed in 2015, equipped with an integral powder overspray capture filter bank, with a capacity of 14.7 pounds of powder per hour, a product throughput rate of 1,920 pounds of metal parts per hour, and exhausting inside the building. EU-09 consists of one (1) powder coating application gun and a conveyor system.

(2) One (1) powder coating booth, identified as EU-13, approved in 2021 for construction, equipped with an integral powder overspray capture filter bank (CE-3), with a nominal capacity of fourteen and seven hundred thousandths (14.7) pounds of powder per hour, a nominal product throughput rate of 1,920 lbs/hr of metal parts, and exhausting within the building. EU-13 consists of one (1) powder coating application gun and a conveyor system.

(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 Prevention of Significant Deterioration (PSD) [326 IAC 2-2]

Pursuant to Significant Permit Modification No. 049-37453-00018, issued on October 6, 2016 and approved in 2021 for modification, in order to render the requirements of 326 IAC 2-2 (PSD) not applicable, the total VOC emissions from the use of resins, catalysts, gel coats, and clean-up solvents by the following application resin and gel coats units:

Emission units located at 420 Highway 25 North:

(a) Application Unit #1
(b) Application Unit #2
(c) Application Unit #3
(d) Application Unit #4
(e) Application Unit #5
(f) Application Unit #6
(g) Application Unit #7
(h) Application Unit #8
(i) Application Unit #9
(j) Application Unit #10
(k) Application Unit #13
(l) Application Unit #14
(m) Gel coat application, EU-11
(n) Application Unit #15
(o) Application Unit #16
(p) Touch up/production gel coat application operation, EU-12

Emission units located at 1235 East 4th Street:

(q) Application Unit#11
(r) Application Unit#12
(s) Mold release agents

shall not exceed ninety-nine (99) tons per twelve (12) consecutive month period with compliance determined at the end of each month.
Compliance Determination Requirements [326 IAC 2-7-5(1)]

D.1.8 Particulate Control [326 IAC 2-7-6(6)]

(c) In order to ensure that the powder coating booths (EU-09 and EU-13) are exempt from the requirements of 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the respective integral powder overspray capture filter bank for each powder coating booth shall be in operation at all times that the each powder coating booth is in operation.

SECTION E.1 NESHAP

Emissions Unit Description:

(b) One (1) winding area, constructed in 1992, modified in 2001, 2004, 2005, 2006, 2007, 2010, and 2015, and 2021, identified as EU-04, located in Plant 1, exhausting to stacks V4 to V12 which are shared with EU-11, and consist of the following:

(11) One (1) chop/winding facility used to make FRP tanks, identified as Application Unit #15, approved in 2021 for construction, consisting of (1) automated non-atomized mechanical resin application unit (flow coater, flow chopper, and/or fluid impingement device), with a maximum capacity of 101.82 pounds of resin per hour, and two (2) steel mandrels, with a maximum mandrel size of twenty-four (24) inches.

Only one (1) mandrel can be sprayed at a time.

This unit is portable.

Each mandrel exhausts to a duct that is using dry filters voluntarily, which exhaust to the winding area vent consisting of stacks V4 to V12.

(12) One (1) chop/winding facility used to make FRP tanks, identified as Application Unit #16, approved in 2021 for construction, consisting of (1) automated non-atomized mechanical resin application unit (flow coater, flow chopper, and/or fluid impingement device), with a maximum capacity of 101.82 pounds of resin per hour, and two (2) steel mandrels, with a maximum mandrel size of twenty-four (24) inches.

Only one (1) mandrel can be sprayed at a time.

This unit is portable.

Each mandrel exhausts to a duct that is using dry filters voluntarily, which exhaust to the winding area vent consisting of stacks V4 to V12.
Under 40 CFR 63, Subpart WWWW, these facilities are an existing open molding process and are part of an existing affected reinforced plastic composites production source.

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The Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart WWWW (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
5. 40 CFR 63.5796
6. 40 CFR 63.5797
7. 40 CFR 63.5798
8. 40 CFR 63.5799(b)
9. 40 CFR 63.5800
10. 40 CFR 63.5805(a), (b), (e), (f), 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(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)(1)-(3)and (5), (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. Tables 1, 3, 4, 7, 8, 9, 13, 14, and 15 of Subpart WWWW (applicable portions)
25. Appendix A to Subpart WWWW of Part 63—Test Method for Determining Vapor Suppressant Effectiveness

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.

(a) These permit changes include model updates to standard permit language that are applicable to this source. IDEM, OAQ has made model updates to standard permit language in the Section C of the permit to help clarify the intent of these requirements.

Effective June 8, 2019, the requirements of 326 IAC 14-10 (Emission Standards for Asbestos Demolition and Renovation Operations) were amended. Based on the amended rule, Section C.7 - Asbestos Abatement Projects of the permit has been revised as follows:

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]
(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2c).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3d).

... 

