



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Eric J. Holcomb
Governor

Brian C. Rockensuess
Commissioner

To: Interested Parties

Date: June 27, 2024

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

Source Name: Global Composites, Inc.

Permit Level: Title V – Minor Permit Modification

Permit Number: 039-47712-00493

Source Location: 58190 CR 3 S Elkhart, IN 46517,
57500 CR 3 S Elkhart, IN 46517,
28967 Old Highway 33 Elkhart, IN 46517, and
56807 Elk Park Drive Elkhart, IN 46517

Type of Action Taken: Modification at an existing source

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the matter referenced above.

The final decision is available on the IDEM website at: <http://www.in.gov/apps/idem/caats/>
To view the document, choose Search Option **by Permit Number**, then enter permit 47712. This search will also provide the application received date, **draft permit** public notice start and end date, **proposed permit** EPA review period start and end date, and **final** permit issuance date.

The final decision is also available via IDEM's Virtual File Cabinet (VFC). Please go to: <https://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.

(continues on next page)

If you would like to request a paper copy of the permit document, please contact IDEM's Office of Records Management:

IDEM - Office of Records Management
Indiana Government Center North, Room 1207
100 North Senate Avenue
Indianapolis, IN 46204
Phone: (317) 232-8667
Fax: (317) 233-6647
Email: IDEMFILEROOM@idem.in.gov

Pursuant to IC 13-17-3-4 and 326 IAC 2, this permit modification is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-7-3 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to Indiana Office of Administrative Law Proceedings, 100 N. Senate Avenue Suite N802, Indianapolis, IN 46204, **within eighteen (18) days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Indiana Office of Administrative Law Proceedings (OALP); or
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OALP by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OALP by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of an initial Title V operating permit, permit renewal, or permit modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impracticable to raise such issues, or if the grounds for such objection arose after the comment period.

The EPA requests that you file Title V petitions electronically through the Central Data Exchange. To do so, please go to: <https://cdx.epa.gov/>.

If you tried but you are unable to use the Central Data Exchange to file your petition, the EPA requests that you send your petition and associated attachments via email to: titleVpetitions@epa.gov.

If you have made every effort to electronically submit your petition but are simply unable to successfully do so, please submit a hardcopy of your petition to the following address:

US EPA
Office of Air Quality Planning and Standards
Air Quality Policy Division
Operating Permits Group Leader
109 T.W. Alexander Dr. (C-504-01)
Research Triangle Park, NC 27711

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.



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Eric J. Holcomb
Governor

Brian C. Rockensuess
Commissioner

June 27, 2024

Ms. Teri Schenk
Global Composites, Inc.
58190 CR 3 S
Elkhart, IN 46517

Re: 039-47712-00493
Minor Permit Modification

Dear Ms. Schenk:

Global Composites, Inc. was issued Part 70 Operating Permit Renewal No. T039-45158-00493 on November 23, 2022, for a stationary fiberglass and plastic parts manufacturing source located at 58190 & 57500 County Road 3 South, 28967 Old Hwy 33, and 56807 Elk Park Drive Elkhart, IN 46517.

An application requesting changes to this permit was received on March 6, 2024.

Pursuant to the provisions of 326 IAC 2-7-12, a Minor Permit Modification to this permit is hereby approved as described in the attached Technical Support Document.

Please find attached the entire Part 70 Operating Permit as modified.

The permit references the below listed attachment(s). Since this attachment has been provided in previously issued approvals for this source, IDEM OAQ has not included a copy of this attachment with this modification:

Attachment A: 40 CFR 63, Subpart WWWW, National Emission Standards for Hazardous Air Pollutants for Reinforced Plastic Composites Production

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

Previously issued approvals for this source are also available via IDEM's Virtual File Cabinet (VFC). To access VFC, please go to: <https://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.

Federal rules under Title 40 of United States Code of Federal Regulations may also be found on the U.S. Government Printing Office's Electronic Code of Federal Regulations (eCFR) website, located on the Internet at: http://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title40/40tab_02.tpl.

A copy of the permit is available on the Internet at: <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: <https://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: <https://www.in.gov/idem/airpermit/public-participation/>; and the Citizens' Guide to IDEM on the Internet at: <https://www.in.gov/idem/resources/citizens-guide-to-idem/>.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5.

If you have any questions regarding this matter, please contact Phillip Jackson, 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) 234-0055 or (800) 451-6027, and ask for Phillip Jackson or (317) 234-0055.

Sincerely,



Iryn Calilung, Section Chief
Permits Branch
Office of Air Quality

Attachments: Modified Permit and Technical Support Document

cc: File - Elkhart County
Elkhart County Health Department
U.S. EPA, Region 5
Compliance and Enforcement Branch
IDEM Northern Regional Office



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**Part 70 Operating Permit Renewal
OFFICE OF AIR QUALITY**

**Global Composites, Inc.
58190 & 57500 County Road 3 South,
28967 Old Hwy 33, and
56807 Elk Park Drive
Elkhart, IN 46517**

(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.

Operation Permit No.: T039-45158-00493	
Master Agency Interest ID.: 13698	
Issued by: Original signed by: Iryn Calilung, Section Chief Permits Branch, Office of Air Quality	Issuance Date: November 23, 2022 Expiration Date: November 23, 2027

Minor Permit Modification 039-47712-00493	
Issued by: <i>Madhurima Das for</i> Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: June 27, 2024 Expiration Date: November 23, 2027

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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.4 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 and plastic parts manufacturing source.

Source Address:	58190 County Road 3 South, Elkhart, Indiana 46517 28967 Old Hwy 33, Elkhart, Indiana 46517 56807 Elk Park Drive, Elkhart, Indiana 46517, and 57500 County Road 3 South, Elkhart, Indiana 46517
General Source Phone Number:	(574) 522-9956
SIC Code:	3089 (Plastic Products, Not Elsewhere Classified) 3714 (Motor Vehicle Parts and Accessories)
County Location:	Elkhart
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Operating Permit Program Major Source, under PSD 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 fiberglass and plastic parts manufacturing source consists of five (5) plants:

- (a) Plant 1 is located at 28967 Old Hwy 33, Elkhart, Indiana;
- (b) Plant 2 is located at 28967 Old Hwy 33, Elkhart, Indiana;
- (c) Plant 3 is located at 56807 Elk Park Drive, Elkhart, Indiana;
- (d) Plant 4 is located at 58190 County Road 3 South, Elkhart, Indiana; and
- (e) Plant 6 (Panel Division) is located at 57500 County Road 3 South, Elkhart, Indiana.

Since the five (5) plants are located on adjacent properties, have similar SIC codes, have support relationships, and are owned by one company, they will be considered as one (1) source.

This conclusion was initially determined under CP 039-9601-00493, issued on August 31, 1998.

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:

Plants 1 and 2 - Old Hwy 33

- (a) One (1) metton injection area, identified as MIJB1, constructed in 1987, consisting of one (1) metton injection press (metton revolution press), uncontrolled, exhausting to Stack SV204, and with a maximum capacity of 50 parts per hour.

Permit Reviewer: Mohamed S. Hanafy

- (b) One (1) metton painting area, consisting of one (1) paint mixing area, identified as MPB and one (1) metton post final/final finish area, identified as MFF, constructed in 1987, and later updated to meet OSHA requirements, equipped with HVLP spray equipment and dry filters for particulate control, exhausting to Stack SV207, Stack SV207(a) and Stack SV207(b), and with a maximum capacity of 50 parts per hour.

The metton painting area and metton post final/final finish area being combined into one open area.

- (c) One (1) chop lamination booth, identified as SV101, constructed in 1986, equipped with the following:
 - (i) Two (2) non-atomized application systems, and
 - (ii) Two (2) backup non-atomized application systems,using dry filters for particulate control, exhausting to Stack SV101, and with a maximum capacity of 19 fiberglass parts per hour.

Under NESHAP 40 CFR 63, Subpart WWWW, this booth SV101 is considered an existing open molding process.

- (d) One (1) gel coat booth, identified as SV205, constructed in 1986, equipped with the following:
 - (i) One (1) Magnum portable air assisted airless gel coat application system, and
 - (ii) One (1) backup air assisted airless gel coat application system,Using dry filters for particulate control, exhausting to Stack SV205, and with a maximum capacity of 19 fiberglass parts per hour.

Under NESHAP 40 CFR 63, Subpart WWWW, this booth SV205 is considered an existing open molding process.

- (e) One (1) grinding area, identified as Grind Plt 1, constructed in 1987, equipped with an air wall dust collection system as control equipment and exhausting inside the building, and with a maximum capacity of 200 parts per hour or 340.50 pounds of parts per hour, moving 12.5 parts per hour to CNC Grind Plt 2.

Plant 3 - Elk Park Drive

- (f) One (1) gel coat booth, identified as Booth B, constructed in 1994, equipped with the following:
 - (i) one (1) air assisted airless gel coat application system, and
 - (ii) one (1) backup air assisted airless gel coat application system,using dry filters for particulate control, exhausting to Stack SV301, and with a maximum capacity of 6.25 fiberglass parts per hour.

Under NESHAP 40 CFR 63, Subpart WWWW, Booth B is considered an existing open molding process.

- (g) One (1) lamination booth, identified as Booth A, constructed in 1994, equipped with the following:
 - (i) one (1) non-atomized application system, and
 - (ii) one (1) backup non-atomized application system,using dry filters for particulate control, exhausting to Stack SV302, and with a maximum capacity of 6.25 fiberglass parts per hour.

Under NESHAP 40 CFR 63, Subpart WWWW, Booth A is considered an existing open molding process.

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- (h) One (1) grinding booth, identified as Booth C, constructed in 1994, equipped with an air wall dust collection system for particulate emission control and exhausting inside the building, with a maximum capacity of 6.25 fiberglass parts per hour or 777 pounds of parts per hour.
- (i) Two (2) CNC milling machines, approved in 2024 for construction, and exhausting indoors, as follows:
 - (1) CNC #4, with a maximum processing rate of 560 pounds, using a portable dust collector as particulate control, identified as DC CNC #3; and
 - (2) CNC #5, with a maximum processing rate of 560 pounds, using a portable dust collector as particulate control, identified as DC CNC #4.

Plant 4 - County Road 3 South

- (j) One (1) custom gel coat booth, identified as SV401, originally constructed in 1986 and relocated to Plant 4 in 1998, equipped with the following:
 - (i) two (2) air assisted airless spray guns, and
 - (ii) two (2) backup air assisted airless spray guns, using dry filters for overspray control, exhausting to Stack SV401, and with a maximum capacity of 19 parts per hour.

Under NESHAP 40 CFR 63, Subpart WWWW, SV401 is considered an existing open molding process.
- (k) One (1) custom lamination booth, identified as SV402, originally constructed in 1986 and relocated to Plant 4 in 1998, equipped with the following:
 - (i) four (4) non-atomized application systems, and
 - (ii) two (2) backup non-atomized application systems, using dry filters for overspray control, exhausting to Stack SV402, and with a maximum capacity of 19 fiberglass parts per hour.

Under NESHAP 40 CFR 63, Subpart WWWW, SV402 is considered an existing open molding process.
- (l) One (1) grinding booth, identified as SV403, constructed in 1998, equipped with an air wall dust collection system and exhausting inside the building, with a maximum capacity of 2,179 pounds per hour.
- (m) One (1) woodworking area, constructed in 2012, including one (1) 10.5 inch table saw, exhausting to a 2-bag closed loop dust collection system with no outside exhaust, with a maximum capacity of 250 pounds per hour, used for cutting plywood, plastic board, and foam board cutting operation.

Plant 6 - County Road 3 South

- (n) One (1) panel gelcoat reciprocator machine, identified as SV404, constructed in 1998, equipped with a computerized system allowing for controlled spray application, utilizing one (1) air-assisted spray gun, dry filters for particulate control, exhausting to Stack SV 404, and with a maximum capacity of 5 flat panels per hour.

Under NESHAP 40 CFR 63, Subpart WWWW, SV404 is considered an existing open molding process.
- (o) One (1) panel resin reciprocator machine, identified as SV405, constructed in 1998, with

a maximum capacity of 5 flat panels per hour, and equipped with the following;

- (1) a computerized controlled spray system utilizing one (1) resin reciprocator equipped with fluid impingement or equivalent application systems,
- (2) non-atomized spray application equipment for resin wet out,
- (3) using vacuum bagging for covered cure after roll out on flat panels, and
- (4) dry filters for particulate control and exhausting to Stack SV405.

Under NESHAP 40 CFR 63, Subpart WWWW, SV405 is considered an existing open molding process.

- (p) One (1) sanding/panel prep area, constructed in 1998, approved in 2024 to replace an existing table saw, with a combined maximum capacity of 250 pounds of Lauan wood panels per hour, and consisting of the following:

- (1) One (1) 52" wide belt sander, equipped with an integral 3-bag dust collection system for particulate control, and exhausting inside the building,
- (2) One (1) 3HP table saw, approved in 2024 for construction, equipped with an integral dust collection system for particulate control, and exhausting inside the building, and
- (3) One (1) radial arm saw, equipped with an integral dust collection system for particulate control, and exhausting inside the building.

- (q) One (1) automated lamination reciprocator, identified as P6-001, constructed in 2012, with a maximum capacity of 7 parts per hour, and equipped with the following:

- (1) a computerized controlled spray conveyor system utilizing non-atomized or fluid impingement technology for spray applications,
- (2) one (1) resin wet out station equipped with non-atomized spray application equipment for resin wet-out,
- (3) using vacuum bagging for covered cure after roll out on flat panels, and
- (4) dry filter media for particulate control and exhausting to Stack SVP6-001.

Under NESHAP 40 CFR 63, Subpart WWWW, P6-001 is considered an existing open molding process.

- (r) One (1) automated panel gelcoat reciprocator machine, identified as P6-002, constructed in 2012, with a maximum capacity of 7 parts per hour, and equipped with the following:

- (1) a computerized controlled spray conveyor system,
- (2) three (3) air-assisted airless application systems, and
- (3) dry filter media for particulate control and exhausting to Stack P6-002.

Under NESHAP 40 CFR 63, Subpart WWWW, P6-002 is considered an existing open molding process.

- (s) One (1) automated panel table saw equipped with circular saws, and one (1) grinding operation, constructed in 2012, used for cutting and seam grinding fiberglass reinforced plywood plastic panels and component parts, with a combined maximum rated capacity of 3,600 pounds per hour, equipped with closed-loop dust collection system.

A.4 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, as defined in 326 IAC 2-7-1(21):

- (a) Forty-seven (47) natural gas-fired combustion sources with a total rating of 28.12 million British thermal units per hour:

Emission Unit Description	Construction Date (Year)	Maximum Heat Input Capacity (MMBtu/hr)
One (1) Indirect-Fired Air Make-Up Unit, Plant 1	1998	3.08
One (1) Indirect-Fired Air Make-Up #2, Plant 1	2022	2.65
Seven (7) Direct-Fired Radiant Heaters, Plant 1	1998	0.10, each
One (1) Direct-Fired Radiant Heater, Plant 1	1998	0.125
Five (5) Direct-Fired Radiant Heaters, Plant 2	1998	0.10, each
One (1) Indirect-Fired Air Make-Up Unit, Plant 3	1998	2.16
Two (2) Direct-Fired Radiant Heaters, Plant 3	1998	0.075, each
Three (3) Direct-Fired Radiant Heaters, Plant 3	1998	0.10, each
Two (2) Direct-Fired Radiant Heaters, Plant 3	2022	0.15
One (1) Indirect-Fired Air Make-Up Unit (East Unit), Plant 4	1998	4.32
One (1) Direct-Fired Air Make-Up Unit (West Unit), Plant 4	1998	4.32
Four (4) Direct-Fired Radiant Heaters, Plant 4	1998	0.15, each
Five (5) Direct-Fired Radiant Heaters, Plant 4	1998	0.25, each
Four (4) Direct-Fired Radiant Heaters, Plant 4	2022	0.15, each
One (1) Indirect-Fired Air Make-Up Unit, Plant 6	2012	3.08
One (1) Indirect-Fired Air Make-Up #2, Plant 6	2022	2.50
One (1) Direct-Fired Radiant Heater (A), Plant 6	2012	0.125
One (1) Direct-Fired Radiant Heater (B), Plant 6	2012	0.15
One (1) Direct-Fired Radiant Heater (C), Plant 6	2012	0.175
One (1) Thermo-Cycler Indirect-Fired Building Heater, Plant 6	2012	0.58
Three (3) Direct-Fired Space Heaters (E, F, and G), Plant 6	2012	0.10

- (b) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons, and vessels storing lubricating oil, hydraulic oils, machining oils, and machining fluids.
- (c) Ten (10) resin storage tanks, including the following:
 - (1) One (1) 6,000 gallon resin storage tank, known as Tank 301plt3, constructed in 2004, approved in 2022 to increase its maximum capacity, located at Plant No. 3.
 - (2) One (1) 6,000 gallon resin storage tank, known as Tank 102plt1, constructed in 2004, approved in 2022 to decrease its maximum capacity, located at Plant No. 1.
 - (3) Four (4) fixed-roof, above-ground resin tanks, identified as EM0014, EM0015, EM0016 and EM0017, located at Plant 4, and each with a maximum storage capacity of 6,000 gallons.
 - (4) Three (3) above-ground horizontal bulk storage tanks for storing polyester resin, identified as Tank 1, Tank 2, and Tank 3, constructed in 2012, and each with a maximum storage capacity of 6,000 gallons.

- (5) One (1) above-ground bulk resin storage tank, identified as Plant 1 T2, approved in 2024 for construction, with a maximum capacity of 6,000 gallons, located at Plant No. 1.
- (d) Equipment used exclusively for the following: Filling drums, pails or other packaging containers with lubricating oils, waxes, and greases.
- (e) Application of oils, greases lubricants or other nonvolatile materials applied as temporary protective coatings.
- (f) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (g) Cleaners and solvents characterized as follows:
 - (1) Having a vapor pressure equal to or less than:
 - (i) 2 kiloPascals,;
 - (ii) 15 millimeters of mercury, or
 - (iii) 0.3 pounds per square inch measured at 38°C (100°F); or
 - (2) Having a vapor pressure equal to or less than:
 - (i) 0.7 kiloPascals,
 - (ii) 5 millimeters of mercury, or
 - (iii) 0.1 pounds per square inch measured at 20°C (68°F);
 - (3) The use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (h) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (i) Closed loop heating and cooling systems.
- (j) Infrared cure equipment.
- (k) Solvent recycling systems with batch capacity less than or equal to 100 gallons.
- (l) Any operation using aqueous solutions containing less than 1 percent by weight of VOCs excluding HAPs.
- (m) Water based adhesives that are less than or equal to 5 percent by volume of VOCs excluding HAPs.
- (n) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (o) Process vessel degassing and cleaning to prepare for internal repairs.
- (p) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone.
- (q) Paved and unpaved roads and parking lots with public access.
- (r) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities

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would not be associated with any production process.

- (s) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.
- (t) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (u) On-site fire and emergency response training approved by the department.
- (v) Purge double block and bleed valves.
- (w) Filter or coalescer media changeout.
- (x) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kiloPascals measured at 38°C).
- (y) Mold maintenance area emitting less than 12.5 pounds per day or 2.5 ton per year of any combination of HAPs.
- (z) Two (2) acetone solvent distillation systems, one (1) at Plant 1 and one (1) at Plant 4.
- (aa) Eight (8) steel MIG welders, each using a maximum consumption rate of 3.50 lb/hr, and located in various locations in the five (5) plants.
- (bb) One (1) stick welder, using a maximum consumption rate of 3.50 lb/hr.
- (cc) One (1) steel TIG welder, using a maximum consumption rate of 3.50 lb/hr.
- (dd) Two (2) portable plasma cutters, located in Plant 4 and Plant 6, each with a maximum metal cutting rate of 14 inches per minute and a maximum metal thickness of 0.75 inches.
- (ee) One (1) woodworking area, located at Plant 3, utilized for cutting plywood, plastic board, and foam board, with a maximum process weight rate less than 100 pounds per hour, equipped with a two-bag internal closed loop dust collection system, emitting less than 5 pounds per hour or 25 pounds per day of particulate matter.
- (ff) One (1) panel table saw, located at Plant 6, utilized for fiberglass panel cutting, with a maximum process weight rate of 496 pounds per hour, equipped with dust collection systems with no direct exhaust to the outside environment.
- (gg) Three (3) CNC machines, each with particulate matter emissions less than 5 pounds per hour or 25 pounds per day, located at Plant 3, and consisting of the following:
 - (1) One (1) CNC machine, with a maximum process weight less than 100 pounds of wood, foamcore/foamboard, and/or fiberglass parts/molds per hour, equipped with a dust collection system for particulate control, and exhausting indoors.
 - (2) One (1) CNC 5x10 machine, with a maximum process weight less than 100 pounds of wood, foamcore/foamboard, and/or fiberglass parts/molds per hour, equipped with a dust collector for particulate control, and exhausting indoors.
 - (3) One (1) CNC 5x5 machine, with a maximum process weight less than 100 pounds of wood, foamcore/foamboard, and/or fiberglass parts/molds per hour,

equipped with a dust collector for particulate control, and exhausting indoors.

- (hh) One (1) CNC grinding machine, identified as CNC Grind Plt 2, constructed in 2022, with particulate matter emissions less than 5 pounds per hour or 25 pounds per day, located at Plant 2, with a maximum process weight less than 100 pounds of fiberglass parts/molds per hour, equipped with two (2) dust collection systems for particulate control, and exhausting indoors, this CNC will be doing 12.5 parts per hour which are coming from the Grind Plant 1.
- (ii) One (1) CNC machine, constructed in 2022, with particulate matter emissions less than 5 pounds per hour or 25 pounds per day, located at Plant 4, with a maximum process weight less than 100 pounds of wood per hour, equipped with a dust collection system for particulate control, and exhausting indoors.
- (jj) One (1) Window Adhesive Process, constructed in 2022, located at Plant 2, inserting glass windows into fiber glass windshields, and with a maximum capacity of 30 units per day.
- (kk) Several Diesel storage tanks, located in Plants 6, 4, 3 and Plants 1 & 2, each with a capacity of 58 gallons, used for fuel forklifts and other equipment.

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, 039-45158-00493, 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 April 15 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 5
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) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

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

- (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 039-45158-00493 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

and

United States Environmental Protection Agency, Region 5
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 317-233-8590 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

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

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

C.2 Opacity [326 IAC 5-1]

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

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

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

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

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

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

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

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

C.6 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)][40 CFR 64][326 IAC 3-8]

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

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

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

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

C.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 [40 CFR 64][326 IAC 3-8][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, not subject to CAM, 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]

Pursuant to 326 IAC 2-6-3(a)(1), the Permittee shall submit by July 1 of each year 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:

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

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

C.17 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6][326 IAC 2-2][326 IAC 2-3]

(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) If there is a reasonable possibility (as defined in 326 IAC 2-2-8 (b)(6)(A), 326 IAC 2-2-8 (b)(6)(B), 326 IAC 2-3-2 (l)(6)(A), and/or 326 IAC 2-3-2 (l)(6)(B)) that a "project" (as defined in 326 IAC 2-2-1(oo) and/or 326 IAC 2-3-1(jj)) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a "major modification" (as defined in 326 IAC 2-2-1(dd) and/or 326 IAC 2-3-1(y)) may result in significant emissions increase and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1(pp) and/or 326 IAC 2-3-1(kk)), the Permittee shall comply with following:

(1) Before beginning actual construction of the "project" (as defined in 326 IAC 2-2-1(oo) and/or 326 IAC 2-3-1(jj)) at an existing emissions unit, document and maintain the following records:

- (A) A description of the project.