(b) Emission units and insignificant activities which do not have emission limitations and/or standards directly regulating them have been removed from Section D.1 Emissions Unit Operation Conditions:

**SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS**

| Emissions Unit Description: |
| ... |

| Insignificant Activities: |
| Insignificant activities located at 1235 East 4th Street: |
| (a) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals measured at 38 degrees C). |
| Insignificant activities common to both plants: |
| (b) Paved and unpaved roads and parking lots with public access. |
| (c) One (1) plumbing department identified as IA-1, applying PVC glues on plastic parts, with maximum capacity of 0.0014 gallon per part and 1.0 part per hour (less than 100 gallons of coating per year), using no control, and exhausting inside the building. |
| (d) Application of oils, greases, lubricants or other nonvolatile material applied as temporary protective coatings |

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

**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 October 27, 2020. Additional information was received on December 17, 2020.

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Source Modification No. 049-43425-00018. The operation of this proposed modification shall be subject to the conditions of the attached proposed Significant Permit Modification No. 049-43448-00018.

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 Andrea M. Smith, 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) 234-8339 or (800) 451-6027, and ask for Andrea M. Smith or (317) 234-8339.

(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/airquality/2356.htm; and the Citizens’ Guide to IDEM on the Internet at: http://www.in.gov/idem/6900.htm.
### Uncontrolled Potential To Emit (tons/yr)

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<th>PM$_{2.5}$</th>
<th>SO$_2$</th>
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<tr>
<td>Natural gas combustion - Main Building</td>
<td>0.08</td>
<td>0.32</td>
<td>0.32</td>
<td>0.03</td>
<td>4.25</td>
<td>0.23</td>
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<td>0.08 Hexane</td>
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<td>Natural gas combustion - Plant 1</td>
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<td>0.11</td>
<td>0.01</td>
<td>1.42</td>
<td>0.88</td>
<td>1.19</td>
<td>0.03</td>
<td>0.03 Hexane</td>
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### Limited Potential To Emit (tons/yr)

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<th>PM$_{2.5}$</th>
<th>SO$_2$</th>
<th>NO$_x$</th>
<th>VOC</th>
<th>CO</th>
<th>HAPs</th>
<th>Single HAP</th>
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<td>99.00 Styrene</td>
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<td>-</td>
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<td>Styrene</td>
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<tr>
<td>Closed Molding Release</td>
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<td>-</td>
<td>-</td>
<td>Styrene</td>
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<tr>
<td>Natural gas combustion - Main Building</td>
<td>0.08</td>
<td>0.32</td>
<td>0.32</td>
<td>0.03</td>
<td>4.25</td>
<td>0.23</td>
<td>3.57</td>
<td>0.08</td>
<td>0.08 Hexane</td>
</tr>
<tr>
<td>Natural gas combustion - Plant 1</td>
<td>0.03</td>
<td>0.11</td>
<td>0.11</td>
<td>0.01</td>
<td>1.42</td>
<td>0.88</td>
<td>1.19</td>
<td>0.03</td>
<td>0.03 Hexane</td>
</tr>
<tr>
<td>Welding and Cutting</td>
<td>0.37</td>
<td>0.37</td>
<td>0.37</td>
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<td>0.03</td>
<td>Chromium</td>
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<tr>
<td>Powder Coating (EU-09)</td>
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<td>0.16</td>
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<td>-</td>
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</tr>
<tr>
<td>Cutting/Grinding Booth (EU-10)</td>
<td>23.84</td>
<td>23.84</td>
<td>23.84</td>
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<td>-</td>
<td>-</td>
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</tr>
<tr>
<td>Cutting and Grinding Booth - EU-07</td>
<td>17.80</td>
<td>17.80</td>
<td>17.80</td>
<td>-</td>
<td>-</td>
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<td>-</td>
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</tr>
<tr>
<td>Natural gas combustion - East 4th Street</td>
<td>0.03</td>
<td>0.12</td>
<td>0.12</td>
<td>0.01</td>
<td>1.62</td>
<td>0.09</td>
<td>1.36</td>
<td>0.03</td>
<td>0.03 Hexane</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td>52.28</td>
<td>42.77</td>
<td>42.77</td>
<td>0.03</td>
<td>5.67</td>
<td>121.37</td>
<td>4.76</td>
<td>118.09</td>
<td>117.92 Styrene</td>
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</tbody>
</table>

---

1. The Applicator Units and Mold Release HAP potential to emit was proportionately adjusted to reflect the 326 IAC 8-1-6 and 326 IAC 2-2 VOC limitations.

The worst case HAP is also the VOC emitted. Since the VOC is limited, the single and total HAPs are also limited for the Application units and Mold Release Units.
### Appendix A: Emissions Calculations
#### SSM/SPM Summary

**Company Name:** Topp Industries, Inc.  
**Address City IN Zip:** 420 Highway 25 North, Rochester, Indiana 46975  
**Operating Permit Number:** T049-37849-00018  
**Significant Source Modification Number:** 049-43425-00018  
**Significant Permit Modification Number:** 049-43448-00018  
**Permit Reviewer:** Andrea M. Smith

<table>
<thead>
<tr>
<th>Process/Emission 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>HAPs</th>
<th>Single HAP</th>
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<tbody>
<tr>
<td>EU-04 - Application Unit #15</td>
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<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>17.36</td>
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<td>17.17</td>
<td>17.17 Styrene</td>
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<tr>
<td>EU-04 - Application Unit #16</td>
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<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>17.36</td>
<td>--</td>
<td>17.17</td>
<td>17.17 Styrene</td>
</tr>
<tr>
<td>Powder Coating Booth EU -13(1)</td>
<td>0.16</td>
<td>0.16</td>
<td>0.16</td>
<td>--</td>
<td>--</td>
<td>17.36</td>
<td>--</td>
<td>--</td>
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</tr>
</tbody>
</table>

**Total**(2)  
- PM: 0.16  
- PM₁₀: 0.16  
- PM₂.₅: 0.16  
- SO₂: 0.00  
- NOₓ: 0.00  
- VOC: 34.71  
- CO: 0.00  
- HAPs: 34.34  
- Single HAP: 34.34 Styrene

---

(1) The control device is integral to the operation of this booth. As a result, the emissions for this process are after control.

(2) Since the modification has potential emissions greater than 25 tons/yr of PM and VOC and greater than 10 tons/yr of any single HAP, a Significant Source Modification is required under 326 IAC 2-7-10.5(g).
Appendix A: Emissions Calculations

VOC Resin #15 - #16

Company Name: Topp Industries, Inc.
Address City IN Zip: 420 Highway 25 North, Rochester, Indiana 46975
Operating Permit Number: T049-37849-00018
Significant Source Modification Number: 049-43425-00018
Significant Permit Modification Number: 049-43448-00018
Permit Reviewer: Andrea M. Smith

Mechanical Non-Atomized Resin Applicators

<table>
<thead>
<tr>
<th>Material</th>
<th>Density (Lb/Gal)</th>
<th>Weight % of VOC</th>
<th>Gal of Mat. (gal/unit)</th>
<th>Maximum Resin Used (lb/hr)</th>
<th>Maximum Resin Used (unit/hr)</th>
<th>CFA Unified Emission Factor (lb/ton)</th>
<th>Potential VOC pounds per hour</th>
<th>Potential Pounds of VOC per day</th>
<th>Potential VOC tons per year</th>
<th>Particulate Potential (ton/yr)</th>
<th>Transfer Efficiency</th>
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</thead>
<tbody>
<tr>
<td>New Application Unit #15</td>
<td>9.17</td>
<td>35.00%</td>
<td>0.109</td>
<td>101.87</td>
<td>101.82</td>
<td>77.00</td>
<td>3.62</td>
<td>94.08</td>
<td>17.17</td>
<td>0.00</td>
<td>100%</td>
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<tr>
<td>New Application Unit #16</td>
<td>9.17</td>
<td>35.00%</td>
<td>0.109</td>
<td>101.87</td>
<td>101.82</td>
<td>77.00</td>
<td>3.62</td>
<td>94.08</td>
<td>17.17</td>
<td>0.00</td>
<td>100%</td>
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Total Emissions 7.84 188.17 34.34 0.00

Catalyst - Norox MEKP-9

<table>
<thead>
<tr>
<th>Material</th>
<th>Density (Lb/Gal)</th>
<th>Weight % of VOC</th>
<th>Gal of Mat. (gal/unit)</th>
<th>Maximum Catalyst Used (lb/hr)</th>
<th>Maximum Catalyst Used (unit/hour)</th>
<th>CFA Unified Emission Factor (lb/ton)</th>
<th>Potential VOC pounds per hour</th>
<th>Potential Pounds of VOC per day</th>
<th>Potential VOC tons per year</th>
<th>Particulate Potential (ton/yr)</th>
<th>Transfer Efficiency</th>
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<tbody>
<tr>
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<td>1.77</td>
<td>0.00089</td>
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<td>0.04</td>
<td>0.19</td>
<td>0.00</td>
<td>100%</td>
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<tr>
<td>New Application Unit #16</td>
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<td>2.40%</td>
<td>0.0019</td>
<td>101.87</td>
<td>1.77</td>
<td>0.00089</td>
<td>N/A</td>
<td>0.04</td>
<td>0.19</td>
<td>0.00</td>
<td>100%</td>
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Total Catalyst Emissions 0.09 2.04 0.37 0.00

Total Potential Emissions 7.93 190.21 34.71 0.00

METHODOLOGY

The resin with the highest styrene content was used in the analysis.