- (B) Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.
- (C) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:
 - (i) Baseline actual emissions;
 - (ii) Projected actual emissions;
 - (iii) Amount of emissions excluded under section 326 IAC 2-2-1(pp)(2)(A)(iii) and/or 326 IAC 2-3-1 (kk)(2)(A)(iii); and
 - (iv) An explanation for why the amount was excluded, and any netting calculations, if applicable.
- (d) If there is a reasonable possibility (as defined in 326 IAC 2-2-8 (b)(6)(A) and/or 326 IAC 2-3-2 (l)(6)(A)) that a "project" (as defined in 326 IAC 2-2-1(oo) and/or 326 IAC 2-3-1(jj)) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a "major modification" (as defined in 326 IAC 2-2-1(dd) and/or 326 IAC 2-3-1(y)) may result in significant emissions increase and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1(pp) and/or 326 IAC 2-3-1(kk)), the Permittee shall comply with following:
 - (1) Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emissions unit identified in (1)(B) above; and
 - (2) Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.

C.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)][326 IAC 2-1.1-11][326 IAC 2-2][326 IAC 2-3][40 CFR 64][326 IAC 3-8]

- (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.

On and after the date by which the Permittee must use monitoring that meets the requirements of 40 CFR Part 64 and 326 IAC 3-8, the Permittee shall submit CAM reports to the IDEM, OAQ.

A report for monitoring under 40 CFR Part 64 and 326 IAC 3-8 shall include, at a minimum, the information required under paragraph (a) of this condition and the following information, as applicable:

- (1) Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;
- (2) Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and
- (3) A description of the actions taken to implement a QIP during the reporting period as specified in Section C-Response to Excursions or Exceedances. Upon completion of a QIP, the owner or operator shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring.

The Permittee may combine the Quarterly Deviation and Compliance Monitoring Report and a report pursuant to 40 CFR 64 and 326 IAC 3-8.

- (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.
- (e) If the Permittee is required to comply with the recordkeeping provisions of (d) in Section C - General Record Keeping Requirements for any "project" (as defined in 326 IAC 2-2-1 (oo) and/or 326 IAC 2-3-1 (jj)) at an existing emissions unit, and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ:
- (1) The annual emissions, in tons per year, from the project identified in (c)(1) in Section C- General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-2-1 (ww) and/or 326 IAC 2-3-1 (pp), for that regulated NSR pollutant, and
 - (2) The emissions differ from the preconstruction projection as documented and maintained under Section C - General Record Keeping Requirements (c)(1)(C)(ii).
- (f) The report for project at an existing emissions *unit* shall be submitted no later than sixty (60) days after the end of the year and contain the following:
- (1) The name, address, and telephone number of the major stationary source.

- (2) The annual emissions calculated in accordance with (d)(1) and (2) in Section C - General Record Keeping Requirements.
- (3) The emissions calculated under the actual-to-projected actual test stated in 326 IAC 2-2-2(d)(3) and/or 326 IAC 2-3-2(c)(3).
- (4) Any other information that the Permittee wishes to include in this report such as an explanation as to why the emissions differ from the preconstruction projection.

Reports required in this part 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

- (g) The Permittee shall make the information required to be documented and maintained in accordance with (c) in Section C- General Record Keeping Requirements available for review upon a request for inspection by IDEM, OAQ. The general public may request this information from the IDEM, OAQ under 326 IAC 17.1.

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.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Plants 1 and 2 - Old Hwy 33

- (a) One (1) metton injection area, identified as MIJB1, constructed in 1987, consisting of one (1) metton injection press (metton revolution press), uncontrolled and exhausting to Stack SV204, with a maximum capacity of 50 parts per hour per press.
- (b) One (1) metton painting area, consisting of one (1) paint mixing area, identified as MPB and one (1) metton post final/final finish area, identified as MFF, constructed in 1987, and later updated to meet OSHA requirements, equipped with HVLP spray equipment and dry filters for particulate control, exhausting to Stack SV207, Stack SV207(a) and Stack SV207(b), with a maximum capacity of 50 parts per hour.

metton painting area and metton post final/final finish area being combined into one open area.

- (c) One (1) chop lamination booth, identified as SV101, constructed in 1986, equipped with the following:
 - (i) two (2) non-atomized application systems, and
 - (ii) two (2) backup non-atomized application systems,using dry filters for particulate control, exhausting to Stack SV101, and with a maximum capacity of 19 fiberglass parts per hour.

Under NESHAP 40 CFR 63, Subpart WWWW, this booth SV101 is considered an existing open molding process.

- (d) One (1) gel coat booth, identified as SV205, constructed in 1986, equipped with the following:
 - (i) one (1) Magnum portable air assisted airless gel coat application system, and
 - (ii) one (1) backup air assisted airless gel coat application system,using dry filters for particulate control, exhausting to Stack SV205, and with a maximum capacity of 19 fiberglass parts per hour.

Under NESHAP 40 CFR 63, Subpart WWWW, this booth SV205 is considered an existing open molding process.

Plant 3 - Elk Park Drive

- (f) One (1) gel coat booth, identified as Booth B, constructed in 1994, equipped with the following:
 - (i) one (1) air assisted airless gel coat application system, and
 - (ii) one (1) backup air assisted airless gel coat application system,using dry filters for particulate control and exhausting to Stack SV301, and with a maximum capacity of 6.25 fiberglass parts per hour.

Under NESHAP 40 CFR 63, Subpart WWWW, this Booth B is considered an existing open molding process.

- (g) One (1) lamination booth, identified as Booth A, constructed in 1994, equipped with the following:
 - (i) one (1) non-atomized application system, and
 - (ii) one (1) backup non-atomized application system,using dry filters for particulate control and exhausting to Stack SV302, and with a maximum capacity of 6.25 fiberglass parts per hour.

Under NESHAP 40 CFR 63, Subpart WWWW, this Booth A is considered an existing open molding process.

Plant 4 - County Road 3 South

- (j) One (1) custom gel coat booth, identified as SV401, originally constructed in 1986 and relocated to Plant 4 in 1998, equipped with the following:
- (i) two (2) air assisted airless spray guns, and
 - (ii) two (2) backup air assisted airless spray guns,
- using dry filters for overspray control and exhausting to Stack SV401, and with a maximum capacity of 19 parts per hour.

Under NESHAP 40 CFR 63, Subpart WWWW, this booth SV402 is considered an existing open molding process.

- (k) One (1) custom lamination booth, identified as SV402, originally constructed in 1986 and relocated to Plant 4 in 1998, equipped with the following:
- (i) four (4) non-atomized application systems, and
 - (ii) two (2) backup non-atomized application systems,
- using dry filters for overspray control and exhausting to Stack SV402, and with a maximum capacity of 19 fiberglass parts per hour.

Under NESHAP 40 CFR 63, Subpart WWWW, this booth SV402 is considered an existing open molding process.

Plant 6 - County Road 3 South

- (n) One (1) panel gelcoat reciprocator machine, identified as SV404, constructed in 1998, equipped with a computerized system allowing for controlled spray application, utilizing one (1) air-assisted spray gun and dry filters for particulate control and exhausting to Stack SV 404, and with a maximum capacity of 5 flat panels per hour.

Under NESHAP 40 CFR 63, Subpart WWWW, this machine SV404 is considered an existing open molding process.

- (o) One (1) panel resin reciprocator machine, identified as SV405, constructed in 1998, with a maximum capacity of 5 flat panels per hour, and equipped with the following:
- (1) a computerized controlled spray system utilizing one (1) resin reciprocator equipped with fluid impingement or equivalent application systems,
 - (2) non-atomized spray application equipment for resin wet out,
 - (3) using vacuum bagging for covered cure after roll out on flat panels, and
 - (4) dry filters for particulate control and exhausting to Stack SV405.

Under NESHAP 40 CFR 63, Subpart WWWW, this machine SV405 is considered an existing open molding process.

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

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

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 2-2]

Pursuant to CP 039-9601-00493, issued on August 31, 1998 and modified in Significant Permit Modification No. 039-31593-00493, issued on July 10, 2012 and in order to render the

requirements of 326 IAC 2-2 (PSD) not applicable, all operations, including the use of resins, gel coats, mold release agents, coatings, dilution solvents, and cleaning solvents from the following emission units shall be limited such that the emissions of volatile organic compounds (VOC) shall be less than a total of 249 tons per twelve (12) consecutive month period, with compliance determined at the end of each month:

Plants 1 and 2:
One (1) metton injection area (MIJB1)
One (1) metton painting area (MPB)
One (1) metton post final/final finish area (MFF)
One (1) chop lamination booth (SV101)
One (1) gel coat booth (SV205)
Plant 3:
One (1) gel coat booth (Booth B)
One (1) lamination booth (Booth A)
Plant 4:
One (1) custom gel coat booth (SV401)
One (1) custom lamination booth (SV402)
Plant 6:
One (1) gel coat reciprocator machine (SV404)
One (1) resin reciprocator machine (SV405)

Compliance with this limit renders the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable to the "existing source" prior to the 2012 modification.

D.1.2 General Reduction Requirements for New Facilities [326 IAC 8-1-6]

- (a) Pursuant to CP 039-3322-0208, issued on August 24, 1994, and 326 IAC 8-1-6, the metton injection area (MIJB1) shall be a closed molding process.
- (b) Pursuant to T039-7574-00392, issued on March 28, 2002 and the Best Available Control Technology (BACT) requirements under 326 IAC 8-1-6 for VOC emissions from the resin and gel coat application operations at the following:

Plant 1 chop lamination booth (SV101)
Plant 2 gel coat booth (SV205)
Plant 3 gel coat booth (Booth B)
Plant 3 lamination booth (Booth A)
Plant 4 custom gel coat booth (SV401)
Plant 4 custom lamination booth (SV402)

the Permittee shall comply with the following conditions:

- (1) Use of resins and gel coats shall be limited such that the potential to emit (PTE) of VOC for the entire source (Plants 1, 2, 3 and 4, with the exception of the flat panel facility - Plant 6) shall be less than 249 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (2) As a surrogate to volatile organic compounds (VOC) limits, resins and gel coats used shall be limited to the maximum HAP monomer contents listed in the following table, or their equivalent on an emissions mass basis, depending on the application method and products produced:

	HAP Monomer Content, Weight Percent
Resin, Manual or Mechanical Application	
Production-Specialty Products	48*
Production-Noncorrosion Resistant Unfilled	35*
Production-Noncorrosion Resistant Filled (≥35% by weight)	38
Production, Noncorrosion Resistant, Applied to Thermoformed Thermoplastic Sheet	42
Production, Class I, Flame and Smoke Shrinkage Controlled	60*
Tooling	52
Tooling	43
Gel Coat Application	
Production-Pigmented	37
Clear Production	44
Tooling	45
Production-Pigmented, subject to ANSI ^a standards	45
Production-Clear, subject to ANSI ^a standards	50

^a American National Standards Institute.

* Categories that must use mechanical nonatomized application technology or manual application as stated in subsection (c).

Compliance with these HAP monomer content limits shall be demonstrated on a monthly basis. If all of the resins and gel coats used during a month meet the specified HAP monomer content limits, then maintaining records of content and usage as specified under Condition D.1.10 is sufficient for demonstrating compliance with the HAP monomer content limits.

Compliance with the limitations contained in this condition may be demonstrated using monthly emission averaging within each resin or gel coat application category listed in Condition D.1.2(b)(2) by the use of resins or gel coats with HAP monomer contents lower than the limits specified and/or additional emission reduction techniques approved by IDEM, OAQ.

Examples of emission reduction techniques include, but are not limited to, lower monomer content resins and gel coats, vapor suppression, vacuum bagging, or installing a control device. This is allowed to meet the HAP monomer content limits for resins and gel coats within each category, and shall be calculated on an equivalent emissions mass basis monthly to demonstrate compliance as shown below:

For Averaging within a category:

$$\exists Em_A \leq \exists (M_R * E_a)$$

Where:

M_R = Total monthly mass of material within each category
 E_a = Emission factor for each material based on allowable monomer content and allowable application method for each category.
 Em_A = Actual monthly emissions from all materials used within a category based on material specific emission factors, emission reduction techniques and emission controls

Units: mass = tons
 emission factor = lbs of monomer per ton of resin or gel coat
 emissions = lbs of monomer

Cross averaging between resin categories has been approved by IDEM OAQ for Global Composites, Inc. In these instances, the HAP monomer content limits for resins and gel shall be calculated on an equivalent emissions mass basis monthly to demonstrate compliance as shown below:

For Averaging across categories:

$$\sum Em_A \leq \sum (M_R * E_{Ra}) + \sum (M_G * E_{Ga})$$

Where:

M_R = Total monthly mass of resins within each resin category

M_G = Total monthly mass of gel coats within each gel coats category

E_{Ra} = Emission factor for each resin based on allowable monomer content and allowable application method for each resin category.

E_{Ga} = Emission factor for each gel coat based on allowable monomer content for each gel coat category

Em_A = Actual monthly emissions from all resins and gel coats based on material specific emission factors, emission reduction techniques and emission controls

Units: mass = tons

emission factor = lbs of monomer per ton of resin or gel coat

emissions = lbs of monomer

(3) The following categories of materials in Condition D.1.2(b)(2) shall be applied using mechanical nonatomized application technology or manual application:

- (i) Production noncorrosion resistant, unfilled resins from all sources.
- (ii) Production, specialty product resins from all sources.
- (iii) Tooling resins used in the manufacture of watercraft.
- (iv) Production resin used for Class I flame and smoke products.

Nonatomized application equipment means the devices where resin or gel coat material does any of the following:

- (i) Flows from the applicator, in a steady state in an observable coherent flow, without droplets, for a minimum distance of three (3) inches from the applicator orifices such as flow coaters, flow choppers, and fluid impingement equipment.
- (ii) Is mechanically dispensed within or on to a paint roller applicator such as pressure fed rollers.
- (iii) Is deposited on fiber reinforcement moving through a resin or gel coat bath such as resin impregnators.

Nonatomized spray application technology includes flow coaters, flow choppers, pressure-fed rollers, fluid impingement technology, or other non-spray applications of a design and specifications approved by IDEM, OAQ.

Filled resins are resins containing greater than or equal to thirty-five percent (35%) by weight inert filler material, such as silica micro-spheres or micro-balloons, added to alter the density or other physical properties of the resin. The

term "inert filler" does not include pigments.

- (4) Unless specified in Condition D.1.2(b)(3), gel coat application and mechanical application of resins shall be by any of the following spray technologies:
- (i) Nonatomized application technology.
 - (ii) Air-assisted airless.
 - (iii) Airless.
 - (iv) High volume, low pressure (HVLP).
 - (v) Equivalent emission reduction technologies to subdivisions (ii) through (iv).

D.1.3 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

Pursuant to T039-7574-00392, issued March 28, 2002 and in order to render 326 IAC 8-1-6 not applicable, the use of VOC, including coatings, dilution solvents, and cleaning solvents at the following shall be limited to less than a total of twenty-five (25) tons per twelve (12) consecutive month period with compliance determined at the end of each month:

Plants 1 and 2

- (1) one (1) metton painting area (MPB), and
- (2) one (1) metton post final/final finish area (MFF).

Compliance with this limit shall limit the potential to emit VOC from the Plants 1 and 2 metton painting area (MPB) and the metton post final/final finish area (MFF) to less than twenty-five (25) tons per 12 consecutive month period and shall render the requirements of 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities) not applicable.

D.1.4 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d) and in order to render 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable to the "existing source" prior to the 2012 modification, particulate from the following shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications:

Plants 1 and 2:
One (1) metton painting area (MPB)
One (1) metton post final/final finish area (MFF)
One (1) gel coat booth (SV205)
Plant 3:
One (1) gel coat booth (Booth B)
Plant 4:
One (1) custom gel coat booth (SV401)

D.1.5 Operator Training for Reinforced Plastic Composites Fabrication [326 IAC 20-56-2]

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

- (a) Each owner or operator shall train all new and existing personnel, including contract personnel, who are involved in resin and gel coat spraying and applications that could result in excess emissions if performed improperly according to the following schedule:
 - (1) All personnel hired shall be trained within thirty (30) days of hiring.
 - (2) To ensure training goals listed in Condition D.1.5(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 most recent refresher training, whichever is later.
- (d) Records of prior training programs and former personnel are not required to be maintained.

D.1.6 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

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

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

D.1.7 Volatile Organic Compounds (VOC) [326 IAC 8-1-4][326 IAC 8-1-2(a)]

- (a) Compliance with the VOC limits in Conditions D.1.1 and D.1.2 shall be determined based upon the following criteria:
 - (1) Monthly usage by weight, weight percent VOC and monomer content that is HAP, and method of application shall be recorded for each resin, gel coat, mold release agent, coating, dilution solvent and cleaning solvent. Volatile organic

compound emissions shall be calculated by multiplying the usage of each material by the emission factor that is appropriate for the percent volatiles or monomer content, and the method of application, and summing the emissions for all materials. Emission factors shall be obtained from a reference approved by IDEM, OAQ.

- (2) Until such time that new emissions information is available by U.S. EPA in its AP-42 document or other U.S. EPA-approved form, emission factors for resin and gel coat operations shall be taken from the following reference approved by IDEM, OAQ: "Unified Emission Factors for Open Molding of Composites", October 13, 2009, or its updates.
- (3) The emission factors for the Plants 1 and 2 metton injection area (MIJB1) shall be 1.0% of the input volatile organic compounds.
- (4) The emission factors for all other VOC emitting compounds shall be 100% of the input volatile organic compounds.

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

- (b) Compliance with the VOC emission and usage limitations contained in Conditions D.1.1, D.1.2 and D.1.3 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.

D.1.8 Hazardous Air Pollutants (HAP)

Compliance with the HAP monomer content limitations in Condition D.1.2(b) shall be determined using one of the following:

- (a) The manufacturer's certified product data sheet.
- (b) The manufacturer's material safety data sheet.
- (c) Sampling and analysis, using any of the following test methods, as applicable:
 - (1) 40 CFR 60, Method 24, Appendix A (July 1, 1998), shall be used to measure the total volatile HAP content of resins and gel coats. Method 24 may be modified for measuring the volatile HAP content of resins or gel coats to require that the procedure be performed on uncatalyzed resin or gel coat samples.
 - (2) 40 CFR 63, Method 311, Appendix A (July 1, 1998), shall be used to measure HAP content in resins and gel coats by direct injection into a gas chromatograph.
- (d) An alternate method approved by IDEM, OAQ.

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

D.1.9 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the following stacks:

SV101
SV204
SV207
SV207(a)
SV207(b)
SV301
SV302
SV401
SV402

while one or more of the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response. Section C - Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

- (b) Monthly inspections shall be performed of the emissions from the following stacks:

SV101
SV204
SV207
SV207(a)
SV207(b)
SV301
SV302
SV401
SV402

and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps Section C - Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

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

D.1.10 Record Keeping Requirements

- (a) To document the compliance status with Conditions D.1.1, D.1.2 and D.1.3, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC emission limits and usage and HAP monomer content limits established in Conditions D.1.1, D.1.2, and D.1.3. Records necessary to demonstrate compliance shall be available no later than thirty (30) days after the end of each compliance period.

- (1) Monthly usage by weight, percent volatiles, HAP monomer content, method of application and emissions reduction techniques for each resin, gel coat, mold

release agent, coating, dilution solvent and cleaning solvent. Examples of such records include but are not limited to:

- (A) Records shall include purchase orders, invoices, safety data sheets (SDS), manufacturer's certified product data sheet and sampling and analysis necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
- (2) Monthly calculations of the volatile organic compound emissions.
 - (3) Monthly calculations of the HAP monomer content limits.
- (b) To document the compliance status with Condition D.1.9, the Permittee shall maintain a log of weekly overspray observations, and daily and monthly inspections.
 - (c) 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, D.1.2, and D.1.3 shall be submitted using the reporting form located at the end of this permit, or its equivalent, 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 D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Plant 6 - County Road 3 South

- (n) One (1) panel gelcoat reciprocator machine, identified as SV404, constructed in 1998, equipped with a computerized system allowing for controlled spray application, utilizing one (1) air-assisted spray gun, using dry filters for particulate control, exhausting to Stack SV 404, and with a maximum capacity of 5 flat panels per hour.

Under NESHAP 40 CFR 63, Subpart WWWW, this machine SV404 is considered an existing open molding process.

- (o) One (1) panel resin reciprocator machine, identified as SV405, constructed in 1998, with a maximum capacity of 5 flat panels per hour, and equipped with the following;

- (1) a computerized controlled spray system utilizing one (1) resin reciprocator equipped with fluid impingement or equivalent application systems,
- (2) non-atomized spray application equipment for resin wet out,
- (3) using vacuum bagging for covered cure after roll out on flat panels, and
- (4) dry filters for particulate control and exhausting to Stack SV405.

Under NESHAP 40 CFR 63, Subpart WWWW, this machine SV405 is considered an existing open molding process.

- (q) One (1) automated lamination reciprocator, identified as P6-001, constructed in 2012, with a maximum capacity of 7 parts per hour, and equipped with the following:

- (1) a computerized controlled spray conveyor system utilizing non-atomized or fluid impingement technology for spray applications,
- (2) one (1) resin wet out station equipped with non-atomized spray application equipment for resin wet-out,
- (3) using vacuum bagging for covered cure after roll out on flat panels, and
- (4) dry filter media for particulate control and exhausting to Stack SVP6-001.

Under NESHAP 40 CFR 63, Subpart WWWW, this reciprocator P6-001 is considered an existing open molding process.

- (r) One (1) automated panel gelcoat reciprocator machine, identified as P6-002, constructed in 2012, with a maximum capacity of 7 parts per hour, and equipped with the following:

- (1) a computerized controlled spray conveyor system,
- (2) three (3) air-assisted airless application systems, and
- (3) dry filter media for particulate control and exhausting to Stack P6-002.

Under NESHAP 40 CFR 63, Subpart WWWW, this machine P6-002 is considered an existing open molding process.

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

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

D.2.1 Volatile Organic Compounds (VOC) [326 IAC 2-2]

Pursuant to Significant Permit Modification No. 039-31593-00493, issued on July 10, 2012 and in order to render the requirements of 326 IAC 2-2 (PSD) not applicable to the 2012 modification, the use of resins, gel coats, dilution solvents, and cleaning solvents at the following shall be limited to less than 249 tons per twelve (12) consecutive month period, with compliance determined at the end of each month:

Plant 6 (Panel Division)

- (1) automated lamination reciprocator (P6-001), and
- (2) automated panel gelcoat reciprocator machine (P6-002).

Compliance with this limit, in conjunction with insignificant activities permitted in 2012, shall ensure that the emissions increase due to the installation of P6-001 and P6-002 shall remain below 250 tons per year, rendering 326 IAC 2-2 not applicable to the 2012 modification.

D.2.2 General Reduction Requirements for New Facilities [326 IAC 8-1-6]

Pursuant to CP 039-9601-00493 issued on August 31, 1998 and the Best Available Control Technology (BACT) requirements under 326 IAC 8-1-6, operating conditions for the following:

Plant 6:

- (i) gel coat reciprocator flat panel facility (SV404), and
- (ii) resin reciprocator flat panel facility (SV405),

shall be the following:

- (a) Use of resins and gel coats that contain styrene shall be limited such that the potential to emit (PTE) volatile organic HAP from resins and gel coats only shall be less than a total of one hundred (100) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with this limitation satisfies the Best Available Control Technology (BACT) requirements of 326 IAC 8-1-6.

- (b) Resins and gel coats used shall be limited to the maximum HAP monomer contents listed in the following table, or their equivalent on an emissions mass basis, depending on the application method and products produced:

	HAP Monomer Content, Weight Percent
Resin, Manual or Mechanical Application	
Production-Specialty Products	48*
Production-Noncorrosion Resistant Unfilled	35*
Production-Noncorrosion Resistant Filled (≥35% by weight)	38
Production, Noncorrosion Resistant, Applied to Thermoformed Thermoplastic Sheet	42
Production, Class I, Flame and Smoke Shrinkage Controlled	60*
Tooling	52
Tooling	43
Gel Coat Application	
Production-Pigmented	37
Clear Production	44
Tooling	45

	HAP Monomer Content, Weight Percent
Production-Pigmented, subject to ANSI ^a standards	45
Production-Clear, subject to ANSI ^a standards	50

^a American National Standards Institute.

* Categories that must use mechanical nonatomized application technology or manual application as stated in subsection (c).

Compliance with these HAP monomer content limits shall be demonstrated on a monthly basis. If all of the resins and gel coats used during a month meet the specified HAP monomer content limits, then maintaining records of content and usage as specified under Condition D.2.9 is sufficient for demonstrating compliance with the HAP monomer content limits.

Compliance with the limitations contained in this condition may be demonstrated using monthly emission averaging *within* each resin or gel coat application category listed in Condition D.2.2(b) by the use of resins or gel coats with HAP monomer contents lower than the limits specified and/or additional emission reduction techniques approved by IDEM, OAQ.

Examples of emission reduction techniques include, but are not limited to, lower monomer content resins and gel coats, vapor suppression, vacuum bagging, or installing a control device. This is allowed to meet the HAP monomer content limits for resins and gel coats within each category, and shall be calculated on an equivalent emissions mass basis monthly to demonstrate compliance as shown below:

For Averaging within a category:

$$\sum Em_A \leq \sum (M_R * E_a)$$

Where:

M_R = Total monthly mass of material within each category

E_a = Emission factor for each material based on allowable monomer content and allowable application method for each category.

Em_A = Actual monthly emissions from all materials used within a category based on material specific emission factors, emission reduction techniques and emission controls

Units: mass = tons

emission factor = lbs of monomer per ton of resin or gel coat

emissions = lbs of monomer

Cross averaging between resin categories has been approved by IDEM, OAQ for Global Composites. In these instances, the HAP monomer content limits for resins and gel shall be calculated on an equivalent emissions mass basis monthly to demonstrate compliance as shown below:

For Averaging across categories:

$$\sum Em_A \leq \sum (M_R * E_{Ra}) + \sum (M_G * E_{Ga})$$

Where:

M_R = Total monthly mass of resins within each resin category

M_G = Total monthly mass of gel coats within each gel coats category

E_{Ra} = Emission factor for each resin based on allowable monomer content and allowable application method for each resin category.

E_{Ga} = Emission factor for each gel coat based on allowable monomer

content for each gel coat category

$Em_A =$ *Actual monthly emissions from all resins and gel coats based on material specific emission factors, emission reduction techniques and emission controls*

Units: mass = tons
emission factor = lbs of monomer per ton of resin or gel coat
emissions = lbs of monomer

(c) The following categories of materials in Condition D.2.2(b) shall be applied using mechanical nonatomized application technology or manual application:

- (1) Production noncorrosion resistant, unfilled resins from all sources.
- (2) Production, specialty product resins from all sources.
- (3) Tooling resins used in the manufacture of watercraft.
- (4) Production resin used for Class I flame and smoke products.

Nonatomized application equipment means the devices where resin or gel coat material does any of the following:

- (i) Flows from the applicator, in a steady state in an observable coherent flow, without droplets, for a minimum distance of three (3) inches from the applicator orifices such as flow coaters, flow choppers, and fluid impingement equipment.
- (ii) Is mechanically dispensed within or on to a paint roller applicator such as pressure fed rollers.
- (iii) Is deposited on fiber reinforcement moving through a resin or gel coat bath such as resin impregnators.

Nonatomized spray application technology includes flow coaters, flow choppers, pressure-fed rollers, fluid impingement technology, or other non-spray applications of a design and specifications approved by IDEM, OAQ.

Filled resins are resins containing greater than or equal to thirty-five percent (35%) by weight inert filler material, such as silica micro-spheres or micro-balloons, added to alter the density or other physical properties of the resin. The term "inert filler" does not include pigments.

(d) Unless specified in Condition D.2.2(c), gel coat application and mechanical application of resins shall be by any of the following spray technologies:

- (1) Nonatomized application technology.
- (2) Air-assisted airless.
- (3) Airless.
- (4) High volume, low pressure (HVLP).
- (5) Equivalent emission reduction technologies to Conditions D.2.2(d)(1) through D.2.2(d)(4).

- (e) Cleaning operations for resin and gel coat application equipment shall meet the following:
- (1) For routine flushing of resin and gel coat application equipment such as spray guns, flow coaters, brushes, rollers, and squeegees, a cleaning solvent shall contain no HAPs. This emission standard does not apply to solvents used for removing cured resin or gel coat from application equipment.
 - (2) A source must store HAP containing solvents used for removing cured resin or gel coat in containers with covers. The covers must have no visible gaps and must be in place at all times, except when equipment is placed in or removed from the container.
 - (3) Recycled cleaning solvents that contain less than or equal to five percent (5%) HAP by weight are considered to contain no HAP for the purposes of this Condition D.2.2(e).
- (f) The Permittee has demonstrated to the satisfaction of IDEM, OAQ that the following techniques inherent in the design of the flat panel manufacturing operation reduce emissions and can be considered equivalent to meeting the requirements of Conditions D.2.2(c) and D.2.2(d) listed above:
- (1) Overhead mechanized spray reciprocator to apply all gel coats and resins, which minimizes overspray off the mold through proper placement of spray gun stops and spray gun pressure calibration according to guidelines published by IDEM, OAQ. The spray gun type shall be high volume low pressure (HVLP) or the equivalent.
 - (2) Placement of wood panels and minimal period of roll-out immediately after the last resin application.

Hence, the use of the techniques listed above is hereby approved by IDEM, OAQ as alternatives to meeting the requirements of Conditions D.2.2(c) and D.2.2(d) provided the techniques are employed from the startup of operation. All other conditions stated in this permit remain in effect.

D.2.3 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d) and in order to render 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable to the "existing source" prior to the 2012 modification, particulate from the following shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications:

Plant 6

- (1) One (1) gel coat reciprocator flat panel facility (SV404), and
- (2) One (1) resin reciprocator flat panel facility (SV405).

D.2.4 Operator Training for Reinforced Plastic Composites Fabrication [326 IAC 20-56-2]

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

- (a) Each owner or operator shall train all new and existing personnel, including contract personnel, who are involved in resin and gel coat spraying and applications that could result in excess emissions if performed improperly according to the following schedule:
 - (1) All personnel hired shall be trained within thirty (30) days of hiring.

- (2) To ensure training goals listed in Condition D.2.4(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 most recent refresher training, whichever is later.
- (d) Records of prior training programs and former personnel are not required to be maintained.

D.2.5 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

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

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

D.2.6 Volatile Organic Compounds (VOC) [326 IAC 8-1-4][326 IAC 8-1-2(a)]

- (a) Compliance with the VOC limits in Conditions D.2.1 and D.2.2 shall be determined based upon the following criteria:
- (1) Monthly usage by weight, weight percent VOC and monomer content that is HAP, method of application, and other emission reduction techniques used for each gel coat, resin, dilution solvent, and cleaning solvent shall be recorded. VOC and Volatile organic HAP emissions shall be calculated by multiplying the usage of each material by the emission factor that is appropriate for the monomer content, method of application, and other emission reduction techniques used for each material, and summing the emissions for all materials. Emission factors shall be obtained from the reference approved by IDEM, OAQ.

- (2) Until such time that new emissions information is available by U.S. EPA in its AP-42 document or other U.S. EPA-approved form, emission factors for resin and gel coat operations shall be taken from the following reference approved by IDEM, OAQ: "Unified Emission Factors for Open Molding of Composites", October 13, 2009, or its updates.
- (3) The emission factors for all other VOC emitting compounds shall be 100% of the input volatile organic compounds.

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

- (b) Compliance with the VOC emission and usage limitations contained in Conditions D.2.1, and D.2.2 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.

D.2.7 Hazardous Air Pollutants (HAP)

Compliance with the HAP monomer content limitations in Condition D.2.2 shall be determined using one of the following:

- (a) The manufacturer's certified product data sheet.
- (b) The manufacturer's material safety data sheet.
- (c) Sampling and analysis, using any of the following test methods, as applicable:
 - (1) 40 CFR 60, Method 24, Appendix A (July 1, 1998), shall be used to measure the total volatile HAP content of resins and gel coats. Method 24 may be modified for measuring the volatile HAP content of resins or gel coats to require that the procedure be performed on uncatalyzed resin or gel coat samples.
 - (2) 40 CFR 63, Method 311, Appendix A (July 1, 1998), shall be used to measure HAP content in resins and gel coats by direct injection into a gas chromatograph.
- (d) An alternate method approved by IDEM, OAQ.

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

D.2.8 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the following stacks while one or more of the booths are in operation:

SV404
SV405
SVP6-001
SVP6-002

If a condition exists which should result in a response step, the Permittee shall take reasonable response. Section C - Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this

condition. Failure to take response steps shall be considered a deviation from this permit.

- (b) Monthly inspections shall be performed of the emissions from the following stacks and the presence of overspray on the rooftops and the nearby ground:

SV404
SV405
SVP6-001
SVP6-002

When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps Section C - Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

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

D.2.9 Record Keeping Requirements

- (a) To document the compliance status with Conditions D.2.1 and D.2.2, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC emission limits and usage and HAP monomer content limits established in Conditions D.2.1 and D.2.2. Records necessary to demonstrate compliance shall be available no later than thirty (30) days after the end of each compliance period.
- (1) Monthly usage by weight, percent volatiles, HAP monomer content, method of application and emissions reduction techniques for each resin, gel coat, coating, dilution solvent and cleaning solvent. Examples of such records include but are not limited to:
- (A) Records shall include purchase orders, invoices, safety data sheets (SDS), manufacturer's certified product data sheet and sampling and analysis necessary to verify the type and amount used.
- (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
- (2) Monthly calculations of the volatile organic compound emissions.
- (3) Monthly calculations of the HAP monomer content limits.
- (b) To document the compliance status with Condition D.2.8, the Permittee shall maintain a log of weekly overspray observations, and daily and monthly inspections.
- (c) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

D.2.10 Reporting Requirements

A quarterly summary of the information to document the compliance status with Conditions D.2.1, and D.2.2 shall be submitted using the reporting form located at the end of this permit, or its equivalent, 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 D.3 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Plants 1 and 2 - Old Hwy 33

- (e) One (1) grinding area, identified as Grind Plt 1, constructed in 1987, equipped with an air wall dust collection system as control equipment and exhausting inside the building, and with a maximum capacity of 200 parts per hour or 340.50 pounds of parts per hour, moving 12.5 parts per hour to CNC Grind Plt 2.

Plant 3 - Elk Park Drive

- (h) One (1) grinding booth, identified as Booth C, constructed in 1994, equipped with an air wall dust collection system for particulate emission control and exhausting inside the building, and with a maximum capacity of 6.25 fiberglass parts per hour or 777 pounds of parts per hour.
- (i) Two (2) CNC milling machines, approved in 2024 for construction, and exhausting indoors, as follows:
 - (1) CNC #4, with a maximum processing rate of 560 pounds, using a portable dust collector as particulate control, identified as DC CNC #3; and
 - (2) CNC #5, with a maximum processing rate of 560 pounds, using a portable dust collector as particulate control, identified as DC CNC #4.

Plant 4 - County Road 3 South

- (l) One (1) grinding booth, identified as SV403, constructed in 1998, equipped with an air wall dust collection system and exhausting inside the building, and with a maximum capacity of 2,179 pounds per hour.
- (m) One (1) woodworking area, constructed in 2012, including one (1) 10.5 inch table saw, exhausting to a 2-bag closed loop dust collection system with no outside exhaust, with a maximum capacity of 250 pounds per hour, and used for cutting plywood, plastic board, and foam board cutting operation.

Plant 6 - County Road 3 South

- (p) One (1) sanding/panel prep area, constructed in 1998, approved in 2024 to replace an existing saw, with a combined maximum capacity of 250 pounds of Lauan wood panels per hour, and consisting of the following:
 - (1) One (1) 52" wide belt sander, equipped with an integral 3-bag dust collection system for particulate control, and exhausting inside the building,
 - (2) One (1) 3HP table saw, approved in 2024 for construction, equipped with an integral dust collection system for particulate control, and exhausting inside the building, and
 - (3) One (1) radial arm saw, equipped with an integral dust collection system for particulate control, and exhausting inside the building.
- (s) One (1) automated panel table saw equipped with circular saws, and one (1) grinding operation, constructed in 2012, used for cutting and seam grinding fiberglass reinforced plywood plastic panels and component parts, with a combined maximum rated capacity of

3,600 pounds per hour, and equipped with a closed-loop dust collection system.

Insignificant Activities:

- (ee) One (1) woodworking area, located at Plant 3, utilized for cutting plywood, plastic board, and foam board, with a maximum process weight rate less than 100 pounds per hour, equipped with a two bag internal closed loop dust collection system, and emitting less than 5 pounds per hour or 25 pounds per day of particulate matter.
- (ff) One (1) panel table saw, located at Plant 6, utilized for fiberglass panel cutting, with a maximum process weight rate of 496 pounds per hour, and equipped with Grizzly dust collection systems with no direct exhaust to the outside environment.
- (gg) Three (3) CNC machines, each with particulate matter emissions less than 5 pounds per hour or 25 pounds per day, located at Plant 3, and consisting of the following:
 - (1) One (1) CNC machine, with a maximum process weight less than 100 pounds of wood, foamcore/foamboard, and/or fiberglass parts/molds per hour, equipped with a dust collection system for particulate control, and exhausting indoors.
 - (2) One (1) CNC 5x10 machine, with a maximum process weight less than 100 pounds of wood, foamcore/foamboard, and/or fiberglass parts/molds per hour, equipped with a dust collector for particulate control, and exhausting indoors.
 - (3) One (1) CNC 5x5 machine, with a maximum process weight less than 100 pounds of wood, foamcore/foamboard, and/or fiberglass parts/molds per hour, equipped with a dust collector for particulate control, and exhausting indoors.
- (hh) One (1) CNC grinding machine, identified as CNC Grind Plt 2, constructed in 2022, with particulate matter emissions less than 5 pounds per hour or 25 pounds per day, located at Plant 2, with a maximum process weight less than 100 pounds of fiberglass parts/molds per hour, equipped with two (2) dust collection systems for particulate control, and exhausting indoors, this CNC will be doing 12.5 parts per hour which are coming from the Grind Plant 1.
- (ii) One (1) CNC machine, constructed in 2022, with particulate matter emissions less than 5 pounds per hour or 25 pounds per day, located at Plant 4, with a maximum process weight less than 100 pounds of wood per hour, equipped with a dust collection system for particulate control, and exhausting indoors.

(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.3.1 Particulate [326 IAC 6-3-2]

- (a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the facilities listed in the table below shall be as follows:

Emission Unit	Control Device	Process Weight Rate (tons/hr)	Emission Limit (lbs PM/hr)
Plants 1 and 2 metton grinding booth (Grind Plt 1)	Air Wall Dust Collection System	0.17	1.25

Emission Unit	Control Device	Process Weight Rate (tons/hr)	Emission Limit (lbs PM/hr)
Plant 3 grinding booth (Booth C)	Air Wall Dust Collection System	0.39	2.18
Plant 3 CNC Milling (CNC #4)	Portable Closed-loop dust collection system	0.28	1.74
Plant 3 CNC Milling (CNC #5)	Portable Closed-loop dust collection system	0.28	1.74
Plant 4 grinding booth (SV403)	Air Wall Dust Collection System	1.09	4.34
Plant 4 woodworking area	Two (2) bag closed loop dust collection system	0.13	1.02
Plant 6 automated panel table saw and grinding operation	Closed-loop dust collection system	1.80	6.08

The pound per hour limitations were calculated with the following equation:

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

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

- (b) Pursuant to 326 IAC 6-3-2(e)(2), the allowable rate of particulate emissions from the insignificant woodworking area shall not exceed 0.551 pounds per hour.
- (c) Pursuant to 326 IAC 6-3-2(e)(2), the allowable rate of particulate emissions from the following five (5) CNC cutting machines shall each not exceed 0.551 pounds per hour:
 - (i) Three (3) CNC cutting machines in Plant 3,
 - (ii) One (1) CNC Grind Plt 2, and
 - (iii) One (1) CNC machine in Plant 4.

D.3.2 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

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

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

D.3.3 Particulate Control

- (a) In order to comply with Condition D.3.1, the particulate control equipment shall be in operation and control emissions from the following at all times that the facilities are in operation:

Emission Unit	Control Device
Plants 1 and 2 metton grinding booth (Grind Plt 1)	Air Wall Dust Collection System
Plant 4 grinding booth (SV403)	Air Wall Dust Collection System
Plant 4 woodworking area	Two (2) bag closed loop dust collection system
Plant 6 automated panel table saw and grinding operation	Closed-loop dust collection system

- (b) In order to assure the requirements of 326 IAC 6-3-2 are not applicable, the integral particulate control equipment shall be in operation and control emissions from the Plant 6 sanding/panel prep area process at all times that the process is in operation.

SECTION D.4 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Insignificant Activities:

- (a) Forty-seven (47) natural gas-fired combustion sources with a total rating of 28.12 million British thermal units per hour:
 ...

Emission Unit Description	Construction Date (Year)	Maximum Heat Input Capacity (MMBtu/hr)
One (1) Indirect-Fired Air Make-Up Unit, Plant 1	1998	3.08
One (1) Indirect-Fired Air Make-Up #2, Plant 1	2022	2.65
One (1) Indirect-Fired Air Make-Up Unit, Plant 3	1998	2.16
One (1) Indirect-Fired Air Make-Up Unit (East Unit), Plant 4	1998	4.32
One (1) Indirect-Fired Air Make-Up Unit, Plant 6	2012	3.08
One (1) Indirect-Fired Air Make-Up #2, Plant 6	2022	2.50
One (1) Thermo-Cycler Indirect-Fired Building Heater, Plant 6	2012	0.58

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

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

D.4.1 Particulate Emissions [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), the PM emissions from the following units shall be limited to Pt pounds per MMBtu heat input, as follows:

Emission Unit	Pt (lb/MMBtu)
One (1) Indirect-Fired Air Make-Up Unit, Plant 1	0.564
One (1) Indirect-Fired Air Make-Up #2, Plant 1	0.564
One (1) Indirect-Fired Air Make-Up Unit, Plant 3	0.564
One (1) Indirect-Fired Air Make-Up Unit (East Unit), Plant 4	0.564
One (1) Indirect-Fired Air Make-Up Unit, Plant 6	0.564
One (1) Indirect-Fired Air Make-Up #2, Plant 6	0.564
One (1) Thermo-Cycler Indirect-Fired Building Heater, Plant 6	0.557

SECTION E.1

NESHAP

Emissions Unit Description:

Plants 1 and 2 - Old Hwy 33

- (d) One (1) chop lamination booth, identified as SV101, constructed in 1986, equipped with the following:
- (i) two (2) non-atomized application systems, and
 - (ii) two (2) backup non-atomized application systems,
- using dry filters for particulate control, exhausting to Stack SV101, and with a maximum capacity of 19 fiberglass parts per hour.

Under NESHAP 40 CFR 63, Subpart WWWW, this booth SV101 is considered an existing open molding process.

- (e) One (1) gel coat booth, identified as SV205, constructed in 1986, equipped with the following:
- (i) one (1) Magnum portable air assisted airless gel coat application system, and
 - (ii) one (1) backup air assisted airless gel coat application system,
- using dry filters for particulate control, exhausting to Stack SV205, and with a maximum capacity of 19 fiberglass parts per hour.

Under NESHAP 40 CFR 63, Subpart WWWW, this booth SV205 is considered an existing open molding process.

Plant 3 - Elk Park Drive

- (g) One (1) gel coat booth, identified as Booth B, constructed in 1994, equipped with the following:
- (i) one (1) air assisted airless gel coat application system, and
 - (ii) one (1) backup air assisted airless gel coat application system,
- using dry filters for particulate control and exhausting to Stack SV301, with a maximum capacity of 6.25 fiberglass parts per hour.

Under NESHAP 40 CFR 63, Subpart WWWW, this Booth B is considered an existing open molding process.

- (h) One (1) lamination booth, identified as Booth A, constructed in 1994, equipped with the following:
- (i) one (1) non-atomized flow coat application system, and
 - (ii) one (1) backup non-atomized flow coat application system,
- using dry filters for particulate control and exhausting to Stack SV302, and with a maximum capacity of 6.25 fiberglass parts per hour.

Under NESHAP 40 CFR 63, Subpart WWWW, this Booth A is considered an existing open molding process.

Plant 4 - County Road 3 South

- (k) One (1) custom gel coat booth, identified as SV401, originally constructed in 1986 and relocated to Plant 4 in 1998, equipped with the following:
- (i) two (2) air assisted airless spray guns, and
 - (ii) two (2) backup air assisted airless spray guns,
- using dry filters for overspray control and exhausting to Stack SV401, and with a maximum capacity of 19 parts per hour.

Under NESHAP 40 CFR 63, Subpart WWWW, this booth SV402 is considered an existing open molding process.

- (l) One (1) custom lamination booth, identified as SV402, originally constructed in 1986 and relocated to Plant 4 in 1998, equipped with the following:
- (i) four (4) non-atomized application systems, and
 - (ii) two (2) backup non-atomized application systems,
- using dry filters for overspray control and exhausting to Stack SV402, and with a maximum capacity of 19 fiberglass parts per hour.

Under NESHAP 40 CFR 63, Subpart WWWW, this booth SV402 is considered an existing open molding process.

Plant 6 - County Road 3 South

- (n) One (1) panel gelcoat reciprocator machine, identified as SV404, constructed in 1998, equipped with a computerized system allowing for controlled spray application, utilizing one (1) air-assisted spray gun and dry filters for particulate control and exhausting to Stack SV 404, and with a maximum capacity of 5 flat panels per hour.

Under NESHAP 40 CFR 63, Subpart WWWW, this machine SV404 is considered an existing open molding process.

- (o) One (1) panel resin reciprocator machine, identified as SV405, constructed in 1998, with a maximum capacity of 5 flat panels per hour, and equipped with the following;
- (1) a computerized controlled spray system utilizing one (1) resin reciprocator equipped with fluid impingement or equivalent application systems,
 - (2) non-atomized spray application equipment for resin wet out,
 - (3) using vacuum bagging for covered cure after roll out on flat panels, and
 - (4) dry filters for particulate control and exhausting to Stack SV405.