Maximum Resin Used (lb/hr) = Density (lb/gal) * Gal of Mat. (gal/unit) * Maximum (unit/hr)

Ton Processed per hour = Maximum Resin Used (lb/hr) * (1 ton/2000 lb)

Potential VOC pounds per hour (Non-Atomized Units) = Ton processed per hour (ton resin/hr) * CFA Unified Emission Factor (lb styrene/ton resin) / 2000 lb/1 ton

Potential Pounds of VOC per day = Potential VOC pounds per hour * 24

Potential VOC tons per year = Potential Pounds of VOC per day * 365 (days/year) * (1 ton/2000 lb)

Particulate Potential (ton/yr) = (units/hour) * (lb/gal) * (1 - Weight % Volatiles) * (1 - Transfer Efficiency) * (8760 hr/yr) * (1 ton/2000 lb)

Emission factors (in lbs/ton) for styrene and MMA for resin application are from the CFA Unified Emission Factors (October 13, 2009). (American Composite Manufacturers Association)

Per the MSDS, the catalyst contains 2.4% VOC by weight [The rest of the VOC is reacted or incorporated in the final product].

See "Emission Factors for Liquid Organic Peroxide Catalysts used in the Open Molding of Composites" by Robert A. Haberlain, Ph.D., GEP - Engineering Environmental Consulting Services (March 24, 1999) for more information.
Appendix A: Emissions Calculations
HAP Resin #15 - #16

Company Name: Topp Industries, Inc.
Address City IN Zip: 420 Highway 25 North, Rochester, Indiana 46975
Operating Permit Number: T049-37549-00018
Significant Source Modification Number: 049-43425-00018
Significant Permit Modification Number: 049-43448-00018
Permit Reviewer: Andrea M. Smith

<table>
<thead>
<tr>
<th>Material</th>
<th>Density (lb/gal)</th>
<th>Gal of Mat (gal/unit)</th>
<th>Maximum Production (unit/hr)</th>
<th>Weight % Styrene or Emission Factor</th>
<th>Weight % Dimethyl Phthalate or Emission Factor</th>
<th>Styrene Emissions (tons/yr)</th>
<th>Dimethyl Phthalate Emissions (tons/yr)</th>
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<td>Resin Applicators</td>
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<td>17.17</td>
<td>0.00</td>
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<td>New Application Unit #16</td>
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<td>0.109</td>
<td>101.87</td>
<td>77.00</td>
<td>0.00%</td>
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<td>0.02%</td>
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</table>

Methodology:
HAPs emission rate for Solvents (tons/yr) = density (lb/gal) * (gal/unit) * (units/hour) * weight % HAP * (8,760 hrs/yr) * (1 ton/2,000 lb)
HAPs emission rate for Resins (tons/yr) = density (lb/gal) * (gal/unit) * (units/hour) * Emission Factor * (8,760 hrs/yr) * (1 ton/2,000 lb)
HAPs emission rate for Catalyst (tons/yr) = density (lb/gal) * (gal/unit) * (units/hour) * Weight % DMP * DMP Emission Factor * (8,760 hrs/yr) * (1 ton/2,000 lb)

Notes:
Emission Factors are from the Composites Fabricators Association (CFA) emission factors for Open Molding of Composites.
Per the MSDS, the catalyst contains 43% Dimethyl Phthalate. However, only 0.04% by weight of the Dimethyl Phthalate is emitted.
See "Emission Factors for Liquid Organic Peroxide Catalysts used in the Open Molding of Composites" by Robert A. Haberlain, Ph.D., QEP - Engineering Environmental Consulting Services (March 24, 1999) for more information.
Emissions Calculations
Powder Coating EU-09

Company Name: Topp Industries, Inc.
Address City IN Zip: 420 Highway 25 North, Rochester, Indiana 46975
Operating Permit Number: T049-37849-00018
Significant Source Modification Number: 049-43425-00018
Significant Permit Modification Number: 049-43448-00018
Permit Reviewer: Andrea M. Smith

<table>
<thead>
<tr>
<th>Powder paint usage rate (lb/box)</th>
<th>Circuits per box</th>
<th>Circuit length (ft)</th>
<th>Conveyor speed (ft/min)</th>
<th>Coating time (hr/circuit)</th>
<th>Usage Rate (lbs/hr)</th>
<th>Transfer Efficiency</th>
<th>Uncontrolled PTE of PM (lb/hr)</th>
<th>Uncontrolled PTE of PM (ton/yr)</th>
<th>Powder recovery efficiency</th>
<th>Controlled PTE of PM (lb/hr)</th>
<th>Controlled PTE of PM (ton/yr)</th>
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<tbody>
<tr>
<td>55</td>
<td>4</td>
<td>112</td>
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<td>99.50%</td>
<td>0.04</td>
<td>0.16</td>
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Notes:
The powder overspray capture filter bank was determined to be integral. Therefore, after control PTE is used for permit level determination
Assume, PM = PM_{10} = PM_{2.5}

Methodology:
Coating time (hr/circuit) = Circuit length (ft) * (1/ Conveyor speed (ft/min)) * (1 hr/60 min)
Usage Rate (lbs/hr) = Powder Paint/Box (lb) / Circuits/Box / Time/Circuit (hr)
PTE before IC (lbs/hr) = Usage Rate (lbs/hr) * Transfer Efficiency (%)
PTE before IC (tons/yr) = PTE before IC (lbs/hr) * 8,760 hrs / 2,000 lbs
PTE after IC (lbs/hr) = PTE before IC (lbs/hr) * (1 - Powder Recovery %)
PTE after IC (tons/yr) = PTE after IC (lbs/hr) * 8,760 hrs / 2,000 lbs
Controlled PTE (ton/yr) = Uncontrolled PTE (ton/yr) * (1 - Powder recovery efficiency)
PTE (ton/yr) = PTE (lb/hr) * 8760 hrs/yr * 1 ton/2000 lbs
### Appendix A: Emissions Calculations
#### Powder Coating EU-09

**Company Name:** Topp Industries, Inc.  
**Address City IN Zip:** 420 Highway 25 North, Rochester, Indiana 46975  
**Operating Permit Number:** T049-37849-00018  
**Significant Source Modification Number:** 049-43425-00018  
**Significant Permit Modification Number:** 049-43448-00018  
**Permit Reviewer:** Andrea M. Smith

<table>
<thead>
<tr>
<th>Coating</th>
<th>Powder paint usage rate (lb/box)</th>
<th>Circuits per box</th>
<th>Circuit length (ft)</th>
<th>Conveyor speed (ft/speed)</th>
<th>Coating time (hr/circuit)</th>
<th>Usage Rate (lbs/hr)</th>
<th>Transfer Efficiency</th>
<th>Uncontrolled PTE of PM (lb/hr)</th>
<th>Uncontrolled PTE of PM (ton/yr)</th>
<th>Powder recovery efficiency</th>
<th>Controlled PTE of PM (lb/hr)</th>
<th>Controlled PTE of PM (ton/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Argo Data</td>
<td>55</td>
<td>4</td>
<td>112</td>
<td>2</td>
<td>0.93</td>
<td>14.73</td>
<td>50.0%</td>
<td>7.37</td>
<td>32.26</td>
<td>99.50%</td>
<td>0.04</td>
<td>0.16</td>
</tr>
</tbody>
</table>

**Notes:**  
This powder coating booth was relocated in 2020 from the Topp Industries, Inc, facility located at 820 Dewey Street, Argos, IN 46501. The powder overspray capture filter bank was determined to be integral in SPM #049-43448-00018. Therefore, controlled PTE is used for permit level determination. Assume, \( PM = PM_{10} = PM_{2.5} \).  

**Methodology:**  
Usage Rate (lbs/hr) = Powder Paint/Box (lb) / Circuits/Box / Time/Circuit (hr)  
PTE before IC (lbs/hr) = Usage Rate (lbs/hr) * Transfer Efficiency (%)  
PTE before IC (tons/yr) = PTE before IC (lbs/hr) * 8,760 hrs / 2,000 lbs  
PTE after IC (lbs/hr) = PTE before IC (lbs/hr) * (1 - Powder Recovery (%))  
PTE after IC (tons/yr) = PTE after IC (lbs/hr) * 8,760 hrs / 2,000 lbs  
Controlled PTE (ton/yr) = Uncontrolled PTE (ton/yr) * (1 - Powder recovery efficiency))  
PTE (ton/yr) = PTE (lb/hr) * 8760 hrs/yr * 1 ton/2000 lbs
**Appendix A: Emissions Calculations**

**Potential PM, PM<sub>10</sub>, and PM<sub>2.5</sub> Emissions from Cutting/Grinding Stooih (EU-10)**

**Company Name:** Topp Industries, Inc.
**Address City IN Zip:** 420 Highway 25 North, Rochester, Indiana 46975
**Operating Permit Number:** 7049-37549-00018
**Significant Source Modification Number:** 049-43425-00018
**Significant Permit Modification Number:** 049-43448-00018
**Permit Reviewer:** Andrea M. Smith