Under NESHAP 40 CFR 63, Subpart WWWW, this machine SV405 is considered an existing open molding process.

- (q) One (1) automated lamination reciprocator, identified as P6-001, constructed in 2012, with a maximum capacity of 7 parts per hour, and equipped with the following:
- (1) a computerized controlled spray conveyor system utilizing non-atomized or fluid impingement technology for spray applications,
 - (2) one (1) resin wet out station equipped with non-atomized spray application equipment for resin wet-out,
 - (3) using vacuum bagging for covered cure after roll out on flat panels, and
 - (4) dry filter media for particulate control and exhausting to Stack SVP6-001.

Under NESHAP 40 CFR 63, Subpart WWWW, this reciprocator P6-001 is considered an existing open molding process.

(r) One (1) automated panel gelcoat reciprocator machine, identified as P6-002, constructed in 2012, with a maximum capacity of 7 parts per hour, and equipped with the following:

- (1) a computerized controlled spray conveyor system,
- (2) three (3) air-assisted airless application systems, and
- (3) dry filter media for particulate control and exhausting to Stack P6-002.

Under NESHAP 40 CFR 63, Subpart WWWW, this machine P6-002 is considered an existing open molding process.

(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)]

E.1.1 General Provisions Relating to National Emission Standards for Hazardous Air Pollutants under 40 CFR Part 63 [326 IAC 20-1][40 CFR Part 63, Subpart A]

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

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

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

E.1.2 Reinforced Plastic Composites Production NESHAP [40 CFR Part 63, Subpart WWWW [326 IAC 20-56]

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 (a), (b) and (c)
- (4) 40 CFR 63.5795 (a)(1) and (2), (b)
- (5) 40 CFR 63.5796
- (6) 40 CFR 63.5797 (a), (b) and (c)
- (7) 40 CFR 63.5798 (a) and (b)
- (8) 40 CFR 63.5800
- (9) 40 CFR 63.5805 (a)(1) and (2), (b) and (g)
- (10) 40 CFR 63.5810
- (11) 40 CFR 63.5835 (a) and (c)
- (12) 40 CFR 63.5840
- (13) 40 CFR 63.5860 (a)
- (14) 40 CFR 63.5895 (c) and (d)
- (15) 40 CFR 63.5900 (a) (2), (3), and (4), (b) and (c)
- (16) 40 CFR 63.5905 (a) and (b)

Permit Reviewer: Mohamed S. Hanafy

- (17) 40 CFR 63.5910 (a), (b), (c)(1), (2), (3) and (5), (d), (g), (h) and (i)
- (18) 40 CFR 63.5915 (a), (c) and (d)
- (19) 40 CFR 63.5920
- (20) 40 CFR 63.5925
- (21) 40 CFR 63.5930
- (22) 40 CFR 63.5935
- (23) Tables 1 through 4, 7 through 9, 13 and 14

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Global Composites, Inc.
Source Address: 58190 County Road 3 South, 28967 Old Hwy 33, 56807 Elk Park Drive, and
57500 County Road 3 South, Elkhart, Indiana 46517
Part 70 Permit No.: 039-45158-00493

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:

Email Address:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
Phone: (317) 233-0178
Fax: (317) 233-6865**

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: Global Composites, Inc.
Source Address: 58190 County Road 3 South, 28967 Old Hwy 33, 56807 Elk Park Drive, and
57500 County Road 3 South, Elkhart, IN 46517
Part 70 Permit No.: 039-45158-00493

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

Page 2 of 2

Date/Time Emergency started:		
Date/Time Emergency was corrected:		
Was the facility being properly operated at the time of the emergency?	Y	N
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , 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: Global Composites, Inc.
 Source Address: 58190 County Road 3 South, 28967 Old Hwy 33, 56807 Elk Park Drive, and
 57500 County Road 3 South, Elkhart, Indiana 46517
 Part 70 Permit No.: 039-45158-00493

Facility: Plants 1 and 2

- (1) One (1) metton injection area (MIJB1);
- (2) One (1) metton painting area (MPB);
- (3) One (1) metton post final/final finish area (MFF);
- (4) One (1) chop lamination booth (SV101);
- (5) One (1) gel coat booth (SV205);

Plant 3

- (1) One (1) gel coat booth (Booth B);
- (2) One (1) lamination booth (Booth A);

Plant 4

- (1) One (1) custom gel coat booth (SV401);
- (2) One (1) custom lamination booth (SV402);

Plant 6

- (1) One (1) gel coat reciprocator machine (SV404); and
- (2) One (1) resin reciprocator machine (SV405).

Parameter: VOC emissions
 Limit: Less than a total of 249 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. (Condition D.1.1)

QUARTER: _____ YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	(VOC) (Tons)	(VOC) (Tons)	(VOC) (Tons)
	This Month	Previous 11 Months	12 Month Total

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

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY COMPLIANCE AND ENFORCEMENT BRANCH

Part 70 Quarterly Report

Source Name: Global Composites, Inc.
Source Address: 58190 County Road 3 South, 28967 Old Hwy 33, 56807 Elk Park Drive, and
57500 County Road 3 South, Elkhart, IN 46517
Part 70 Permit No.: T039-45158-00493
Facility: (i) Plant 1 chop lamination booth (SV101),
(ii) Plant 2 gel coat booth (SV205),
(iii) Plant 3 gel coat booth (Booth B),
(iv) Plant 3 lamination booth (Booth A),
(v) Plant 4 custom gel coat booth (SV401) and
(vi) Plant 4 custom lamination booth (SV402).
Parameter: VOC emissions
Limit: Less than a total of 249 tons per twelve (12) consecutive month period, with
compliance determined at the end of each month. (Condition D.1.2(b))

QUARTER : _____ YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month (VOC) (tons)	Previous 11 Months (VOC) (tons)	12 Month Total (VOC) (tons)

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

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY COMPLIANCE AND ENFORCEMENT BRANCH

Part 70 Quarterly Report

Source Name: Global Composites, Inc.
 Source Address: 58190 County Road 3 South, 28967 Old Hwy 33, 56807 Elk Park Drive, and
 57500 County Road 3 South, Elkhart, IN 46517
 Part 70 Permit No.: T039-45158-00493
 Facility: Plant 2:
 (1) metton painting area (MPB), and
 (2) metton post final/final finish area (MFF)
 Parameter: VOC usage
 Limit: Less than a total of twenty-five (25) tons per twelve (12) consecutive month
 period with compliance determined at the end of each month. (Condition D.1.3)

QUARTER : _____ YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month (VOC) (tons)	Previous 11 Months (VOC) (tons)	12 Month Total (VOC) (tons)

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

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY COMPLIANCE AND ENFORCEMENT BRANCH

Part 70 Quarterly Report

Source Name: Global Composites, Inc.
Source Address: 58190 County Road 3 South, 28967 Old Hwy 33, 56807 Elk Park Drive, and
57500 County Road 3 South, Elkhart, IN 46517
Part 70 Permit No.: T039-45158-00493
Facility: Plant 6 (Panel Division)
(1) automated lamination reciprocator (P6-001), and
(2) automated panel gelcoat reciprocator machine (P6-002).
Parameter: VOC emissions
Limit: Less than a total of 249 tons per twelve (12) consecutive month period, with
compliance determined at the end of each month. (Condition D.2.1)

QUARTER : _____ YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.
Deviation has been reported on:

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY COMPLIANCE AND ENFORCEMENT BRANCH

Part 70 Quarterly Report

Source Name: Global Composites, Inc.
Source Address: 58190 County Road 3 South, 28967 Old Hwy 33, 56807 Elk Park Drive, and
57500 County Road 3 South, Elkhart, IN 46517
Part 70 Permit No.: T039-45158-00493
Facility: Plant 6:
(1) panel gelcoat reciprocator machine (SV404), and
(2) panel resin reciprocator machine (SV405)
Parameter: VHAP emissions
Limit: Less than a total of one hundred (100) tons per twelve (12) consecutive month
period with compliance determined at the end of each month. (Condition D.2.2)

QUARTER : _____ YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month (tons)	Previous 11 Months (tons)	12 Month Total (tons)

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: Global Composites, Inc.
Source Address: 58190 County Road 3 South, 28967 Old Hwy 33, 56807 Elk Park Drive, and
57500 County Road 3 South, Elkhart, Indiana 46517
Part 70 Permit No.: 039-45158-00493

Months: _____ to _____ Year: _____

Page 1 of 2

<p>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".</p>	
<p><input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.</p>	
<p><input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD</p>	
<p>Permit Requirement (specify permit condition #)</p>	
<p>Date of Deviation:</p>	<p>Duration of Deviation:</p>
<p>Number of Deviations:</p>	
<p>Probable Cause of Deviation:</p>	
<p>Response Steps Taken:</p>	
<p>Permit Requirement (specify permit condition #)</p>	
<p>Date of Deviation:</p>	<p>Duration of Deviation:</p>
<p>Number of Deviations:</p>	
<p>Probable Cause of Deviation:</p>	
<p>Response Steps Taken:</p>	

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

**Indiana Department of Environmental Management
Office of Air Quality**

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

Source Description and Location

Source Name:	Global Composites, Inc.
Source Location:	58190 County Road 3 South, Elkhart, Indiana 46517 28967 Old Hwy 33, Elkhart, Indiana 46517 56807 Elk Park Drive, Elkhart, Indiana 46517, and 57500 County Road 3 South, Elkhart, Indiana 46517
County:	Elkhart
SIC Code:	3089 (Plastic Products, Not Elsewhere Classified) 3714 (Motor Vehicle Parts and Accessories)
Operation Permit No.:	T 039-45158-00493
Operation Permit Issuance Date:	November 23, 2022
Minor Source Modification No.:	039-47613-00493
Minor Permit Modification No.:	039-47712-00493
Permit Reviewer:	Phillip Jackson

Source Definition

This fiberglass and plastic parts manufacturing source consists of five (5) plants:

- (a) Plant 1 is located at 28967 Old Hwy 33, Elkhart, Indiana;
- (b) Plant 2 is located at 28967 Old Hwy 33, Elkhart, Indiana;
- (c) Plant 3 is located at 56807 Elk Park Drive, Elkhart, Indiana;
- (d) Plant 4 is located at 58190 County Road 3 South, Elkhart, Indiana; and
- (e) Plant 6 (Panel Division) is located at 57500 County Road 3 South, Elkhart, Indiana.

Since the five (5) plants are located on adjacent properties, have similar SIC codes, have support relationships, and are owned by one company, they will be considered as one (1) source.

This determination was initially made under CP No. 039-9601-00493, issued on August 31, 1998.

There is no change being made to this source determination as part of this modification.

Existing Approvals

The source was issued Part 70 Operating Permit Renewal No. 039-45158-00493 on November 23, 2022. There have been no subsequent approvals issued.

County Attainment Status

The source is located in Elkhart County.

Pursuant to amendments to Indiana Code IC 13-17-3-14, effective July 1, 2023, a federal regulation that classifies or amends a designation of attainment, nonattainment, or unclassifiable for any area in Indiana under the federal Clean Air Act is effective and enforceable in Indiana on the effective date of the federal regulation.

Pollutant	Designation
SO ₂	Unclassifiable or attainment effective April 9, 2018, for the 2010 primary 1-hour SO ₂ standard. Better than national secondary standards effective March 3, 1978.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Unclassifiable or attainment effective January 16, 2018, for the 2015 8-hour ozone standard.
PM _{2.5}	Unclassifiable or attainment effective April 15, 2015, for the 2012 annual PM _{2.5} standard.
PM _{2.5}	Unclassifiable or attainment effective December 13, 2009, for the 2006 24-hour PM _{2.5} standard.
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Unclassifiable or attainment effective January 29, 2012, for the 2010 NO ₂ standard.
Pb	Unclassifiable or attainment effective December 31, 2011, for the 2008 lead standard.

- (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. Elkhart County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements of Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) **PM_{2.5}**
Elkhart County has been classified as attainment for PM_{2.5}. Therefore, direct PM_{2.5}, SO₂, and NO_x emissions were reviewed pursuant to the requirements of Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) **Other Criteria Pollutants**
Elkhart County has been classified as attainment or unclassifiable in Indiana for all the other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

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

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

Greenhouse Gas (GHG) Emissions

On June 23, 2014, in the case of *Utility Air Regulatory Group v. EPA*, cause no. 12-1146, (available at http://www.supremecourt.gov/opinions/13pdf/12-1146_4g18.pdf) the United States Supreme Court ruled

that the U.S. EPA does not have the authority to treat greenhouse gases (GHGs) as an air pollutant for the purpose of determining operating permit applicability or PSD Major source status. On July 24, 2014, the U.S. EPA issued a memorandum to the Regional Administrators outlining next steps in permitting decisions in light of the Supreme Court's decision. U.S. EPA's guidance states that U.S. EPA will no longer require PSD or Title V permits for sources "previously classified as 'Major' based solely on greenhouse gas emissions."

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

Source Status - Existing Source

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

	Source-Wide Emissions Prior to Proposed Modification (ton/year)								
	PM ¹	PM ₁₀ ¹	PM _{2.5} ^{1,2}	SO ₂	NO _x	VOC	CO	Single HAP ³	Total HAPs
Total PTE of Entire Source Excluding Fugitive Emissions*	526.42	527.11	527.11	0.07	12.01	2,845.13	10.09	2,477.45 (Styrene)	2,773.52
Total PTE of Entire Source	526.92	527.21	527.13	0.07	12.01	2,845.13	10.09	2,477.45 (Styrene)	2,773.52
Title V Major Source Thresholds	NA	100	100	100	100	100	100	10	25
PSD Major Source Thresholds	250	250	250	250	250	250	250	--	--
Emission Offset Major Source Thresholds	---	NA	NA	NA	NA	NA	NA	--	--

¹Under the Part 70 Permit program (40 CFR 70), PM₁₀ and PM_{2.5}, not particulate matter (PM), are each considered as a "regulated air pollutant."

²PM_{2.5} listed is direct PM_{2.5}.

³Single highest source-wide HAP

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

- (a) This existing source is a major stationary source, under PSD (326 IAC 2-2), because a PSD regulated pollutant(s), PM, PM₁₀, PM_{2.5}, and VOC, are emitted at a rate of 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. 039-45158-00493, issued on November 23, 2022.

Description of Proposed Modification

The Office of Air Quality (OAQ) has reviewed an application, submitted by Global Composites, Inc. on March 6, 2024, relating to the addition of multiple new emission units and removal of existing emission unit.

The following is a list of the new emission units and pollution control device(s):

Plants 1 and 2 - Old Hwy 33

- (a) **One (1) above-ground bulk resin storage tank, identified as Plant 1 T2, approved in 2024 for construction, with a maximum capacity of 6,000 gallons, located at Plant No. 1.**

Plant 3 - Elk Park Drive

- (b) **Two (2) CNC milling machines, approved in 2024 for construction, and exhausting indoors, as follows:**
 - (1) **CNC #4, with a maximum processing rate of 560 pounds, using a portable dust collector as particulate control, identified as DC CNC #3; and**
 - (2) **CNC #5, with a maximum processing rate of 560 pounds, using a portable dust collector as particulate control, identified as DC CNC #4.**

Plant 6 - County Road 3 South

- (c) **One (1) sanding/panel prep area, constructed in 1998, approved in 2024 to replace an existing table saw, with a combined maximum capacity of 250 pounds of Lauan wood panels per hour, and consisting of the following:**

-
 - (2) **One (1) 3HP table saw, approved in 2024 for construction, equipped with an integral dust collection system for particulate control and exhausting inside the building, and**

.....

This unit is replacing the following existing emission unit:

.....

- ~~One (1) table saw, equipped with an integral dust collection system for particulate control and exhausting inside the building, and~~

“Integral Part of the Process” Determination

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

Enforcement Issues

There are no pending enforcement actions related to this modification.

Emission Calculations

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

Permit Level Determination – Part 70 Modification to an Existing Source

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.

Process / Emission Unit	PTE Before Controls of the New Emission Units (ton/year)								
	PM	PM ₁₀	PM _{2.5} ¹	SO ₂	NO _x	VOC	CO	Single HAP ²	Total HAPs
CNC #4 and #5	6.50	6.50	6.50	-	-	-	-	-	-
Plant 1 T2	-	-	-	-	-	-	-	-	-
Total PTE Before Controls of the New Emission Units:	6.50	6.50	6.50	-	-	-	-	-	-

¹PM_{2.5} listed is direct PM_{2.5}.
²Single highest HAP.

Process / Emission Unit	PTE Increase of the Modified Emission Unit (ton/year)								
	PM	PM ₁₀	PM _{2.5} ¹	SO ₂	NO _x	VOC	CO	Single HAP ²	Total HAPs
PTE Before Modification (*Sanding/Grinding Table Saw)	1.04	1.04	1.04	-	-	-	-	-	-
PTE After Modification (*Sanding/Grinding Table Saw)	1.04	1.04	1.04	-	-	-	-	-	-
<i>PTE Increase</i> (*Sanding/Grinding Table Saw)	0	0	0	-	-	-	-	-	-
Total PTE Increase of the Modified Emission Unit(s)/Process	0	0	0	-	-	-	-	-	-

¹PM_{2.5} listed is direct PM_{2.5}.
²Single highest HAP.
 *The Sanding /Grinding Table Saw is considered a woodworking unit with an integral control device, so emissions are considered after control.

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(e)(1)(A), a Minor Source Modification is required because this modification has the potential to emit PM, PM10, and direct PM2.5 that is less than twenty-five (25) tons per year and equal to or greater than five (5) tons per year.

(b) Approval to Operate

Pursuant to 326 IAC 2-7-12(b)(1), this change to the permit is being made through a Minor Permit Modification because:

- (A) The modification does not violate any applicable requirement.
- (B) The modification does not involve significant changes to existing monitoring, reporting or record keeping requirements in the Part 70 permit.
- (C) The modification does not require or change:
 - (i) a case-by-case determination of an emission limitation or other standard;
 - (ii) source specific determination for temporary sources of ambient impacts; or
 - (iii) visibility or increment analysis.
- (D) The modification does not seek to establish or change a Part 70 permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject. This includes the following:
 - (i) A federally enforceable emissions cap assumed to avoid classification as a modification under any provision of Title I of the CAA.
 - (ii) An alternative emissions limit approved under regulations promulgated under Section 112(i)(5) of the CAA.
- (E) This change is not a modification under any provision of Title I of the CAA.
- (F) This change is not required by the Part 70 program to be processed as a significant modification.

Permit Level Determination – PSD Emissions Increase

See Appendix B of this document for detailed PSD Emissions Increase Evaluation.

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/or 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)								Total HAPs
	PM ¹	PM ₁₀ ¹	PM _{2.5} ^{1, 2}	SO ₂	NO _x	VOC	CO	Single HAP ³	
Total PTE of Entire Source Excluding Fugitives*	296.48	297.16	297.16	0.07	12.01	500.29	10.09	2,477.5 (Styrene)	2,773.52
Total PTE of Entire Source	296.98	297.26	297.18	0.07	12.01	500.29	10.09	2,477.5 (Styrene)	2,773.52

	Source-Wide Emissions After Issuance (ton/year)								
	PM ¹	PM ₁₀ ¹	PM _{2.5} ^{1, 2}	SO ₂	NO _x	VOC	CO	Single HAP ³	Total HAPs
Title V Major Source Thresholds	NA	100	100	100	100	100	100	10	25
PSD Major Source Thresholds	250	250	250	250	250	250	250	--	--
Emission Offset Major Source Thresholds	--	NA	NA	NA	NA	NA	NA	--	--

¹Under the Part 70 Permit program (40 CFR 70), PM₁₀ and PM_{2.5}, not particulate matter (PM), are each considered as a "regulated air pollutant."
²PM_{2.5} listed is direct PM_{2.5}.
³Single highest source-wide HAP
 *Fugitive HAP emissions are always included in the source-wide emissions.

- (a) This existing major PSD stationary source will continue to be major under 326 IAC 2-2 because at least one pollutant, PM, PM10, PM2.5, and VOC, has emissions equal to or greater than the PSD major source threshold.
- (b) This existing major source of HAP will continue to be a major source of HAP, as defined in 40 CFR 63.2, because HAP emissions will continue to be equal to or greater than ten (10) tons per year for any single HAP and/or equal to or greater than twenty-five (25) tons per year of a combination of HAPs. Therefore, this source is a major source under Section 112 of the Clean Air Act (CAA).

Federal Rule Applicability Determination

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

New Source Performance Standards (NSPS):

- (a) 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) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (40 CFR Part 63, 326 IAC 14, and 326 IAC 20) included in the permit 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	Control Device	Applicable Emission Limitation	Uncontrolled PTE (tons/year)	Controlled PTE (tons/year)	CAM Applicable (Y/N)	Large Unit (Y/N)
CNC #4 / PM*	DC	326 IAC 6-3-2	<100	-	N	N
CNC #4 / PM	DC	326 IAC 2-2	<100	-	N ²	N
CNC #4 / PM10	DC	326 IAC 2-2	<100	-	N ¹	N
CNC #4 / PM2.5	DC	326 IAC 2-2	<100	-	N ¹	N
CNC #5/ PM*	DC	326 IAC 6-3-2	<100	-	N	N
CNC #5/ PM	DC	326 IAC 2-2	<100	-	N ²	N
CNC #5/ PM10	DC	326 IAC 2-2	<100	-	N ¹	N
CNC # 5/ PM2.5	DC	326 IAC 2-2	<100	-	N ¹	N
Sanding/Panel Prep Area Saw/ PM	DC	-	-	-	N ²	N
Sanding/Panel Prep Area Saw/ PM10	DC	-	-	-	N ¹	N
Sanding/Panel Prep Area Saw/ PM2.5	DC	-	-	-	N ¹	N
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 ¹ CAM does not apply for PM because the uncontrolled PTE of PM is less than the major source threshold.						
N ² Under 326 IAC 2-2, PM is not a surrogate for a regulated air pollutant. Therefore, CAM does not apply to these emission units for the 326 IAC 2-2 PM limitation.						
Controls: DC = Dust Collection System						
Emission units without air pollution controls are not subject to CAM. Therefore, they are not listed.						

Inherent Process Equipment (Woodworking)

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 woodworking baghouse controls are determined to be necessary for the normal and proper operation of the woodworking operations (see the "Integral Part of the Process" Determination" section above for more detail). Therefore, the woodworking baghouses meet the criteria for inherent to the process for the purpose of determining CAM applicability, and are not considered control devices. Therefore, the requirements of 40 CFR Part 64.2, CAM, do not apply to the woodworking operations.

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 1-6-3 (Preventive Maintenance Plan)

The source is subject to 326 IAC 1-6-3.

326 IAC 1-5-2 (Emergency Reduction Plans)

The source is subject to 326 IAC 1-5-2.

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 and Emission Offset section of this document.

This source has the potential to emit PM, PM10, PM2.5, and VOCs greater than 250 tons per year, and is a major source under 326 IAC 2-2.