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Maximum Throughput (tanks/hr)</th>
<th>Total Mass of the FRP removed per tank during cutting and grinding (lbs/tank)</th>
<th>Total Mass of the FRP removed during cutting and grinding (lbs/hr)</th>
<th>% of PM from the total mass of the FRP removed during cutting and grinding</th>
<th>PM Emissions factor (lb/hr)</th>
<th>PM Emissions (tons/yr)</th>
<th>PM&lt;sub&gt;10&lt;/sub&gt; Emissions (tons/yr)</th>
<th>PM&lt;sub&gt;2.5&lt;/sub&gt; Emissions (tons/yr)</th>
<th>Control Efficiency</th>
<th>Controlled PM PTE (tons/year)</th>
<th>Control Eff. PM&lt;sub&gt;10&lt;/sub&gt; PTE (tons/year)</th>
<th>Control Eff. PM&lt;sub&gt;2.5&lt;/sub&gt; PTE (tons/year)</th>
<th>Controlled PM PTE (lbs/hr)</th>
<th>Limited PM/PM&lt;sub&gt;10&lt;/sub&gt;/PM&lt;sub&gt;2.5&lt;/sub&gt; PTE (tons)</th>
<th>Limited PM/PM&lt;sub&gt;10&lt;/sub&gt;/PM&lt;sub&gt;2.5&lt;/sub&gt; PTE (tons/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Grinder (SG-01)</td>
<td>5.4</td>
<td>0.56</td>
<td>3.024</td>
<td>90.00%</td>
<td>2.72</td>
<td>11.92</td>
<td>11.92</td>
<td>11.92</td>
<td>75%</td>
<td>2.98</td>
<td>2.98</td>
<td>2.98</td>
<td>0.68</td>
<td>6.48</td>
<td>1.48</td>
</tr>
<tr>
<td>Grinder (SG-02)</td>
<td>5.4</td>
<td>0.56</td>
<td>3.024</td>
<td>90.00%</td>
<td>2.72</td>
<td>11.92</td>
<td>11.92</td>
<td>11.92</td>
<td>75%</td>
<td>2.98</td>
<td>2.98</td>
<td>2.98</td>
<td>0.68</td>
<td>6.48</td>
<td>1.48</td>
</tr>
<tr>
<td>Total</td>
<td>5.44</td>
<td>23.84</td>
<td>23.84</td>
<td>23.84</td>
<td>5.96</td>
<td>5.96</td>
<td>5.96</td>
<td>5.96</td>
<td>1.36</td>
<td>1.36</td>
<td>1.36</td>
<td>1.36</td>
<td>0.68</td>
<td>6.48</td>
<td>1.48</td>
</tr>
</tbody>
</table>

**Methodology**

- FRP = fiberglass reinforced plastics
- PM = PM<sub>10</sub> = PM<sub>2.5</sub>

Total mass of the FRP removed during cutting and grinding (lbs/tank) is based on the study conducted by the source. Conservatively it is assumed that 90% of the total mass of the FRP removed during cutting and grinding is PM.

PM emission factor (lb/hr) = total mass of the FRP removed during cutting and grinding (lbs/hr) x % of PM from the total mass of the FRP removed

Controlled PM PTE (tons/year) = PM Emissions (tons/yr) x (1 - (Control Efficiency (%) / 100))

Controlled PM PTE (lbs/hr) = Controlled PM PTE (tons/year) x 2000 (lbs/ton) / 8760 (hrs/yr)
Appendix A: Emissions Calculations
Natural Gas Combustion Only - Main Building
MM BTU/HR <100

Company Name: Topp Industries, Inc.
Address City IN Zip: 420 Highway 25 North, Rochester, Indiana 46975
Operating Permit Number: T049-37849-00018
Significant Source Modification Number: 049-43425-00018
Significant Permit Modification Number: 049-43448-00018
Permit Reviewer: Andrea M. Smith

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Emission Factor in lb/MMCF</th>
<th>Potential Throughput</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM*</td>
<td>1.9</td>
<td></td>
</tr>
<tr>
<td>PM10*</td>
<td>7.6</td>
<td></td>
</tr>
<tr>
<td>direct PM2.5*</td>
<td>7.6</td>
<td></td>
</tr>
<tr>
<td>SO2</td>
<td>0.6</td>
<td></td>
</tr>
<tr>
<td>NOx</td>
<td>100</td>
<td></td>
</tr>
<tr>
<td>VOC</td>
<td>5.5</td>
<td></td>
</tr>
<tr>
<td>CO</td>
<td>84</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Emission Factor in lb/MMCF</th>
<th>Potential Emission in tons/yr</th>
</tr>
</thead>
<tbody>
<tr>
<td>Benzene</td>
<td>2.1E-03</td>
<td>8.927E-05</td>
</tr>
<tr>
<td>Dichlorobenzene</td>
<td>1.2E-03</td>
<td>5.101E-05</td>
</tr>
<tr>
<td>Formaldehyde</td>
<td>7.5E-02</td>
<td>3.188E-03</td>
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<tr>
<td>Hexane</td>
<td>1.8E+00</td>
<td>7.652E-02</td>
</tr>
<tr>
<td>Toluene</td>
<td>3.4E-03</td>
<td>1.445E-04</td>
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</tbody>
</table>

**HAPs - Metals**

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Emission Factor in lb/MMcf</th>
<th>Potential Emission in tons/yr</th>
</tr>
</thead>
<tbody>
<tr>
<td>Lead</td>
<td>5.0E-04</td>
<td>2.126E-05</td>
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<tr>
<td>Cadmium</td>
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<tr>
<td>Chromium</td>
<td>1.4E-03</td>
<td>5.952E-05</td>
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<tr>
<td>Manganese</td>
<td>3.8E-04</td>
<td>1.615E-05</td>
</tr>
<tr>
<td>Nickel</td>
<td>2.1E-03</td>
<td>8.927E-05</td>
</tr>
</tbody>
</table>

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

**PM emission factor is filterable PM only. PM10 and PM2.5 emission factors are filterable and condensable PM10 and PM2.5 combined, respectively.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Emission Factor in lb/MMcf</th>
<th>Potential Emission in tons/yr</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total HAPs</td>
<td>0.08</td>
<td></td>
</tr>
<tr>
<td>Single HAP</td>
<td>0.077 Hexane</td>
<td></td>
</tr>
</tbody>
</table>
## Appendix A: Emissions Calculations

### Natural Gas Combustion Only - 2015 Plant 1 Expansion

**MM BTU/HR <100**

**Company Name:** Topp Industries, Inc.  
**Address City IN Zip:** 420 Highway 25 North, Rochester, Indiana 46975  
**Operating Permit Number:** T049-37849-00018  
**Significant Source Modification Number:** 049-43425-00018  
**Significant Permit Modification Number:** 049-43448-00018  
**Permit Reviewer:** Andrea M. Smith

---

### Heat Input Capacity and Potential Throughput

<table>
<thead>
<tr>
<th>MMBtu/hr</th>
<th>mmBtu/hr</th>
<th>mmscf</th>
<th>MMCF/yr</th>
</tr>
</thead>
<tbody>
<tr>
<td>3.30</td>
<td>1020</td>
<td>28.3</td>
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### Pollutant Emissions

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Emission Factor in lb/MMCF</th>
<th>Potential Emission in tons/yr</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM*</td>
<td>1.9</td>
<td>0.03</td>
</tr>
<tr>
<td>PM10*</td>
<td>7.6</td>
<td>0.11</td>
</tr>
<tr>
<td>direct PM2.5*</td>
<td>7.6</td>
<td>0.11</td>
</tr>
<tr>
<td>SO2</td>
<td>0.6</td>
<td>0.01</td>
</tr>
<tr>
<td>NOx</td>
<td>100</td>
<td>1.42</td>
</tr>
<tr>
<td>VOC</td>
<td>5.5</td>
<td>0.08</td>
</tr>
<tr>
<td>CO</td>
<td>84</td>
<td>1.19</td>
</tr>
</tbody>
</table>

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

**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>
</tr>
</thead>
<tbody>
<tr>
<td></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>
</tr>
</tbody>
</table>

| Potential Emission in tons/yr | 2.976E-05 | 1.700E-05 | 1.063E-03 | 2.551E-02 | 4.818E-05 |

### HAPs - Metals

<table>
<thead>
<tr>
<th>Emission Factor in lb/MMcf</th>
<th>Lead</th>
<th>Cadmium</th>
<th>Chromium</th>
<th>Manganese</th>
<th>Nickel</th>
</tr>
</thead>
<tbody>
<tr>
<td></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>
</tbody>
</table>

| Potential Emission in tons/yr | 7.085E-06 | 1.559E-05 | 1.984E-05 | 5.385E-06 | 2.976E-05 |

**Total HAPs =** 0.03  
**Single HAP =** 0.026 Hexane
**Appendix A: Emissions Calculations**

**Natural Gas Combustion Only - East 4th Street Building**

**MM BTU/HR <100**

**Company Name:** Topp Industries, Inc.  
**Address City IN Zip:** 420 Highway 25 North, Rochester, Indiana 46975  
**Operating Permit Number:** T049-37849-00018  
**Significant Source Modification Number:** 049-43425-00018  
**Significant Permit Modification Number:** 049-43448-00018  
**Permit Reviewer:** Andrea M. Smith

<table>
<thead>
<tr>
<th>Heat Input Capacity</th>
<th>HHV</th>
<th>Potential Throughput</th>
</tr>
</thead>
<tbody>
<tr>
<td>MM BTU/hr</td>
<td>mm BTU</td>
<td>MMCF/yr</td>
</tr>
<tr>
<td>3.77</td>
<td>1020</td>
<td>32.4</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Emission Factor in lb/MMCF</th>
<th>Potential Emission in tons/yr</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM*</td>
<td>1.9</td>
<td>0.03</td>
</tr>
<tr>
<td>PM10*</td>
<td>7.6</td>
<td>0.12</td>
</tr>
<tr>
<td>direct PM2.5*</td>
<td>7.6</td>
<td>0.12</td>
</tr>
<tr>
<td>SO2</td>
<td>0.6</td>
<td>0.01</td>
</tr>
<tr>
<td>NOx</td>
<td><strong>100</strong></td>
<td>1.62</td>
</tr>
<tr>
<td>VOC</td>
<td>5.5</td>
<td>0.09</td>
</tr>
<tr>
<td>CO</td>
<td>84</td>
<td>1.36</td>
</tr>
</tbody>
</table>

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

**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>
</tr>
</thead>
<tbody>
<tr>
<td></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>
</tr>
</tbody>
</table>

| Potential Emission in tons/yr | 3.400E-05 | 1.943E-05 | 1.214E-03 | 2.914E-02 | 5.504E-05 |