(1) 1986, 1987, 1994 and 1998 (prior to 2012)

Pursuant to CP 039-9601-00493, issued on August 31, 1998 and modified in Significant Permit Modification No. 039-31593-00493, issued on July 10, 2012 and in order to render the requirements of 326 IAC 2-2 (PSD) not applicable, all operations, including the use of resins, gel coats, mold release agents, coatings, dilution solvents, and cleaning solvents from the following emission units shall be limited such that the emissions of Volatile Organic Compounds (VOC) shall be less than a total of 249 tons per twelve (12) consecutive month period, with compliance determined at the end of each month:

Plants 1 and 2

- (a) One (1) metton injection area, identified as MIJB1;
- (b) One (1) metton painting area, identified as MPB;
- (c) One (1) metton post final/final finish area, identified as MFF;
- (d) One (1) chop lamination booth, identified as SV101;
- (e) One (1) gel coat booth, identified as SV205;

Plant 3

- (f) One (1) gel coat booth, identified as Booth B;
- (g) One (1) lamination booth, identified as Booth A;

Plant 4

- (h) One (1) custom gel coat booth, identified as SV401;
- (i) One (1) custom lamination booth, identified as SV402;

Plant 6

- (j) One (1) gel coat reciprocator flat panel facility, identified as SV404; and
- (k) One (1) resin reciprocator flat panel facility, identified as SV405.

Compliance with this limit renders the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable to the "existing source" prior to the 2012 modification.

These are existing numerical limits that are not being modified in this permit modification.

(2) 2012 Modification

(a) VOC

Prior to the 2012 modification the source was an existing minor source for PSD since the source wide emissions were less than 250 tons per year.

Pursuant to Significant Permit Modification No. 039-31593-00493, issued on July 10, 2012 and in order to render the requirements of 326 IAC 2-2 (PSD) not applicable to the 2012 modification, the use of resins, gel coats, dilution solvents, and cleaning solvents at the following located in Plant 6 (Panel Division):

- (1) controlled spray lamination reciprocator, identified as P6-001 and
- (2) gel coat reciprocator, identified as P6-002

shall be limited to less than 249 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with this limit, in conjunction with insignificant activities permitted in 2012, shall ensure that the emissions increase due to the installation of P6-001 and P6-002 shall remain below 250 tons per year, rendering 326 IAC 2-2 not applicable to the 2012 modification.

Therefore, the 2012 modification was a minor PSD modification for VOC.

After this 2012 modification, this source is considered a PSD major source.

These are existing numerical limits that are not being modified in this permit modification.

(b) PM, PM10, and PM2.5

Prior to the 2012 modification the source was an existing minor source for PSD since the source wide emissions were less than 250 tons per year of PM, PM10, and PM2.5 after consideration of the dry filters controlling the surface coating and gel coating booths.

The potential to emit PM, PM10, and PM2.5 of the 2012 modification was also less than 250 tons per year, each. Therefore, the 2012 modification was a minor PSD modification for PM, PM10, and PM2.5 and no enforceable limits were necessary to render the project minor for PSD purposes.

After this 2012 modification, this source is considered a PSD major source.

(3) 2024 Modification

PM, PM10, and PM2.5

In Part 70 Minor Source Modification 039-47613-00493 and Minor Permit Modification 039-47613-00493, the source is adding the following units:

- (1) Two (2) CNC milling machines, identified as CNC #4 and CNC #5,
- (2) One (1) above-ground bulk resin storage tank, identified as Plant 1 T2, and
- (2) One (1) table saw, replacing an existing table saw.

The uncontrolled potential to emit of these units is less than 25 tons of PM/year, 15 tons of PM10 per year, and 10 tons of PM2.5 per year, so these units involved in the 2024 modification are not subject to the requirements of 326 IAC 2-2 (PSD).

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)

The source is subject to the requirements of 326 IAC 6-4, because the paved and unpaved roads have the potential to emit fugitive particulate emissions. 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 Elkhart 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 Elkhart County) is not subject to the requirements of 326 IAC 6.8 because it is not located in Lake County.

326 IAC 6.8-10 (Lake County: Fugitive Particulate Matter)

Pursuant to 326 IAC 6.8-10-1, this source (located in Elkhart County) is not subject to the requirements of 326 IAC 6.8-10 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:

Plant 1 and 2

Resin Storage Tank (Plant 1T2)

This unit produces no emissions. No state rules apply.

Plant 3

Two (2) CNC Milling Machines (CNC #4 and CNC #5)

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

Pursuant to 326 IAC 6-3-1(a), the requirements of 326 IAC 6-3-2 are applicable to the two (2) CNC milling machines, identified as CNC #4 and CNC #5, since they are manufacturing processes not exempted from this rule under 326 IAC 6-3-1(b) and are not subject to a particulate matter limitation that is as stringent as or more stringent than the particulate limitation established in this rule as specified in 326 IAC 6-3-1(c).

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the two (2) CNC milling machines, identified as CNC #4 and CNC #5, shall individually not exceed 1.747 pounds per hour when operating at a process weight rate of 0.28 tons per hour.

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

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

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

Summary of Process Weight Rate Limits			
Process / Emission Unit	P (ton/hr)	E (lb/hr)	Equation Used
CNC #4	0.28	1.747	$E = 4.10 P^{0.67}$
CNC #5	0.28	1.747	$E = 4.10 P^{0.67}$

Based on calculations, the portable dust collectors is not needed to comply with these limits.

Plant 6

One (1) sanding/panel prep table saw

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

Pursuant to 326 IAC 6-3-1(b)(14), the one (1) sanding/panel prep table saw is not subject to the requirements of 326 IAC 6-3, since the PTE after integral control device is less than 0.551 pounds per hour.

Compliance Determination and Monitoring Requirements

There are no new or modified compliance requirements included with this modification.

Proposed Changes

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

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

(1) The addition of new units and the modified units as shown in the permit is reflected here:

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:

.....

(i) **Two (2) CNC milling machines, approved in 2024 for construction, and exhausting indoors, as follows:**

(1) **CNC #4, with a maximum processing rate of 560 pounds, using a portable dust collector as particulate control, identified as DC CNC #3; and**

(2) **CNC #5, with a maximum processing rate of 560 pounds, using a portable dust collector as particulate control, identified as DC CNC #4.**

Plant 4 - County Road 3 South

~~(j)~~ (j) One (1) custom gel coat booth, identified as SV401, originally constructed in 1986 and relocated to Plant 4 in 1998, equipped with the following:
(i) two (2) air assisted airless spray guns, and
(ii) two (2) backup air assisted airless spray guns,
using dry filters for overspray control, exhausting to Stack SV401, and with a maximum capacity of 19 parts per hour.

Under NESHAP 40 CFR 63, Subpart WWWW, SV401 is considered an existing open molding process.

~~(k)~~ (k) One (1) custom lamination booth, identified as SV402, originally constructed in 1986 and relocated to Plant 4 in 1998, equipped with the following:
(i) four (4) non-atomized application systems, and
(ii) two (2) backup non-atomized application systems,
using dry filters for overspray control, exhausting to Stack SV402, and with a maximum capacity of 19 fiberglass parts per hour.

Under NESHAP 40 CFR 63, Subpart WWWW, SV402 is considered an existing open molding process.

~~(l)~~ (l) One (1) grinding booth, identified as SV403, constructed in 1998, equipped with an air wall dust collection system and exhausting inside the building, with a maximum capacity of 2,179 pounds per hour.

~~(m)~~ (m) One (1) woodworking area, constructed in 2012, including one (1) 10.5 inch table saw, exhausting to a 2-bag closed loop dust collection system with no outside exhaust, with a maximum capacity of 250 pounds per hour, used for cutting plywood, plastic board, and foam board cutting operation.

Plant 6 - County Road 3 South

~~(n)~~ (n) One (1) panel gelcoat reciprocator machine, identified as SV404, constructed in 1998, equipped with a computerized system allowing for controlled spray application, utilizing one (1) air-assisted spray gun, dry filters for particulate control, exhausting to Stack SV 404, and with a maximum capacity of 5 flat panels per hour.

Under NESHAP 40 CFR 63, Subpart WWWW, SV404 is considered an existing open molding process.

(+) (o) One (1) panel resin reciprocator machine, identified as SV405, constructed in 1998, with a maximum capacity of 5 flat panels per hour, and equipped with the following;

- (1) a computerized controlled spray system utilizing one (1) resin reciprocator equipped with fluid impingement or equivalent application systems,
- (2) non-atomized spray application equipment for resin wet out,
- (3) using vacuum bagging for covered cure after roll out on flat panels, and
- (4) dry filters for particulate control and exhausting to Stack SV405.

Under NESHAP 40 CFR 63, Subpart WWWW, SV405 is considered an existing open molding process.

(+) (p) One (1) sanding/panel prep area, constructed in 1998, **approved in 2024 to replace an existing table saw**, with a combined maximum capacity of 250 pounds of Lauan wood panels per hour, and consisting of the following:

- (1) One (1) 52" wide belt sander, equipped with an integral 3-bag dust collection system for particulate control and exhausting inside the building,
- (2) ~~One (1) table saw, equipped with an integral dust collection system for particulate control and exhausting inside the building, and~~

One (1) 3HP table saw, approved in 2024 for construction, equipped with an integral dust collection system for particulate control and exhausting inside the building, and

- (3) One (1) radial arm saw, equipped with an integral dust collection system for particulate control and exhausting inside the building.

(+) (q) One (1) automated lamination reciprocator, identified as P6-001, constructed in 2012, with a maximum capacity of 7 parts per hour, and equipped with the following:

...

(+) (r) One (1) automated panel gelcoat reciprocator machine, identified as P6-002, constructed in 2012, with a maximum capacity of 7 parts per hour, and equipped with the following:

...

(+) (s) One (1) automated panel table saw equipped with circular saws, and one (1) grinding operation, constructed in 2012, used for cutting and seam grinding fiberglass reinforced plywood plastic panels and component parts, with a combined maximum rated capacity of 3,600 pounds per hour, equipped with closed-loop dust collection system.

A.4 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, as defined in 326 IAC 2-7-1(21):

(a) Forty-seven (47) natural gas-fired combustion sources with a total rating of 28.12 million British thermal units per hour:

Emission Unit Description	Construction Date (Year)	Maximum Heat Input Capacity (MMBtu/hr)
...		
One (1) Indirect-Fired Air Make-Up #2, Plant 1	Approved in 2022 for construction 2022	2.65
Two (2) Direct-Fired Radiant Heaters, Plant 3	Approved in 2022 for construction	0.15

Emission Unit Description	Construction Date (Year)	Maximum Heat Input Capacity (MMBtu/hr)
	2022	
Four (4) Direct-Fired Radiant Heaters, Plant 4	Approved in 2022 for construction 2022	0.15, each
...		
One (1) Indirect-Fired Air Make-Up #2, Plant 6	Approved in 2022 for construction 2022	2.50
...		

.....
 (c) ~~Nine (9)~~ **Ten (10)** resin storage tanks, including the following:

(1) ...

(5) One (1) above-ground bulk resin storage tank, identified as Plant 1 T2, approved in 2024 for construction, with a maximum capacity of 6,000 gallons, located at Plant No. 1.

.....

(hh) One (1) CNC grinding machine, identified as CNC Grind Plt 2, ~~approved in 2022 for construction~~ **constructed in 2022**, with particulate matter emissions less than 5 pounds per hour or 25 pounds per day, located at Plant 2, with a maximum process weight less than 100 pounds of fiberglass parts/molds per hour, equipped with two (2) dust collection systems for particulate control, and exhausting indoors, this CNC will be doing 12.5 parts per hour which are coming from the Grind Plant 1.

(ii) One (1) CNC machine, ~~approved in 2022 for construction~~ **constructed in 2022**, with particulate matter emissions less than 5 pounds per hour or 25 pounds per day, located at Plant 4, with a maximum process weight less than 100 pounds of wood per hour, equipped with a dust collection system for particulate control, and exhausting indoors.

(jj) One (1) Window Adhesive Process, ~~approved in 2022 for construction~~ **constructed in 2022**, located at Plant 2, inserting glass windows into fiber glass windshields, and with a maximum capacity of 30 units per day.

....

(2) Changing of the following sections to reflect lettering.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: Plant 4 - County Road 3 South (j) One (1) custom gel coat booth, identified as SV401, originally constructed in 1986 and relocated to Plant 4 in 1998, equipped with the following: ... (k) One (1) custom lamination booth, identified as SV402, originally constructed in 1986 and relocated to Plant 4 in 1998, equipped with the following: ...
--

Plant 6 - County Road 3 South

~~(m)~~ (n) One (1) panel gelcoat reciprocator machine, identified as SV404, constructed in 1998, equipped with a computerized system allowing for controlled spray application, utilizing one (1) air-assisted spray gun and dry filters for particulate control and exhausting to Stack SV 404, and with a maximum capacity of 5 flat panels per hour.

Under NESHAP 40 CFR 63, Subpart WWWW, this machine SV404 is considered an existing open molding process.

~~(n)~~ (o) One (1) panel resin reciprocator machine, identified as SV405, constructed in 1998, with a maximum capacity of 5 flat panels per hour, and equipped with the following;

...

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

.....

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Plant 6 - County Road 3 South

~~(m)~~ (n) One (1) panel gelcoat reciprocator machine, identified as SV404, constructed in 1998, equipped with a computerized system allowing for controlled spray application, utilizing one (1) air-assisted spray gun, using dry filters for particulate control, exhausting to Stack SV 404, and with a maximum capacity of 5 flat panels per hour.

Under NESHAP 40 CFR 63, Subpart WWWW, this machine SV404 is considered an existing open molding process.

~~(n)~~ (o) One (1) panel resin reciprocator machine, identified as SV405, constructed in 1998, with a maximum capacity of 5 flat panels per hour, and equipped with the following;

...

~~(p)~~ (q) One (1) automated lamination reciprocator, identified as P6-001, constructed in 2012, with a maximum capacity of 7 parts per hour, and equipped with the following:

...

~~(q)~~ (r) One (1) automated panel gelcoat reciprocator machine, identified as P6-002, constructed in 2012, with a maximum capacity of 7 parts per hour, and equipped with the following:

...

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

.....

(3) Added emission unit to Section D.3

SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

....

Plant 3 - Elk Park Drive

(h) ...

(i) **Two (2) CNC milling machines, approved in 2024 for construction, and exhausting indoors, as follows:**

(1) **CNC #4, with a maximum processing rate of 560 pounds, using a portable dust collector as particulate control, identified as DC CNC #3; and**

(2) **CNC #5, with a maximum processing rate of 560 pounds, using a portable dust collector as particulate control, identified as DC CNC #4.**

Plant 4 - County Road 3 South

~~(k)~~ (l) One (1) grinding booth, identified as SV403, constructed in 1998, equipped with an air wall dust collection system and exhausting inside the building, and with a maximum capacity of 2,179 pounds per hour.

~~(j)~~ (m) One (1) woodworking area, constructed in 2012, including one (1) 10.5 inch table saw, exhausting to a 2-bag closed loop dust collection system with no outside exhaust, with a maximum capacity of 250 pounds per hour, and used for cutting plywood, plastic board, and foam board cutting operation.

Plant 6 - County Road 3 South

~~(e)~~ (p) One (1) sanding/panel prep area, constructed in 1998, **approved in 2024 to replace an existing table saw**, with a combined maximum capacity of 250 pounds of Lauan wood panels per hour, and consisting of the following:

(1) One (1) 52" wide belt sander, equipped with an integral 3-bag dust collection system for particulate control and exhausting inside the building,

(2) ~~One (1) table saw, equipped with an integral dust collection system for particulate control and exhausting inside the building, and~~

One (1) 3HP table saw, approved in 2024 for construction, equipped with an integral dust collection system for particulate control and exhausting inside the building, and

(3) One (1) radial arm saw, equipped with an integral dust collection system for particulate control and exhausting inside the building.

~~(f)~~ (s) One (1) automated panel table saw equipped with circular saws, and one (1) grinding operation, constructed in 2012, used for cutting and seam grinding fiberglass reinforced plywood plastic panels and component parts, with a combined maximum rated capacity of 3,600 pounds per hour, and equipped with a closed-loop dust collection system.

Insignificant Activities:

(ee) ...

(hh) One (1) CNC grinding machine, identified as CNC Grind Plt 2, ~~approved in 2022 for construction~~ **constructed in 2022**, with particulate matter emissions less than 5 pounds per

hour or 25 pounds per day, located at Plant 2, with a maximum process weight less than 100 pounds of fiberglass parts/molds per hour, equipped with two (2) dust collection systems for particulate control, and exhausting indoors, this CNC will be doing 12.5 parts per hour which are coming from the Grind Plant 1.

(ii) One (1) CNC machine, ~~approved in 2022 for construction~~ **constructed in 2022**, with particulate matter emissions less than 5 pounds per hour or 25 pounds per day, located at Plant 4, with a maximum process weight less than 100 pounds of wood per hour, equipped with a dust collection system for particulate control, and exhausting indoors.

(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.3.1 Particulate [326 IAC 6-3-2]

- (a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the facilities listed in the table below shall be as follows:

Emission Unit	Control Device	Process Weight Rate (tons/hr)	Emission Limit (lbs PM/hr)
...			
Plant 3 CNC Milling (CNC #4)	Portable Closed-loop dust collection system	0.28	1.74
Plant 3 CNC Milling (CNC #5)	Portable Closed-loop dust collection system	0.28	1.74
...		1.09	4.34

The pound per hour limitations were calculated with the following equation:

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

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

...

- (4) Changing of the following sections to reflect lettering and updates.

SECTION D.4 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Insignificant Activities:

(a) Forty-seven (47) natural gas-fired combustion sources with a total rating of 28.12 million British thermal units per hour:

...

Emission Unit Description	Construction Date (Year)	Maximum Heat Input Capacity (MMBtu/hr)
...	1998	3.08

One (1) Indirect-Fired Air Make-Up #2, Plant 1	Approved in 2022 for construction 2022	2.65
One (1) Indirect-Fired Air Make-Up #2, Plant 6	Approved in 2022 for construction 2022	2.50
...	.	0.58

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

.....

SECTION E.1

NESHAP

Emissions Unit Description:

....

Plant 4 - County Road 3 South

~~(j)~~ **(k)** One (1) custom gel coat booth, identified as SV401, originally constructed in 1986 and relocated ...

~~(k)~~ **(l)** One (1) custom lamination booth, identified as SV402, originally constructed in 1986 and relocated to Plant 4 in 1998, equipped with the following:
...

Plant 6 - County Road 3 South

~~(m)~~ **(n)** One (1) panel gelcoat reciprocator machine, identified as SV404, constructed in 1998, equipped with a computerized system allowing for controlled spray application, utilizing one (1) air-assisted spray gun and dry filters for particulate control and exhausting to Stack SV 404, and with a maximum capacity of 5 flat panels per hour.

Under NESHAP 40 CFR 63, Subpart WWWW, this machine SV404 is considered an existing open molding process.

~~(n)~~ **(o)** One (1) panel resin reciprocator machine, identified as SV405, constructed in 1998, with a maximum capacity of 5 flat panels per hour, and equipped with the following:
...

~~(o)~~ **(p)** ~~(q)~~ One (1) automated lamination reciprocator, identified as P6-001, constructed in 2012, with a maximum capacity of 7 parts per hour, and equipped with the following:

...
~~(p)~~ **(r)** One (1) automated panel gelcoat reciprocator machine, identified as P6-002, constructed in 2012, with a maximum capacity of 7 parts per hour, and equipped with the following:

...

(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 March 6, 2024.

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Minor Source Modification No. 039-47613-00493.

The operation of this proposed modification shall be subject to the conditions of the attached proposed Minor Permit Modification No. 039-47712-00493.

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

IDEM Contact

- (a) If you have any questions regarding this permit, please contact Phillip Jackson, 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) 234-0055 or (800) 451-6027, and ask for Phillip Jackson or (317) 234-0055.
- (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: <https://www.in.gov/idem/airpermit/public-participation/>; and the Citizens' Guide to IDEM on the Internet at: <https://www.in.gov/idem/resources/citizens-guide-to-idem/>.

**Appendix A: Emissions Calculations
Summary of Emissions - Unlimited**

Company Name: Global Composites, Inc.
Source Address: 58190 County Road 3 South, Elkhart, IN 46517*
Part 70 Permit No.: 039-45158-00493
Minor Source Modification No.: 039-47613-00493
Minor Permit Modification No.: 039-47712-00493
Reviewer: Phillip Jackson

Unlimited Potential to Emit (tons/year)										
Emission Units	PM	PM10	PM2.5	SO2	NOx	VOC	CO	Total HAPs	Single HAP	
Metton Injection (MJB) - Plants 1 & 2	0	0	0	0	0	49.42	0	5.49	5.49	MDI
Metton Painting Area (MPB) - Plants 1 & 2	9.00	9.00	9.00	0	0	34.88	0	19.55	14.46	Xylene
Metton Post Final/Final Finish Area (MFF) - Plants 1 & 2										
Chop Lamination Booth (SV101) and Gel Coat Booth (SV205) - Plants 1 & 2	58.28	58.28	58.28	0	0	689.85	0	691.94	614.89	Styrene
Gel Coat Booth (B) and Chop Lamination Booth (A) - Plant 3	43.30	43.30	43.30	0	0	477.07	0	467.43	407.59	Styrene
Gel Coat Booth (SV401) and Lamination Booth (SV402) - Plant 4	58.28	58.28	58.28	0	0	689.85	0	691.94	614.89	Styrene
Flat Panel Facility (SV404 and SV405) - Plant 6	78.79	78.79	78.79	0	0	376.75	0	371.84	315.06	Styrene
Reciprocators (P6-001 and P6-002) - Plant 6	0	0	0	0	0	525.0	0	525.0	525.02	Styrene
Grinding Area (Grid Plt 1) - Plants 1 & 2	37.28	37.28	37.28	0	0	0	0	0	0	-
Grinding Booth (C) - Plant 3	8.76	8.76	8.76	0	0	0	0	0	0	-
CNC Milling (Wood and Foam Board Cutting) - Plant 3 (2024 Modification)	6.50	6.50	6.50	0	0	0	0	0	0	-
Grinding Booth (SV403) - Plant 4	45.45	45.45	45.45	0	0	0	0	0	0	-
Woodworking Area (Plywood, Plastic Board, and Foam Board Cutting -Table Saw) - Plant 4	43.79	43.79	43.79	0	0	0	0	0	0	-
Sanding/Panel Prep Area - Plant 6**	2.19	2.19	2.19	0	0	0	0	0	0	-
Automated Panel Table Saw - Plant 6	111.69	111.69	111.69	0	0	0	0	0	0	-
Natural Gas Combustion	0.23	0.91	0.91	0.07	12.01	0.66	10.09	0.23	0.22	Hexane
Welding and Cutting	1.10	1.10	1.10	0	0	0	0	0.08	0.08	Manganese
Woodworking Area - Plant 3***	4.56	4.56	4.56	0	0	0	0	0	0	-
CNC Cutting Machines - Plant 3***	13.69	13.69	13.69	0	0	0	0	0	0	-
CNC Cutting Machine(Grind Plt 2) - Plant 2***	4.56	4.56	4.56	0	0	0	0	0	0	-
CNC Cutting Machines - Plant 4*** (2022 Modification)	4.56	4.56	4.56	0	0	0	0	0	0	-
Modification)	-	-	-	-	-	1.63	-	-	-	-
Panel Table Saw - Plant 6	0.91	0.91	0.91	0	0	0	0	0	0	-
Resin storage tanks	-	-	-	-	-	-	-	-	-	-
Total Non-Fugitive Emissions	532.92	533.60	533.60	0.07	12.01	2,845.13	10.09	2,773.52	2,477.45	Styrene
Fugitive Emissions - Additional Paved Roads	0.23	0.05	0.01	0	0	0	0	0	0	-
Fugitive Emissions - Paved Roads	0.27	0.05	0.01	0	0	0	0	0	0	-
Total Fugitive Emissions	0.50	0.10	0.02	0	0	0	0	0	0	-

*This source has five (5) plants located at four (4) different addresses. This is the address for the corporate offices and Plant 4.

**Control device is integral to the woodworking process. Therefore, the potential to emit is after controls.

***No PTE calculations have been provided for these insignificant activities. Therefore, IDEM has assumed each emission unit has a potential to emit 25 pounds of PM, PM10, and PM2.5 per day.

**Appendix A: Emissions Calculations
Summary of Emissions - Limited**

Company Name: Global Composites, Inc.
Source Address: 58190 County Road 3 South, Elkhart, IN 46517*
Part 70 Permit No.: 039-45158-00493
Minor Source Modification No.: 039-47613-00493
Minor Permit Modification No.: 039-47712-00493
Reviewer: Phillip Jackson

Limited Potential to Emit (tons/year)										
Emission Units	PM	PM10	PM2.5	SO2	NOx	VOC	CO	Total HAPs	Single HAP	
Metton Injection (MIJB) - Plants 1 & 2	0	0	0	0	0	249.00	0	5.49	5.49	MDI
Metton Painting Area (MPB) - Plants 1 & 2*	0.45	0.45	0.45	0	0		0	19.55	14.46	Xylene
Metton Post Final/Final Finish Area (MFF) - Plants 1 & 2*										
Chop Lamination Booth (SV101) and Gel Coat Booth (SV205) - Plants 1 & 2*	2.91	2.91	2.91	0	0		0	691.94	614.89	Styrene
Gel Coat Booth (B) and Chop Lamination Booth (A) - Plant 3*	2.16	2.16	2.16	0	0		0	467.43	407.59	Styrene
Gel Coat Booth (SV401) and Lamination Booth (SV402) - Plant 4*	2.91	2.91	2.91	0	0		0	691.94	614.89	Styrene
Flat Panel Facility (SV404 and SV405) - Plant 6*	2.76	2.76	2.76	0	0	0	371.84	315.06	Styrene	
Reciprocators (P6-001 and P6-002) - Plant 6 (2012 Modification)	0	0	0	0	0	249.0	0	525.02	525.02	Styrene
Grinding Area (Grind Plt 1) - Plants 1 & 2	37.28	37.28	37.28	0	0	0	0	0	0	-
Grinding Booth (C) - Plant 3	8.76	8.76	8.76	0	0	0	0	0	0	-
CNC Milling (Wood and Foam Board Cutting) - Plant 3 (2024 Modification)	6.50	6.50	6.50	0	0	0	0	0	0	-
Grinding Booth (SV403) - Plant 4	45.45	45.45	45.45	0	0	0	0	0	0	-
Woodworking Area (Plywood, Plastic Board, and Foam Board Cutting -Table Saw) - Plant 4 (2012 Modification)	43.79	43.79	43.79	0	0	0	0	0	0	-
Sanding/Panel Prep Area - Plant 6**	2.19	2.19	2.19	0	0	0	0	0	0	-
Automated Panel Table Saw - Plant 6 (2012 Modification)	111.69	111.69	111.69	0	0	0	0	0	0	-
Combustion (2012 Modification)	0.23	0.91	0.91	0.07	12.01	0.66	10.09	0.23	0.22	Hexane
Welding and Cutting	1.10	1.10	1.10	0.0	0.0	0.0	0.0	0.08	0.08	Manganese
Woodworking Area - Plant 3***	4.56	4.56	4.56	0.0	0.0	0.0	0.0	0.0	0.0	-
CNC Cutting Machines - Plant 3***	13.69	13.69	13.69	0.0	0.0	0.0	0.0	0.0	0.0	-
CNC Cutting Machine (Grind Plt 2) - Plant 2*** (2022 Modification)	4.56	4.56	4.56	0.0	0.0	0.0	0.0	0.0	0.0	-
CNC Cutting Machines - Plant 4*** (2022 Modification)	4.56	4.56	4.56	0.0	0.0	0.0	0.0	0.0	0.0	-
Windows Adhesive Process (2022 Modification)	-	-	-	-	-	1.63	-	-	-	-
Panel Table Saw - Plant 6	0.91	0.91	0.91	0.0	0.0	0.0	0.0	0.0	0.0	-
Resin storage tanks	-	-	-	-	-	-	-	-	-	-
Total Non-Fugitive Emissions	296.48	297.16	297.16	0.07	12.01	500.29	10.09	2,773.52	2,477.5	Styrene
Fugitive Emissions - Additional Paved Roads	0.23	0.05	0.01	0	0	0	0	0	0	-
Fugitive Emissions - Paved Roads	0.27	0.05	0.01	0	0	0	0	0	0	-
Total Fugitive Emissions	0.50	0.10	0.02	0	0	0	0	0	0	-

Shaded cells indicate permit limits.

*PTE is after consideration of dry filters, which are required pursuant to 326 IAC 6-3-2(d).

**Control device is integral to the woodworking process. Therefore, the potential to emit is after controls.

***No PTE calculations have been provided for these insignificant activities. Therefore, IDEM has assumed each emission unit has a potential to emit 25 pounds of PM, PM10, and PM2.5 per day.

**Appendix A: Emissions Calculations
Modification Summary**

Company Name: Global Composites, Inc.
Source Address: 58190 County Road 3 South, Elkhart, IN 46517*
Minor Source Modification No.: 039-47613-00493
Minor Permit Modification No.: 039-47712-00493
Reviewer: Phillip Jackson

Uncontrolled Emissions

Emission Units	PM	PM10	PM2.5	SO2	NOx	VOC	CO	Total HAPs	Single HAP	
Plant 3 CNC #4 and #5	6.50	6.50	6.50	-	-	-	-	-	-	-
Sanding/Panel Prep Area Saw - Plant 6**	0.00	0.00	0.00	-	-	-	-	-	-	-
Plant 1 resin storage tank T2	neg	neg				neg				
Totals	6.50	6.50	6.50	-	-	-	-	-	-	-

**Control device is integral to the woodworking process. Therefore, the potential to emit is after controls.

**Appendix A: Emissions Calculations
Summary of Emissions - Unlimited**

Company Name: Global Composites, Inc.
Source Address: 58190 County Road 3 South, Elkhart, IN 46517*
Minor Source Modification No.: 039-47613-00493
Minor Permit Modification No.: 039-47712-00493
Reviewer: Phillip Jackson

Description	Parts Per Hour	Gallons Per Part	VOC per gallon as supplied	PTE VOC (lbs/hr)	PTE VOC (lbs/yr)	PTE VOC (Tons/year)
Sika Primer 206 (1 can = .066 gal 8.45 ounces)	3.75	0.0055	5.17	0.11	934.09	0.47
Sika Activator 100 (1 can = .066 gal 8.45 ounces)	3.75	0.0055	5.65	0.12	1020.81	0.51
Sika Tack Ultrafast US 300 (1 tube = .0792 gal or 10.14 oz	3.75	0.1584	0.25	0.15	1296.41	0.65
Totals						1.63

Methodology:

lbs VOC per hour equals parts per hour X gallons per part X voc per gallon

PTE VOC = VOC (lbs/hour) X (8760 hours/year)

PTE VOC = PTE VOC (lb/yr)/2000 pound per ton

**Appendix A: Emissions Calculations
VOC and Particulate
From Metton Injection Process**

**Company Name: Global Composites, Inc.
Source Address: 58190 County Road 3 South, Elkhart, IN 46517*
Minor Source Modification No.: 039-47613-00493
Minor Permit Modification No.: 039-47712-00493
Reviewer: Phillip Jackson**

Plants 1 and 2 - Metton Injection Process (MJB1)

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Flash Off (fraction)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Part A	8.14	90.00%	0.0%	90.0%	0.0%	0.00%	1.54	50.00	0.01	7.33	7.33	5.64	135.38	24.71	0.00	NA	100%
Part B	8.14	90.00%	0.0%	90.0%	0.0%	0.00%	1.54	50.00	0.01	7.33	7.33	5.64	135.38	24.71	0.00	NA	100%
Uncontrolled												11.28	270.77	49.42	0.00		
Controlled												11.28	270.77	49.42	0.00		
PM Control Efficiency:										0.00%							

METHODOLOGY

Flash Off Fraction of 1% from CP 039-3322-0208, issued on August 24, 1994

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)

Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * Flash Off Fraction

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day) * Flash Off Fraction

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs) * Flash Off Fraction

Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)

Plants 1 and 2 - Metton Injection Process (MJB1)

Material	Density (Lb/Gal)	Weight % MDI	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Flash Off (fraction)	Potential MDI tons per year
Part A	8.14	10.00%	1.54	50.00	0.01	2.75
Part B	8.14	10.00%	1.54	50.00	0.01	2.75
Uncontrolled						5.49

METHODOLOGY

Potential MDI Tons per Year = Density (lb/gal) * Weight % HAP * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs) * Flash Off Fraction

**Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations**

Company Name: Global Composites, Inc.
Source Address: 58190 County Road 3 South, Elkhart, IN 46517*
Minor Source Modification No.: 039-47613-00493
Minor Permit Modification No.: 039-47712-00493
Reviewer: Phillip Jackson

Plant	Process	Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	PM Control Efficiency: 95.00%		Transfer Efficiency	
																Particulate Potential (ton/yr)	Controlled Particulate Potential (ton/yr)		
Plants 1 & 2	Metton Painting Area (MPB)	1140S	12.87	30.32%	0.0%	30.3%	0.0%	46.41%	0.0133	50.00	3.90	3.90	2.60	62.43	11.39	6.55	0.33	8.41	75%
		1125S	8.13	100.00%	0.0%	100.0%	0.0%	33.70%	0.0033	50.00	8.13	8.13	1.36	32.52	5.93	0.00	0.00	24.12	75%
		1135S	7.34	100.00%	0.0%	100.0%	0.0%	0.13%	0.0033	50.00	7.34	7.34	1.22	29.36	5.36	0.00	0.00	5646.15	75%
		As Applied	11.16	46.42%	0.0%	46.4%	0.0%	36.58%	0.0200	50.00	5.18	5.18	5.18	124.31	22.69	6.55	0.33	14.16	75%
		Total												7.96	191.12	34.88	9.00	0.45	
	Metton Post Final/Final Finish Area (MFF)	1140S	12.87	30.32%	0.0%	30.3%	0.0%	46.41%	0.0050	50.00	3.90	3.90	0.98	23.41	4.27	2.45	0.12	8.41	75%
		1125S	8.13	100.00%	0.0%	100.0%	0.0%	33.70%	0.0013	50.00	8.13	8.13	0.51	12.20	2.23	0.00	0.00	24.12	75%
		1135S	7.34	100.00%	0.0%	100.0%	0.0%	0.13%	0.0013	50.00	7.34	7.34	0.46	11.01	2.01	0.00	0.00	5646.15	75%
		As Applied	11.16	46.42%	0.0%	46.4%	0.0%	36.58%	0.0075	50.00	5.18	5.18	1.94	46.62	8.51	2.45	0.12	14.16	75%
		Total													7.96	191.12	34.88	9.00	0.45
	Metton Clean Up Solvent	Pure Lacquer Thinner	7.01	100.00%	40.00%	60.0%	40.00%	0.00%	0.004	50.00	7.01	4.21	0.84	20.19	3.68	0.00	0.00	NA	75%
		MPB/MFF	Total											7.96	191.12	34.88	9.00	0.45	
	Chop Lamination Booth (SV101) and Gel Coat Booth (SV205)	Catalyst DDM9*	9.04	100.00%	98.00%	2.0%	0.00%	0.00%	0.010	19.00	0.18	0.18	0.03	0.82	0.15	0.00	0.00	NA	96.23%
		Acetone Cleaner**	6.61	100.00%	100.00%	0.0%	100.00%	0.00%	0.150	19.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	NA	100%
#1460 Mold Release***		7.27	98.00%	0.00%	98.0%	0.00%	0.00%	0.001	19.00	7.12	7.12	0.14	3.25	0.593	0.00	0.00	NA	100%	
Total												0.17	4.07	0.74	0.00	0.00	NA		
Plant 3	Gel Coat Booth (B) and Chop Lamination Booth (A)	S-0280 Super Flush	8.86	100.00%	0.0%	100.0%	0.0%	0.00%	0.020	6.25	8.86	8.86	1.11	26.58	4.85	0.00	0.00	NA	100%
		Super Blue Resin Cleaner	8.76	100.00%	0.0%	100.0%	0.0%	0.00%	0.020	6.25	8.76	8.76	1.10	26.28	4.80	0.00	0.00	NA	100%
		Total											2.20	52.86	9.65	0.00	0.00	NA	
Plant 4	Gel Coat Booth (SV401) and Lamination Booth (SV402)	Catalyst DDM9*	9.04	100.00%	98.00%	2.0%	0.00%	0.00%	0.010	19.00	0.18	0.18	0.03	0.82	0.15	0.00	0.00	NA	96.23%
		Acetone Cleaner**	6.61	100.00%	100.00%	0.0%	100.00%	0.00%	0.150	19.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	NA	100%
		#1460 Mold Release***	7.27	98.00%	0.00%	98.0%	0.00%	0.00%	0.001	19.00	7.12	7.12	0.14	3.25	0.593	0.00	0.00	NA	100%
		Total											0.17	4.07	0.74	0.00	0.00	NA	
Plant 6	Flat Panel Facility (SV404 and SV405)	Catalyst DDM9*	9.04	100.00%	98.00%	2.0%	0.00%	0.00%	0.030	5.00	0.18	0.18	0.03	0.65	0.12	0.00	0.00	NA	96.23%
		Acetone Cleaner**	6.61	100.00%	100.00%	0.0%	100.00%	0.00%	0.150	5.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	NA	100%
		#1460 Mold Release***	7.27	98.00%	0.00%	98.0%	0.00%	0.00%	0.150	5.00	7.12	7.12	5.34	128.24	23.40	0.00	0.00	NA	100%
		Total											5.37	128.89	23.52	0.00	0.00	NA	
Totals													15.88	381.02	69.54	9.00	0.45		

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hrs/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1-Weight % Volatiles) * (1-Transfer efficiency) * (8760 hrs/yr) * (1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
PM Control Efficiency reduced from 98.5% to 95% with this Part 70 Operating Permit Renewal to be consistent with IDEM policy.
* Emissions for MEKP are based upon the VOC content as MEK (maximum 2%) and PM/PM10 as 0% Solids by Weight
**Acetone is used to clean rollers and spray application equipment and is done in solvent cans with lids.
***Mold release is a wax and is wiped on. Therefore, the transfer efficiency is 100%.

**Appendix A: Emission Calculations
HAP Emission Calculations**

**Company Name: Global Composites, Inc.
Source Address: 58190 County Road 3 South, Elkhart, IN 46517*
Minor Source Modification No.: 039-47613-00493
Minor Permit Modification No.: 039-47712-00493
Reviewer: Phillip Jackson**

Plant	Process	Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Dimethyl Phthalate	Weight % Toluene	Weight % Xylene	Weight % Ethylbenzene	Dimethyl Phthalate Emissions (ton/yr)	Toluene Emissions (ton/yr)	Xylene Emissions (ton/yr)	Ethylbenzene Emissions (ton/yr)	Total HAPs (ton/yr)	
Plants 1 & 2	Metton Painting Area (MPB)	1140S	12.87	0.013	50.00			20.00%	5.40%			7.52	2.03	9.55	
		1125S	8.13	0.003	50.00			25.00%	6.90%			1.48	0.41	1.89	
		1135S	7.34	0.003	50.00		18.00%	20.00%	5.50%		0.96	1.07	0.29	2.33	
		Subtotal									0.00	0.96	10.07	2.73	13.77
	Metton Post Final/Final Finsih Area (MFF)	1140S	12.87	0.005	50.00			20.00%	5.40%				2.82	0.76	3.58
		1125S	8.13	0.001	50.00			25.00%	6.90%				0.56	0.15	0.71
		1135S	7.34	0.001	50.00		18.00%	20.00%	5.50%		0.36	0.40	0.11	0.87	
		Subtotal									0.00	0.36	3.78	1.03	5.16
	MPB/MMF Clean Up Solvent	Pure Lacquer Thinner	7.01	0.004	50.00			10.00%					0.61		0.61
	MPB/MMF	Total								0.00	1.33	14.46	3.76	19.55	
	Chop Lamination Booth	Catalyst DDM9	9.04	0.010	19.00	32.00%					2.41				2.41
		#1460 Mold Release	7.27	0.001	19.00			70.00%				0.42			0.42
		Total									2.41	0.42	0.00	0.00	2.83
	Plant 4 Gel Coat Booth (SV401) and	Catalyst DDM9	9.04	0.010	19.00	32.00%					2.41				2.41
#1460 Mold Release		7.27	0.001	19.00			70.00%				0.42			0.42	
Total										2.41	0.42	0.00	0.00	2.83	
Plant 6 Flat Panel Facility (SV404 and	Catalyst DDM9	9.04	0.030	5.00	32.00%					1.90				1.90	
	#1460 Mold Release	7.27	0.150	5.00			70.00%				16.72			16.72	
	Total									1.90	16.72	0.00	0.00	18.62	

METHODOLOGY

HAPs emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

**Appendix A: Emissions Calculations
Reinforced Plastics and Composites - Open Molding**

**Company Name: Global Composites, Inc.
Source Address: 58190 County Road 3 South, Elkhart, IN 46517*
Minor Source Modification No.: 039-47613-00493
Minor Permit Modification No.: 039-47712-00493
Reviewer: Phillip Jackson**

PM Control Efficiency: 95.00%

Plant	Process (Application Method)	Material	Density (lb/gal)	Weight % Monomer VOC	CFA Unified Emission Factor (lbs/ton)	Gallons per Unit	Units per hour	lbs VOC per hour	lbs VOC per day	VOC (tons/year)	HAPs (tons/year)	PM (tons/year) before control	PM (tons/year) after control	Transfer Efficiency
Plants 1 & 2 Custom Parts	SV205 (Air Assisted Airless)	Yellow Gel Coat - Styrene	9.91	33.41%	294.00	3.00	19.00	83.04	1,992.86	363.70	363.70	58.28	2.91	96.23%
		Yellow Gel Coat - MMA	9.91	4.11%	60.00	3.00	19.00	16.95	406.71	74.22	74.22	0.00	0.00	100.00%
Plant 3 Custom Parts	Booth B (Air Assisted Airless)	Production Resin - Styrene	8.95	32.68%	71.00	9.50	19.00	57.35	1,376.38	251.19	251.19	0.00	0.00	100.00%
		Yellow Gel Coat - Styrene	9.91	33.41%	294.00	5.97	6.25	54.36	1304.54	238.1	238.1	38.1	1.91	96.23%
	Booth A (Flow coat)	Yellow Gel Coat - MMA	9.91	4.11%	60.00	5.97	6.25	11.09	266.23	48.6	48.6	0.00	0.00	100.00%
		Production Resin - Styrene	8.95	32.68%	71.00	9.97	6.25	19.80	475.16	86.7	86.7	0.00	0.00	100.00%
Plant 3 Mold Production	Booth B (Air Assisted Airless)	Tooling Gel - Styrene	9.54	38.97%	418.00	5.30	1.00	10.57	253.62	46.3	46.3	4.84	0.242	96.23%
		Tooling Gel - MMA	9.54	3.00%	45.00	5.97	1.00	1.28	30.76	5.6	5.6	0.00	0.00	100.00%
		Tooling Resin - Styrene	8.95	46.99%	115.00	9.97	1.00	5.13	123.14	22.5	22.5	0.00	0.00	100.00%
	Booth A	Filled Tooling Resin - Styrene	5.06	36.50%	83.00	9.97	1.00	2.09	50.25	9.2	9.2	0.00	0.00	100.00%
		Filled Tooling Resin - MMA	5.06	2.96%	45.00	9.97	1.00	1.14	27.24	5.0	5.0	0.00	0.00	100.00%
Plant 3 Pattern Production	Booth B (Air Assisted Airless)	Tooling Gel - Styrene	9.54	38.97%	418.00	5.30	0.0625	0.66	15.85	2.89	2.89	0.30	0.015	96.23%
		Tooling Gel - MMA	9.54	3.00%	45.00	5.97	0.0625	0.08	1.92	0.4	0.4	0.00	0.00	100.00%
		Tooling Resin - Styrene	8.95	46.99%	115.00	9.97	0.0625	0.32	7.70	1.4	1.4	0.00	0.00	100.00%
	Booth A	Filled Tooling Resin - Styrene	5.06	36.50%	83.00	9.97	0.0625	0.13	3.14	0.6	0.6	0.00	0.00	100.00%
		Filled Tooling Resin - MMA	5.06	2.96%	45.00	9.97	0.0625	0.07	1.70	0.3	0.3	0.00	0.00	100.00%
		Yellow Gel Coat - Styrene	9.91	33.41%	294.00	3.00	19.00	83.04	1992.86	363.7	363.7	58.3	2.91	96.23%
Plant 4 Custom Parts	SV402 (Flow coat)	Yellow Gel Coat - MMA	9.91	4.11%	60.00	3.00	19.00	16.95	406.71	74.2	74.2	0.00	0.00	100.00%
		Production Resin - Styrene	8.95	33.00%	71.00	9.50	19.00	57.35	1376.38	251.2	251.2	0.00	0.00	100.00%
Plant 6 Flat Panel Facility	SV404 (Air Assisted Airless)	Gel Coat Reciprocator - Styrene	11.17	30.50%	271.45	5.20	5.00	39.42	946.01	172.6	172.6	31.3	1.56	96.23%
		Gel Coat Reciprocator - MMA	11.17	4.28%	60.00	5.20	5.00	8.71	209.10	38.2	38.2	24.0	1.20	99.00%
	SV405 (Non-atomized Spray)	Resin Reciprocator - Styrene	8.89	35.14%	77.00	19.00	5.00	32.52	780.36	142.4	142.4	24.0	1.20	99.00%
Total										2,198.87	2,198.87	215.12	10.76	

METHODOLOGY

Potential VOC Pounds per Hour = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Emission factor (lb/ton) * (1 ton/2000 lbs)
 Potential VOC Pounds per Day = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * (24 hrs / 1 day) * Emission factor (lb/ton) * (1 ton/2000 lbs)
 Potential VOC Tons per Year = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * (8760 hr/yr) * (1 ton / 2000 lbs) * Emission factor (lb/ton) * (1 ton/2000 lbs)
 Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1 - Weight % Volatiles) * (1 - Transfer efficiency) * (8760 hr/yr) * (1 ton / 2000 lbs)
 Total = Sum of all worst case coatings and solvents used
 Emission Factor (lbs VOC/ton) taken from "Unified Emission Factors for Open Molding of Composites", Composite Fabricators Association (CFA), October 13, 2009.