**HAPs - Metals**

<table>
<thead>
<tr>
<th>Emission Factor in lb/MMcf</th>
<th>Lead</th>
<th>Cadmium</th>
<th>Chromium</th>
<th>Manganese</th>
<th>Nickel</th>
</tr>
</thead>
<tbody>
<tr>
<td></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>
</tbody>
</table>

| Potential Emission in tons/yr | 8.094E-06 | 1.781E-05 | 2.266E-05 | 6.152E-06 | 3.400E-05 |

**Total HAPs = 0.03**

**Single HAP = 0.029 Hexane**
January 25, 2021

Elizabeth Hausmann
Topp Industries, Inc.
420 Highway 25 North
Rochester, IN 46975

Re: Public Notice
Topp Industries, Inc.
Permit Level: Title V-Significant Source
Modification (Minor PSD/EO) &
Title V-Significant Permit Modification
Permit Number: 049-43425-00018
049-43448-00018

Dear Ms. Elizabeth Hausmann:

Enclosed is the Notice of 30-Day Period for Public Comment for your draft air permit.

Our records indicate that you are the contact person for this application. However, if you are not the appropriate person within your company to receive this document, please forward it to the correct person. The Notice of 30-Day Period for Public Comment has also been sent to the OAQ Permits Branch Interested Parties List and, if applicable, your Consultant/Agent and/or Responsible Official/Authorized Individual.

The preliminary findings, including the draft permit, technical support document, emission calculations, and other supporting documents, are available electronically at:

IDEM’s online searchable database: http://www.in.gov/apps/idem/caats/ . Choose Search Option by Permit Number, then enter permit 43425 & 43448

and

IDEM’s Virtual File Cabinet (VFC): http://www.IN.gov/idem. Enter VFC in the search box, then search for permit documents using a variety of criteria, such as Program area, date range, permit #, Agency Interest Number, or Source ID.

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 Fulton County Public Library, 320 West 7th Street in Rochester, IN 46975. 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 draft permit 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 Andrea M. Smith, 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 4-8339 or dial (317) 234-8339.

Sincerely,

Kathy Bourquein

Kathy Bourquein
Permits Branch
Office of Air Quality

Enclosures

PN Applicant Cover Letter access via website 8/10/2020
January 25, 2021
To: Fulton County Public 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: Topp Industries, Inc.
Permit Number: 049-43425-00018 & 049-43448-00018

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

January 25, 2021
Topp Industries, Inc.
049-43425-00018 & 049-43448-00018

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 Joanne Smiddie-Brush with the Air Permits Administration Section at 1-800-451-6027, ext. 3-0185 or via e-mail at JBRUSH@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.

Enclosure
PN AAA Cover Letter 2/28/2020
AFFECTED STATE NOTIFICATION OF PUBLIC COMMENT PERIOD
DRAFT INDIANA AIR PERMIT

January 25, 2021
A 30-day public comment period has been initiated for:

Permit Number: 049-43425-00018 & 049-43448-00018
Applicant Name: Topp Industries, Inc.
Location: Rochester, Fulton 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
**Mail Code 61-53**

<table>
<thead>
<tr>
<th>IDEM Staff</th>
<th>KBOURQUE</th>
</tr>
</thead>
<tbody>
<tr>
<td>Topp Industries Inc 049-43448-00018 &amp; 049-43425-00018 (draft)</td>
<td>January 25, 2021</td>
</tr>
</tbody>
</table>

**Name and address of Sender**

<table>
<thead>
<tr>
<th>Line</th>
<th>Article Number</th>
<th>Name, Address, Street and Post Office Address</th>
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</thead>
<tbody>
<tr>
<td>1</td>
<td></td>
<td>Elizabeth Hausmann  Topp Industries Inc 420 HWY 25 N Rochester IN 46975 (Source CAATS)</td>
</tr>
<tr>
<td>2</td>
<td></td>
<td>Kevin Birchmeier  Topp Industries Inc 420 HWY 25 N Rochester IN 46975 (RO CAATS)</td>
</tr>
<tr>
<td>3</td>
<td></td>
<td>Fulton County Commissioners 1093 E 600 N Rochester IN 46975 (Local Official)</td>
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<td>4</td>
<td></td>
<td>Fulton County Public Library - Rochester Branch 320 W 7th St Rochester IN 46975-1332 (Library)</td>
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<td>5</td>
<td></td>
<td>Fulton County Health Department 125 E 9th Street, Ste 004 Rochester IN 46975-7119 (Health Department)</td>
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<td>6</td>
<td></td>
<td>Rochester City Council and Mayors Office 320 Main St Rochester IN 46975 (Local Official)</td>
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<tr>
<td>7</td>
<td></td>
<td>Jen Seely The Mail-Journal PO Box 188 Milford IN 46542 (Affected Party)</td>
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<td>8</td>
<td></td>
<td>Wesley Dehne The Rochester Sentinel 118 E 8th PO Box 260 Rochester IN 46975 (Affected Party)</td>
</tr>
<tr>
<td>9</td>
<td></td>
<td>Christina Seiler The Rochester Sentinel PO Box 260 Rochester IN 46975 (Affected Party)</td>
</tr>
</tbody>
</table>

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