**Appendix A: Emissions Calculations
Plant 6 Reciprocators**

Company Name: Global Composites, Inc.
Source Address: 58190 County Road 3 South, Elkhart, IN 46517*
Minor Source Modification No.: 039-47613-00493
Minor Permit Modification No.: 039-47712-00493
Reviewer: Phillip Jackson

VOC Emissions (Plant 6 (Panel Division))

Descrsiption of Process	Material Density (lb/gal)	Mat. Usage (gal/part)	Mat. Usage (lb/part)	Max Parts per Hour	Max Parts 8760 hours	Material Usage tons per year	CFA UEF	VOC (lb/year) Emissions	VOC PTE tons/year
Resin Reciprocator (Panel resin)	9.10	20.43	185.91	7.00	61,320.00	5,700.09	60.03	342,159.46	171.08
Gelcoat Reciprocator									
Panel White	11.76	4.00	47.04	7.00	61,320.00	1,442.25	215.70	311,095.94	155.55
Panel Primer	11.11	4.00	44.44	7.00	61,320.00	1,362.53	291.21	396,787.03	198.39

Methodology:

VOC (tons per year) = density (lb/gal)*gallons/part*parts/8760 hrs* UEF/2000 lb/ton

(Note: The transfer efficiency for reciprocators is 100%. Therefore, there are no PM emissions.

The dry filters are placed over the exhaust banks to protect the exhaust fans from hardened resins which would block air flow)

Emission Factor (lbs VOC/ton) taken from "Unified Emission Factors for Open Molding of Composites", Composite Fabricators Association (CFA), October 13, 2009.

(Unrestricted) Total VOC PTE (tons/year) = 525.0
Total HAP (tons/yr) = 525.0

Appendix A: Emissions Calculations
Particulate from Woodworking and Fiberglass Grinding and Cutting Operations

Company Name: Global Composites, Inc.
Source Address: 58190 County Road 3 South, Elkhart, IN 46517*
Minor Source Modification No.: 039-47613-00493
Minor Permit Modification No.: 039-47712-00493
Reviewer: Phillip Jackson

Process	Total PM Collected (lbs/hour)	Process Weight Rate (lbs/hr)	Control Efficiency (%)	Potential Emissions (lbs/hour)	Potential Emissions (tons/year)	Potential Emissions after Control (lbs/hour)	Potential Emissions after Control (tons/year)
Plant 3 - Grinding (Booth C)	1.90	777	95.0%	2.00	8.76	0.100	0.438
Plant 3 - CNC Milling (CNC #4 and CNC #5) (Wood and Foam Board Cutting) **	1.41	1,120	95.0%	1.48	6.50	0.074	0.325
Plant 4 - Woodworking Area (Plywood, Plastic Board, and Foam Board Cutting -Table Saw)	9.50	250	95.0%	10.00	43.79	0.500	2.19
Plant 6 - Sanding/Panel Pep Area (Belt Sander and Saws)*	9.50	250	95.0%	10.00	43.79	0.500	2.19
Plant 6 - Insignificant Panel Table Saw (Original)	0.197	496	95.0%	0.21	0.91	0.010	0.05

Process	Material Processed (lbs/hour)	Emission Rate (%)	Control Efficiency (%)	Potential Emissions (lbs/hour)	Potential Emissions (tons/year)	Potential Emissions after Control (lbs/hour)	Potential Emissions after Control (tons/year)
Plants 1 & 2 - Grinding Area (Grind Pit 1)	340.50	2.50%	85.0%	8.51	37.28	1.28	5.59
Plant 4 - Grinding Booth (SV403)	2,179.00	0.48%	95.0%	10.38	45.45	0.519	2.27

METHODOLOGY

Emissions data from material collected. Emission rates from CPs 3322 and 9601 unless otherwise noted. Assume worst case: all PM = PM10 = PM2.5.

Potential Emissions (lbs/hr) = PM Collected (lbs/hr) / Control Efficiency (%)

Potential Emissions (tons/year) = Potential Emissions (lbs/hr) x (8760 hours/year) x (1 ton/2000 lbs)

Potential Emissions after Control (lbs/hr) = Potential Emissions (lbs/hr) * (1 - Control Efficiency (%))

Potential Emissions after Control (tons/year) = Potential Emissions after Control (lbs/hr) x (8760 hours/year) x (1 ton/2000 lbs)

*This process sands and cuts wood only (i.e. 100% wood). Woodworking control devices are integral to the process. Therefore, unlimited PTE is considered after control.

** These units contain a portable control device that will not always be in operation. Therefore, the Unlimited and controlled PTE will not include the controlled PTE calculations.

Emission Unit ID	Max PM generated lb/hr	Capture Efficiency (%)	Control Efficiency (%)	PTE PM (tons/yr)	PTE PM (lb/hr)	PTE PM (tons/yr)
				Before	After	After
				control	control	control
Plant 6 - Automated Panel Table Saw	25.5	90%	99.98%	111.69	2.55	11.19

Methodology

Max PM (uncontrolled) generated from the panel trimming and grinding operations is an engineering estimate. Assume worst case: all PM = PM10 = PM:

PTE of of PM Before controls (tons/year) = Maximum PM generated (lbs/hr) X 8760 (hrs/yr) X 1 ton/2000lbs

PTE of PM After controls (tons/year) = PTE of PM Before Controls (tons/yr) X (1-(Capture Efficiency (%) X Control Efficiency (%)))

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
NG Combustion Unit List - All Plants

Company Name: Global Composites, Inc.
Source Address: 58190 County Road 3 South, Elkhart, IN 46517*
Minor Source Modification No.: 039-47613-00493
Minor Permit Modification No.: 039-47712-00493
Reviewer: Phillip Jackson

Description	Number of Emission Units	Heat Input Capacity Per Unit (MMBtu/hr)	Total Maximum Potential Throughput (MMBtu/hr)
Air Makeup Unit, Plant 1	1	3.080	3.08
Air Makeup #2, Plant 1	1	2.650	2.65
Radiant Heaters, Plant 1	7	0.100	0.70
Radiant Heater, Plant 1	1	0.125	0.13
Radiant Heaters, Plant 2	5	0.100	0.50
Air Makeup Unit, Plant 3	1	2.160	2.16
Radiant Heater, Plant 3	2	0.075	0.15
Radiant Heater, Plant 3	3	0.100	0.30
New Radiant Heaters, Plant 3	2	0.150	0.30
Air Makeup Units, Plant 4	2	4.320	8.64
New Radiant Heaters, Plant 4	4	0.150	0.60
Radiant Heater, Plant 4	4	0.150	0.60
Forced Air Heaters, Plant 4	5	0.250	1.25
Air Makeup Unit, Plant 6	1	3.080	3.08
New Air Makeup #2, Plant 6	1	2.500	2.50
Radiant Heater, Plant 6	1	0.125	0.13
Radiant Heater, Plant 6	1	0.150	0.15
Radiant Heater, Plant 6	1	0.175	0.18
Thermo-Cycler Building Heater, Plant 6	1	0.580	0.58
Space Heaters, Plant 6	3	0.100	0.30
TOTALS	47		27.97

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100**

Company Name: Global Composites, Inc.
Source Address: 58190 County Road 3 South, Elkhart, IN 46517*
Minor Source Modification No.: 039-47613-00493
Minor Permit Modification No.: 039-47712-00493
Reviewer: Phillip Jackson

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr
27.97	1,020	240.17

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
	1.90	7.60	7.60	0.60	100.00 **see below	5.50	84.00
Potential Emission in tons/yr	0.23	0.91	0.91	0.07	12.01	0.66	10.09

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

Methodology

All emission factors are based on normal firing.
 MMBtu = 1,000,000 Btu
 MMCF = 1,000,000 Cubic Feet of Gas
 Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03
 Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu
 Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Hazardous Air Pollutants (HAPs)

	HAPs - Organics					
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	Total - Organics
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	
Potential Emission in tons/yr	2.5E-04	1.4E-04	9.0E-03	0.22	4.1E-04	0.23

	HAPs - Metals					
	Lead	Cadmium	Chromium	Manganese	Nickel	Total - Metals
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/yr	6.0E-05	1.3E-04	1.7E-04	4.6E-05	2.5E-04	6.6E-04
					Total HAPs	0.23
					Worst HAP	0.22

Methodology is the same as above.
 The five highest organic and metal HAPs emission factors are provided above.
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Appendix A: Emissions Calculations
Welding and Thermal Cutting**

Company Name: Global Composites, Inc.
Source Address: 58190 County Road 3 South, Elkhart, IN 46517*
Minor Source Modification No.: 039-47613-00493
Minor Permit Modification No.: 039-47712-00493
Reviewer: Phillip Jackson

PROCESS	Number of Stations	consumption per station (lbs/hr)		EMISSION FACTORS* (lb pollutant/lb electrode)				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
WELDING												
Metal Inert Gas (MIG)(carbon steel)	8	3.5		0.0055	0.0005			0.154	0.014	0.000	0	0.014
Stick (E7018 electrode)	1	3.5		0.0211	0.0009			0.074	0.003	0.000	0	0.003
Tungsten Inert Gas (TIG)(carbon steel)	1	3.5		0.0055	0.0005			0.019	0.002	0.000	0	0.002
FLAME CUTTING	Number of Stations	Max. Metal Thickness Cut (in.)	Max. Metal Cutting Rate (in./minute)	EMISSION FACTORS (lb pollutant/1,000 inches cut, 1" thick)**				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
Plasma (Plant 4 and Plant 6)**	2	0.75	14	0.0039				0.005	0.000	0.000	0.000	0.000
EMISSION TOTALS												
Potential Emissions lbs/hr								0.25				0.02
Potential Emissions lbs/day								6.05				0.45
Potential Emissions tons/year								1.10				0.08

Methodology:

*Emission Factors are default values for carbon steel unless a specific electrode type is noted in the Process column.

**Emission Factor for plasma cutting from American Welding Society (AWS). Trials reported for wet cutting of 8 mm thick mild steel with 3.5 m/min cutting speed (at 0.2 g/min emitted). Therefore, the emission factor for plasma cutting is for 8 mm thick rather than 1 inch, and the maximum metal thickness is not used in calculating the emissions.

Using AWS average values: (0.25 g/min)/(3.6 m/min) x (0.0022 lb/g)/(39.37 in./m) x (1,000 in.) = 0.0039 lb/1,000 in. cut, 8 mm thick

Plasma cutting emissions, lb/hr: (# of stations)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 8 mm thick)

Cutting emissions, lb/hr: (# of stations)(max. metal thickness, in.)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 1" thick)

Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used)

Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day

Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/year x 1 ton/2,000 lbs.

Appendix A: Emission Calculations
Fugitive Dust Emissions - Paved Roads Plants 1 & 2

Company Name: Global Composites, Inc.
 Source Address: 58190 County Road 3 South, Elkhart, IN 46517*
 Minor Source Modification No.: 039-47613-00493
 Minor Permit Modification No.: 039-47712-00493
 Reviewer: Phillip Jackson

Paved Roads at Industrial Site

The following calculations determine the amount of emissions created by paved roads, based on 8,760 hours of use and AP-42, Ch 13.2.1 (1/2011).

Vehicle Information (provided by source)

Type	Maximum number of vehicles per day	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight Loaded (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Employees (entering plant) (one-way trip)	21.0	1.0	21.0	2.0	42.0	25	0.005	0.1	36.3
Employees (leaving plant) (one-way trip)	21.0	1.0	21.0	2.0	42.0	25	0.005	0.1	36.3
Box Truck Deliveries Entering	1.0	1.0	1.0	4.0	4.0	25	0.005	0.0	1.7
Box Truck Deliveries Leaving	1.0	1.0	1.0	4.0	4.0	25	0.005	0.0	1.7
Semi Deliveries entering	1.0	1.0	1.0	16.0	16.0	25	0.005	0.0	1.7
Semi Deliveries Leaving	1.0	1.0	1.0	16.0	16.0	25	0.005	0.0	1.7
Global Delivery Trucks entering	1.0	3.0	3.0	5.0	15.0	25	0.005	0.0	5.2
Global Delivery Trucks Leaving	1.0	3.0	3.0	5.0	15.0	25	0.005	0.0	5.2
Totals			52.0		154.0			0.2	89.9

Average Vehicle Weight Per Trip =

3.0	tons/trip
-----	-----------

 Average Miles Per Trip =

0.00	miles/trip
------	------------

Unmitigated Emission Factor, Ef = $[k * (sL)^{0.91} * (W)^{1.02}]$ (Equation 1 from AP-42 13.2.1)

	PM	PM10	PM2.5	
where k =	0.011	0.0022	0.00054	lb/VMT = particle size multiplier (AP-42 Table 13.2.1-1)
W =	3.0	3.0	3.0	tons = average vehicle weight (provided by source)
sL =	9.7	9.7	9.7	g/m ² = silt loading value for paved roads at iron and steel production facilities - Table 13.2.1-3)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, Eext = $E * [1 - (p/4N)]$ (Equation 2 from AP-42 13.2.1)

Mitigated Emission Factor, Eext = $Ef * [1 - (p/4N)]$
 where p =

125	days of rain greater than or equal to 0.01 inches (see Fig. 13.2.1-2)
-----	---

 N =

365	days per year
-----	---------------

Unmitigated Emission Factor, Ef =

PM	PM10	PM2.5
0.263	0.053	0.0129

 lb/mile
 Mitigated Emission Factor, Eext =

PM	PM10	PM2.5
0.241	0.048	0.0118

 lb/mile
 Dust Control Efficiency =

50%	50%	50%
-----	-----	-----

 (pursuant to control measures outlined in fugitive dust control plan)

Process	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10 (tons/yr)	Unmitigated PTE of PM2.5 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM2.5 (tons/yr)
Employees (entering plant) (one-way trip)	0.00478	0.00096	0.00023	0.00437	0.00087	0.00021
Employees (leaving plant) (one-way trip)	0.00478	0.00096	0.00023	0.00437	0.00087	0.00021
Box Truck Deliveries Entering	0.00023	0.00005	0.00001	0.00021	0.00004	0.00001
Box Truck Deliveries Leaving	0.00023	0.00005	0.00001	0.00021	0.00004	0.00001
Semi Deliveries entering	0.00023	0.00005	0.00001	0.00021	0.00004	0.00001
Semi Deliveries Leaving	0.00023	0.00005	0.00001	0.00021	0.00004	0.00001
Global Delivery Trucks entering	0.00023	0.00005	0.00001	0.00021	0.00004	0.00001
Global Delivery Trucks Leaving	0.00023	0.00005	0.00001	0.00021	0.00004	0.00001
Totals	0.01	0.002	0.001	0.01	0.002	0.001

Methodology

Total Weight driven per day (ton/day) = [Maximum Weight Loaded (tons/trip)] * [Maximum trips per day (trip/day)]
 Maximum one-way distance (mi/trip) = [Maximum one-way distance (feet/trip)] / [5280 ft/mile]
 Maximum one-way miles (miles/day) = [Maximum trips per year (trip/day)] * [Maximum one-way distance (mi/trip)]
 Average Vehicle Weight Per Trip (ton/trip) = SUM[Total Weight driven per day (ton/day)] / SUM[Maximum trips per day (trip/day)]
 Average Miles Per Trip (miles/trip) = SUM[Maximum one-way miles (miles/day)] / SUM[Maximum trips per year (trip/day)]
 Unmitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] * [Unmitigated Emission Factor (lb/mile)] * (ton/2000 lbs)
 Mitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] * [Mitigated Emission Factor (lb/mile)] * (ton/2000 lbs)

Abbreviations

PM = Particulate Matter
 PM10 = Particulate Matter (<10 um)
 PM2.5 = Particle Matter (<2.5 um)
 PTE = Potential to Emit

**Appendix A: Emission Calculations
Fugitive Dust Emissions - Paved Roads Plant 3**

Company Name: Global Composites, Inc.
Source Address: 58190 County Road 3 South, Elkhart, IN 46517*
Minor Source Modification No.: 039-47613-00493
Minor Permit Modification No.: 039-47712-00493
Reviewer: Phillip Jackson

Paved Roads at Industrial Site

The following calculations determine the amount of emissions created by paved roads, based on 8,760 hours of use and AP-42, Ch 13.2.1 (1/2011).

Vehicle Information (provided by source)

Type	Maximum number of vehicles per day	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight Loaded (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Employees (entering plant) (one-way trip)	20.0	1.0	20.0	2.0	40.0	75	0.014	0.3	103.7
Employees (leaving plant) (one-way trip)	20.0	1.0	20.0	2.0	40.0	75	0.014	0.3	103.7
Box Truck Deliveries Entering	1.0	1.0	1.0	4.0	4.0	50	0.009	0.0	3.5
Box Truck Deliveries Leaving	1.0	1.0	1.0	4.0	4.0	50	0.009	0.0	3.5
Semi Deliveries entering	1.0	1.0	1.0	16.0	16.0	50	0.009	0.0	3.5
Semi Deliveries Leaving	1.0	1.0	1.0	16.0	16.0	50	0.009	0.0	3.5
Global Delivery Trucks entering	1.0	1.0	1.0	11.0	11.0	50	0.009	0.0	3.5
Global Delivery Trucks Leaving	1.0	1.0	1.0	11.0	11.0	50	0.009	0.0	3.5
Totals			46.0		142.0			0.6	228.1

Average Vehicle Weight Per Trip = $\frac{3.1}{0.01}$ tons/trip
Average Miles Per Trip = $\frac{3.1}{0.01}$ miles/trip

Unmitigated Emission Factor, Ef = $[k * (sL)^{0.91} * (W)^{1.02}]$ (Equation 1 from AP-42 13.2.1)

	PM	PM10	PM2.5	
where k =	0.011	0.0022	0.00054	lb/VMT = particle size multiplier (AP-42 Table 13.2.1-1)
W =	3.1	3.1	3.1	tons = average vehicle weight (provided by source)
sL =	9.7	9.7	9.7	g/m ² = silt loading value for paved roads at iron and steel production facilities - Table 13.2.1-3)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, Eext = $E * [1 - (p/4N)]$ (Equation 2 from AP-42 13.2.1)

Mitigated Emission Factor, Eext = $E_f * [1 - (p/4N)]$
where p = $\frac{125}{365}$ days of rain greater than or equal to 0.01 inches (see Fig. 13.2.1-2)
N = 365 days per year

	PM	PM10	PM2.5	
Unmitigated Emission Factor, Ef =	0.275	0.055	0.0135	lb/mile
Mitigated Emission Factor, Eext =	0.251	0.050	0.0123	lb/mile

Process	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10 (tons/yr)	Unmitigated PTE of PM2.5 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM2.5 (tons/yr)
Employees (entering plant) (one-way trip)	0.01	0.00	0.00	0.01	0.00	0.00
Employees (leaving plant) (one-way trip)	0.01	0.00	0.00	0.01	0.00	0.00
Box Truck Deliveries Entering	0.00	0.00	0.00	0.00	0.00	0.00
Box Truck Deliveries Leaving	0.00	0.00	0.00	0.00	0.00	0.00
Semi Deliveries entering	0.00	0.00	0.00	0.00	0.00	0.00
Semi Deliveries Leaving	0.00	0.00	0.00	0.00	0.00	0.00
Global Delivery Trucks entering	0.00	0.00	0.00	0.00	0.00	0.00
Global Delivery Trucks Leaving	0.00	0.00	0.00	0.00	0.00	0.00
Totals	0.03	0.01	0.00	0.03	0.01	0.00

Methodology

Total Weight driven per day (ton/day) = [Maximum Weight Loaded (tons/trip)] * [Maximum trips per day (trip/day)]
Maximum one-way distance (mi/trip) = [Maximum one-way distance (feet/trip)] / [5280 ft/mile]
Maximum one-way miles (miles/day) = [Maximum trips per year (trip/day)] * [Maximum one-way distance (mi/trip)]
Average Vehicle Weight Per Trip (ton/trip) = SUM[Total Weight driven per day (ton/day)] / SUM[Maximum trips per day (trip/day)]
Average Miles Per Trip (miles/trip) = SUM[Maximum one-way miles (miles/day)] / SUM[Maximum trips per year (trip/day)]
Unmitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] * [Unmitigated Emission Factor (lb/mile)] * (ton/2000 lbs)
Mitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] * [Mitigated Emission Factor (lb/mile)] * (ton/2000 lbs)

Abbreviations

PM = Particulate Matter
PM10 = Particulate Matter (<10 um)
PM2.5 = Particle Matter (<2.5 um)
PTE = Potential to Emit

**Appendix A: Emission Calculations
Fugitive Dust Emissions - Paved Roads Plant 4**

**Company Name: Global Composites, Inc.
Source Address: 58190 County Road 3 South, Elkhart, IN 46517*
Minor Source Modification No.: 039-47613-00493
Minor Permit Modification No.: 039-47712-00493
Reviewer: Phillip Jackson**

Paved Roads at Industrial Site

The following calculations determine the amount of emissions created by paved roads, based on 8,760 hours of use and AP-42, Ch 13.2.1 (1/2011).

Vehicle Information (provided by source)

Type	Maximum number of vehicles per day	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight Loaded (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Employees (entering plant) (one-way trip)	80.0	1.0	80.0	2.0	160.0	50	0.009	0.8	276.5
Employees (leaving plant) (one-way trip)	80.0	1.0	80.0	2.0	160.0	50	0.009	0.8	276.5
Box Truck Deliveries Entering	2.0	1.0	2.0	4.0	8.0	50	0.009	0.0	6.9
Box Truck Deliveries Leaving	2.0	1.0	2.0	4.0	8.0	50	0.009	0.0	6.9
Semi Deliveries entering	1.0	1.0	1.0	16.0	16.0	75	0.014	0.0	5.2
Semi Deliveries Leaving	1.0	1.0	1.0	16.0	16.0	75	0.014	0.0	5.2
Global Delivery Trucks entering	4.0	3.0	12.0	5.0	60.0	300	0.057	0.7	248.9
Global Delivery Trucks Leaving	4.0	3.0	12.0	5.0	60.0	300	0.057	0.7	248.9
Office Staff (entering plant) (one-way trip)	10.0	1.0	10.0	2.0	20.0	25	0.005	0.0	17.3
Office Staff (leaving plant) (one-way trip)	10.0	1.0	10.0	2.0	20.0	25	0.005	0.0	17.3
Visitors Entering Parking Lot	5.0	1.0	5.0	2.0	10.0	25	0.005	0.0	8.6
Visitors Leaving Parking Lot	5.0	1.0	5.0	2.0	10.0	25	0.005	0.0	8.6
Totals			220.0		548.0			3.1	1126.8

Average Vehicle Weight Per Trip =

2.5

 tons/trip
Average Miles Per Trip =

0.01

 miles/trip

Unmitigated Emission Factor, Ef = $[k * (sL)^{0.91} * (W)^{1.02}]$ (Equation 1 from AP-42 13.2.1)

	PM	PM10	PM2.5	
where k =	0.011	0.0022	0.00054	lb/MT = particle size multiplier (AP-42 Table 13.2.1-1)
W =	2.5	2.5	2.5	tons = average vehicle weight (provided by source)
sL =	9.7	9.7	9.7	g/m ² = silt loading value for paved roads at iron and steel production facilities - Table 13.2.1-3)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, Eext = $E * [1 - (p/4N)]$ (Equation 2 from AP-42 13.2.1)

Mitigated Emission Factor, Eext = $E_f * [1 - (p/4N)]$
where p =

125

 days of rain greater than or equal to 0.01 inches (see Fig. 13.2.1-2)
N =

365

 days per year

	PM	PM10	PM2.5	
Unmitigated Emission Factor, Ef =	0.221	0.044	0.0108	lb/mile
Mitigated Emission Factor, Eext =	0.202	0.040	0.0099	lb/mile

Process	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10 (tons/yr)	Unmitigated PTE of PM2.5 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM2.5 (tons/yr)
Employees (entering plant) (one-way trip)	0.03	0.01	0.00	0.03	0.01	0.00
Employees (leaving plant) (one-way trip)	0.03	0.01	0.00	0.03	0.01	0.00
Box Truck Deliveries Entering	0.00	0.00	0.00	0.00	0.00	0.00
Box Truck Deliveries Leaving	0.00	0.00	0.00	0.00	0.00	0.00
Semi Deliveries entering	0.00	0.00	0.00	0.00	0.00	0.00
Semi Deliveries Leaving	0.00	0.00	0.00	0.00	0.00	0.00
Global Delivery Trucks entering	0.03	0.01	0.00	0.03	0.01	0.00
Global Delivery Trucks Leaving	0.03	0.01	0.00	0.03	0.01	0.00
Office Staff (entering plant) (one-way trip)	0.00	0.00	0.00	0.00	0.00	0.00
Office Staff (leaving plant) (one-way trip)	0.00	0.00	0.00	0.00	0.00	0.00
Visitors Entering Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00
Visitors Leaving Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00
Totals	0.12	0.02	0.01	0.11	0.02	0.01

Methodology

Total Weight driven per day (ton/day) = [Maximum Weight Loaded (tons/trip)] * [Maximum trips per day (trip/day)]
Maximum one-way distance (mi/trip) = [Maximum one-way distance (feet/trip)] / [5280 ft/mile]
Maximum one-way miles (miles/day) = [Maximum trips per year (trip/day)] * [Maximum one-way distance (mi/trip)]
Average Vehicle Weight Per Trip (ton/trip) = SUM[Total Weight driven per day (ton/day)] / SUM[Maximum trips per day (trip/day)]
Average Miles Per Trip (miles/trip) = SUM[Maximum one-way miles (miles/day)] / SUM[Maximum trips per year (trip/day)]
Unmitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] * [Unmitigated Emission Factor (lb/mile)] * (ton/2000 lbs)
Mitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] * [Mitigated Emission Factor (lb/mile)] * (ton/2000 lbs)

Abbreviations

PM = Particulate Matter
PM10 = Particulate Matter (<10 um)
PM2.5 = Particulate Matter (<2.5 um)
PTE = Potential to Emit

**Appendix A: Emission Calculations
Fugitive Dust Emissions - Paved Roads Plant 6**

Company Name: Global Composites, Inc.
Source Address: 58190 County Road 3 South, Elkhart, IN 46517*
Minor Source Modification No.: 039-47613-00493
Minor Permit Modification No.: 039-47712-00493
Reviewer: Phillip Jackson

Paved Roads at Industrial Site

The following calculations determine the amount of emissions created by paved roads, based on 8,760 hours of use and AP-42, Ch 13.2.1 (1/2011).

Vehicle Information (provided by source)

Type	Maximum number of vehicles per day	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight Loaded (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Employees (entering plant) (one-way trip)	33.0	1.0	33.0	2.0	66.0	200	0.038	1.3	456.3
Employees (leaving plant) (one-way trip)	33.0	1.0	33.0	2.0	66.0	200	0.038	1.3	456.3
Box Truck Deliveries Entering	1.0	1.0	1.0	4.0	4.0	200	0.038	0.0	13.8
Box Truck Deliveries Leaving	1.0	1.0	1.0	4.0	4.0	200	0.038	0.0	13.8
Semi Deliveries entering	1.0	1.0	1.0	16.0	16.0	400	0.076	0.1	27.7
Semi Deliveries Leaving	1.0	1.0	1.0	16.0	16.0	400	0.076	0.1	27.7
Global Delivery Trucks entering	1.0	1.0	1.0	11.0	11.0	400	0.076	0.1	27.7
Global Delivery Trucks Leaving	1.0	1.0	1.0	11.0	11.0	400	0.076	0.1	27.7
Totals			72.0		194.0			2.9	1050.8

Average Vehicle Weight Per Trip = $\frac{2.7}{0.04}$ tons/trip
Average Miles Per Trip = $\frac{2.7}{0.04}$ miles/trip

Unmitigated Emission Factor, Ef = $[k * (sL)^{0.91} * (W)^{1.02}]$ (Equation 1 from AP-42 13.2.1)

	PM	PM10	PM2.5	
where k =	0.011	0.0022	0.00054	lb/VMT = particle size multiplier (AP-42 Table 13.2.1-1)
W =	2.7	2.7	2.7	tons = average vehicle weight (provided by source)
sL =	9.7	9.7	9.7	g/m ² = silt loading value for paved roads at iron and steel production facilities - Table 13.2.1-3)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, Eext = $E * [1 - (p/4N)]$ (Equation 2 from AP-42 13.2.1)

Mitigated Emission Factor, Eext = $Ef * [1 - (p/4N)]$
where p = $\frac{125}{365}$ days of rain greater than or equal to 0.01 inches (see Fig. 13.2.1-2)
N = 365 days per year

	PM	PM10	PM2.5	
Unmitigated Emission Factor, Ef =	0.239	0.048	0.0117	lb/mile
Mitigated Emission Factor, Eext =	0.219	0.044	0.0107	lb/mile

Process	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10 (tons/yr)	Unmitigated PTE of PM2.5 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM2.5 (tons/yr)
Employees (entering plant) (one-way trip)	0.05	0.01	0.00	0.05	0.01	0.00
Employees (leaving plant) (one-way trip)	0.05	0.01	0.00	0.05	0.01	0.00
Box Truck Deliveries Entering	0.00	0.00	0.00	0.00	0.00	0.00
Box Truck Deliveries Leaving	0.00	0.00	0.00	0.00	0.00	0.00
Semi Deliveries entering	0.00	0.00	0.00	0.00	0.00	0.00
Semi Deliveries Leaving	0.00	0.00	0.00	0.00	0.00	0.00
Global Delivery Trucks entering	0.00	0.00	0.00	0.00	0.00	0.00
Global Delivery Trucks Leaving	0.00	0.00	0.00	0.00	0.00	0.00
Totals	0.13	0.03	0.01	0.11	0.02	0.01

Methodology

Total Weight driven per day (ton/day) = [Maximum Weight Loaded (tons/trip)] * [Maximum trips per day (trip/day)]
Maximum one-way distance (mi/trip) = [Maximum one-way distance (feet/trip)] / [5280 ft/mile]
Maximum one-way miles (miles/day) = [Maximum trips per year (trip/day)] * [Maximum one-way distance (mi/trip)]
Average Vehicle Weight Per Trip (ton/trip) = SUM[Total Weight driven per day (ton/day)] / SUM[Maximum trips per day (trip/day)]
Average Miles Per Trip (miles/trip) = SUM[Maximum one-way miles (miles/day)] / SUM[Maximum trips per year (trip/day)]
Unmitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] * [Unmitigated Emission Factor (lb/mile)] * (ton/2000 lbs)
Mitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] * [Mitigated Emission Factor (lb/mile)] * (ton/2000 lbs)

Abbreviations

PM = Particulate Matter
PM10 = Particulate Matter (<10 um)
PM2.5 = Particle Matter (<2.5 um)
PTE = Potential to Emit

**Appendix A: Emission Calculations
Fugitive Dust Emissions - Paved Roads**

Company Name: **Global Composites, Inc.**
 Source Address: **58190 County Road 3 South, Elkhart, IN 46517***
 Minor Source Modification No.: **039-47613-00493**
 Minor Permit Modification No.: **039-47712-00493**
 Reviewer: **Phillip Jackson**

Paved Roads at Industrial Site

The following calculations determine the amount of emissions created by paved roads, based on 8,760 hours of use and AP-42, Ch 13.2.1 (1/2011).

Vehicle Information (provided by source)

Type	Maximum number of vehicles per day	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight of Loaded Vehicle (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Vehicle (entering plant) (one-way trip)	4.0	3.0	12.0	11.0	132.0	300	0.057	0.7	248.9
Vehicle (leaving plant) (one-way trip)	4.0	3.0	12.0	11.0	132.0	300	0.057	0.7	248.9
Totals			24.0		264.0			1.4	497.7

Average Vehicle Weight Per Trip = $\frac{11.0}{11.0}$ tons/trip
 Average Miles Per Trip = $\frac{0.06}{0.06}$ miles/trip

Unmitigated Emission Factor, Ef = $[k * (sL)^{0.91} * (W)^{1.02}]$ (Equation 1 from AP-42 13.2.1)

	PM	PM10	PM2.5	
where k =	0.011	0.0022	0.00054	lb/VMT = particle size multiplier (AP-42 Table 13.2.1-1)
W =	11.0	11.0	11.0	tons = average vehicle weight
sL =	9.7	9.7	9.7	g/m ² = silt loading value for paved roads at iron and steel production facilities - Table 13.2.1-3)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, Eext = $E * [1 - (p/4N)]$ (Equation 2 from AP-42 13.2.1)

Mitigated Emission Factor, Eext = $E_f * [1 - (p/4N)]$
 where p = $\frac{125}{365}$ days of rain greater than or equal to 0.01 inches (see Fig. 13.2.1-2)
 N = $\frac{365}{365}$ days per year

	PM	PM10	PM2.5	
Unmitigated Emission Factor, Ef =	1.004	0.201	0.0493	lb/mile
Mitigated Emission Factor, Eext =	0.918	0.184	0.0451	lb/mile
Dust Control Efficiency =	50%	50%	50%	(pursuant to control measures outlined in fugitive dust control plan)

Process	Mitigated PTE of PM (Before Control) (tons/yr)	Mitigated PTE of PM10 (Before Control) (tons/yr)	Mitigated PTE of PM2.5 (Before Control) (tons/yr)
Vehicle (entering plant) (one-way trip)	0.11	0.02	0.01
Vehicle (leaving plant) (one-way trip)	0.11	0.02	0.01
Totals	0.23	0.05	0.01

Methodology

Total Weight driven per day (ton/day) = [Maximum Weight of Loaded Vehicle (tons/trip)] * [Maximum trips per day (trip/day)]
 Maximum one-way distance (mi/trip) = [Maximum one-way distance (feet/trip)] / [5280 ft/mile]
 Maximum one-way miles (miles/day) = [Maximum trips per year (trip/day)] * [Maximum one-way distance (mi/trip)]
 Average Vehicle Weight Per Trip (ton/trip) = SUM[Total Weight driven per day (ton/day)] / SUM[Maximum trips per day (trip/day)]
 Average Miles Per Trip (miles/trip) = SUM[Maximum one-way miles (miles/day)] / SUM[Maximum trips per year (trip/day)]
 Unmitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] * [Unmitigated Emission Factor (lb/mile)] * (ton/2000 lbs)
 Mitigated PTE (Before Control) (tons/yr) = [Maximum one-way miles (miles/yr)] * [Mitigated Emission Factor (lb/mile)] * (ton/2000 lbs)
 Mitigated PTE (After Control) (tons/yr) = [Mitigated PTE (Before Control) (tons/yr)] * [1 - Dust Control Efficiency]

Abbreviations

PM = Particulate Matter
 PM10 = Particulate Matter (<10 um)
 PM2.5 = Particulate Matter (<2.5 um)
 PTE = Potential to Emit

Appendix B - PSD Emissions Increase Evaluation

Indiana Department of Environmental Management Office of Air Quality

Source Description and Location

Source Name:	Global Composites, Inc.
Source Location:	58190 County Road 3 South, Elkhart, Indiana 46517 28967 Old Hwy 33, Elkhart, Indiana 46517 56807 Elk Park Drive, Elkhart, Indiana 46517, and 57500 County Road 3 South, Elkhart, Indiana 46517
County:	Elkhart
SIC Code:	3089 (Plastic Products, Not Elsewhere Classified) 3714 (Motor Vehicle Parts and Accessories)
Operation Permit No.:	T 039-45158-00493
Operation Permit Issuance Date:	November 23, 2022
Minor Source Modification No.:	039-47613-00493
Minor Permit Modification No.:	039-47712-00493
Permit Reviewer:	Phillip Jackson

PSD Emissions Increase

(a) "Hybrid" Applicability Test: ATP and ATPA

Since this project involves the construction of new emissions unit (and/or emissions units considered new for this evaluation) and existing emissions units, a Hybrid applicability test, specified in 326 IAC 2-2-2(d)(5), is used to determine if the project results in a Significant Emissions Increase. A Hybrid applicability test uses both the Actual to Potential (ATP) test for new emissions units and Actual to Projected Actual (ATPA) test for existing emissions units affected by the modification.

The source has provided information and emission calculations as part of the application for this Hybrid test. IDEM, OAQ reviewed the emission calculations provided by the source to verify the emissions factors and methodology used, but has not made any determination regarding the validity and accuracy of certain information such as actual throughput, actual usage and actual hours of operation.

(b) New Emissions Units

(1) Pursuant to 326 IAC 2-2-1(t)(1), a new emissions unit is any emissions unit that is, or will be, newly constructed and that has existed for less than two (2) years from the date the emissions unit first operated.

The following proposed emissions unit(s) are considered as new emissions units for this evaluation.

(a) **Two (2) CNC milling machines, approved in 2024 for construction, and exhausting indoors, as follows:**

(1) **CNC #4, with a maximum processing rate of 560 pounds, using a portable dust collector as particulate control, identified as DC CNC #3; and**

(2) **CNC #5, with a maximum processing rate of 560 pounds, using a portable dust collector as particulate control, identified as DC CNC #4.**

(b) **One (1) above-ground bulk resin storage tank, identified as Plant 1 T2, approved in 2024 for construction, with a maximum capacity of 6,000 gallons, located at Plant No. 1.**

Emissions from this resin storage tank are negligible.

(2) Baseline Actual Emissions of the New Emissions Units

For a new emissions unit, the baseline actual emissions for purposes of determining the Emissions Increase that will result from the initial construction and operation of the unit shall equal zero (0) and thereafter, for all other purposes, shall equal the unit's potential to emit.

(3) Actual to Potential (ATP) Summary for the New Emissions units

An Actual to Potential (ATP) applicability test has been conducted the new emissions units and/or the emissions units considered new for this evaluation.

$$ATP_{(new\ unit)} = PTE_{(new\ unit)} - \text{Baseline Emissions}_{(new\ unit)}$$

CNC #4 and #5 ATP (tons/yr)								
Process/Emissions Unit	PM	PM ₁₀	PM _{2.5} *	SO ₂	NO _x	VOC	CO	GHGs
CNC #4 and #5								
PTE	6.50	6.50	6.50	-	-	-	-	-
Baseline Emissions	0	0	0	0	0	0	0	0
ATP	6.50	6.50	6.50	-	-	-	-	-

*PM2.5 listed is direct PM2.5.
¹The Sanding /Grinding Table Saw is considered a woodworking unit with an integral control device, so emissions are considered after control.

(c) Existing Emissions Unit Affected by the Modification

(1) The following emissions units will be considered existing for the purpose of this ATPA test:

Replacement emissions units. A new emissions unit, that replaces an existing emissions unit and is identical to or functionally equivalent to the replaced emissions unit is a replacement unit. A replacement emissions unit is an existing emissions unit. [326 IAC 2-2-1(tt)]

The following proposed replacement unit(s) will be considered as modified existing emissions units for this evaluation.

- (a) One (1) sanding/panel prep area, constructed in 1998, **approved in 2024 to replace an existing table saw**, with a combined maximum capacity of 250 pounds of Lauan wood panels per hour, and consisting of the following:

.....

- (2) **One (1) 3HP table saw, approved in 2024 for construction, equipped with an integral dust collection system for particulate control and exhausting inside the building.**

This change is considered to be functionally equivalent and will be considered a replacement for the purpose of this PSD Emission Increase Evaluation:

- (i) Similar location:

The replacement table saw, is going to be located in the same place where the existing table saw is located.

- (ii) Similar function and process:

The replacement table saw, will perform the same functions as the existing table saw. The overall process of the table saw remains the same since it is not changing as a result of replacing the table saw.

- (iii) The same maximum capacity:

The replacement table saw will have a maximum throughput that is the same as the existing table saw that is being replaced.

- (2) Baseline Actual Emissions of the Existing Emissions Units
Pursuant to 326 IAC 2-2-1(pp)(2)(B), in lieu of determining the Projected Actual Emissions for the replacement table saw, the emissions unit's potential to emit (PTE) was used for the analysis.

- (3) Actual to Projected Actual (ATPA) Summary
An Actual to Projected Actual (ATPA) applicability test has been conducted for the existing emissions units.

Pursuant to 326 IAC 2-2-1(pp)(2)(B), in lieu of determining the Projected Actual Emissions, a source may elect to use the emissions unit's potential to emit (PTE). When using the an emissions unit's PTE in lieu of using the Projected Actual Emissions, the source can NOT use Could Have Accomodated Emissions/Demand Growth Exclusions.

$$\text{ATPA}_{(\text{existing unit})} = \text{PTE}_{(\text{existing unit})} - \text{Baseline Emissions}$$

Existing Emissions Unit ATPA (tons/year)								
Process/Emissions Unit	PM	PM ₁₀	PM _{2.5}	SO ₂	NO _x	VOC	CO	GHGs
Sanding/Grinding Table Saw								
PTE	1.04	1.04	1.04	-	-	-	-	-
Baseline Actual Emissions (PTE)	0	0	0	0	0	0	0	0
ATP_(existing unit)	1.04	1.04	1.04	-	-	-	-	-

- (d) Hybrid Test: ATP and ATPA Summary
 The Emissions Increase of the project is the sum of the Emissions Increase for **each emissions unit**, calculated using the Actual to Potential (ATP) test for the new emissions units and the Actual to Projected Actual (ATPA) test for existing emissions units.

$$\text{Hybrid Applicability Test} = \text{ATP}_{(\text{new unit})} + \text{ATPA}_{(\text{existing unit})}$$

- (e) Project Emissions:

Project Emissions Increase (tons/year) "Hybrid Test"								
Process/Emissions Unit	PM	PM ₁₀	PM _{2.5} [*]	SO ₂	NO _x	VOC	CO	GHGs
CNC #4 and #5 (ATP)	6.50	6.50	6.50	-	-	-	-	-
Sanding/Grinding Table Saw (ATPA)	1.04	1.04	1.04	-	-	-	-	-
Project Emissions Increase	7.54	7.54	7.54	-	-	-	-	-
Significant Levels	25	15	10	40	40	40	100	75,000 CO _{2e}

*PM_{2.5} listed is direct PM_{2.5}.

¹The Sanding /Grinding Table Saw is considered a woodworking unit with an integral control device, so emissions are considered after control.

- (f) Conclusion
 The Permittee has provided information as part of the application for this approval that based on Hybrid test in 326 IAC 2-2-2 that this modification to an existing major PSD stationary source will not be major because the Emissions Increase of each PSD regulated pollutant is less than the PSD significant levels levels (i.e., the modification does not cause a Significant Emissions Increase). The applicant will be required to keep records and report in accordance with 326 IAC 2-2-8 (Prevention of Significant Deterioration (PSD) Requirements: Source Obligation).

**Appendix B: Emissions Calculations
ATP Evaluation**

Company Name: Global Composites, Inc.
Source Address: 58190 County Road 3 South, Elkhart, IN 46517*
Minor Source Modification No.: 039-47613-00493
Minor Permit Modification No.: 039-47712-00493
Reviewer: Phillip Jackson

Uncontrolled Emissions

Emission Units	PM	PM10	PM2.5	SO2	NOx	VOC	CO	Total HAPs	Single HAP	
Plant 3 CNC #4 and #5	6.50	6.50	6.50	-	-	-	-	-	-	-
Plant 6 Sanding/Panel Prep Area Saw *	1.04	1.04	1.04	-	-	-	-	-	-	-
Plant 1 resin storage tank T2	neg	neg	neg			neg				
Totals	7.54	7.54	7.54	-	-	-	-	-	-	-

*Control device is integral to the woodworking process. Therefore, the potential to emit is after controls.

Appendix A: Emissions Calculations
Particulate from Woodworking and Fiberglass Grinding and Cutting Operations

Company Name: Global Composites, Inc.
Source Address: 58190 County Road 3 South, Elkhart, IN 46517*
Minor Source Modification No.: 039-47613-00493
Minor Permit Modification No.: 039-47712-00493
Reviewer: Phillip Jackson

Process	Total PM Collected (lbs/hour)	Process Weight Rate (lbs/hr)	Control Efficiency (%)	Potential Emissions (lbs/hour)	Potential Emissions (tons/year)	Potential Emissions after Control (lbs/hour)	Potential Emissions after Control (tons/year)
Plant 3 - Grinding (Booth C)	1.90	777	95.0%	2.00	8.76	0.100	0.438
Plant 3 - CNC Milling (CNC #4 and CNC #5) (Wood and Foam Board Cutting) **	1.41	1,120	95.0%	1.48	6.50	0.074	0.325
Plant 4 - Woodworking Area (Plywood, Plastic Board, and Foam Board Cutting -Table Saw)	9.50	250	95.0%	10.00	43.79	0.500	2.19
Plant 6 - Sanding/Panel Pep Area (Belt Sander and Saws)*	9.50	250	95.0%	10.00	43.79	0.500	2.19
Plant 6 - Insignificant Panel Table Saw (Original)	0.197	496	95.0%	0.21	0.91	0.010	0.05

Process	Material Processed (lbs/hour)	Emission Rate (%)	Control Efficiency (%)	Potential Emissions (lbs/hour)	Potential Emissions (tons/year)	Potential Emissions after Control (lbs/hour)	Potential Emissions after Control (tons/year)
Plants 1 & 2 - Grinding Area (Grind Pit 1)	340.50	2.50%	85.0%	8.51	37.28	1.28	5.59
Plant 4 - Grinding Booth (SV403)	2,179.00	0.48%	95.0%	10.38	45.45	0.519	2.27

METHODOLOGY

Emissions data from material collected. Emission rates from CPs 3322 and 9601 unless otherwise noted. Assume worst case: all PM = PM10 = PM2.5.

Potential Emissions (lbs/hr) = PM Collected (lbs/hr) / Control Efficiency (%)

Potential Emissions (tons/year) = Potential Emissions (lbs/hr) x (8760 hours/year) x (1 ton/2000 lbs)

Potential Emissions after Control (lbs/hr) = Potential Emissions (lbs/hr) * (1 - Control Efficiency (%))

Potential Emissions after Control (tons/year) = Potential Emissions after Control (lbs/hr) x (8760 hours/year) x (1 ton/2000 lbs)

*This process sands and cuts wood only (i.e. 100% wood). Woodworking control devices are integral to the process. Therefore, unlimited PTE is considered after control.

** These units contain a portable control device that will not always be in operation. Therefore, the Unlimited and controlled PTE will not include the controlled PTE calculations.

Emission Unit ID	Max PM generated lb/hr	Capture Efficiency (%)	Control Efficiency (%)	PTE PM (tons/yr)	PTE PM (lb/hr)	PTE PM (tons/yr)
				Before control	After control	After control
Plant 6 - Automated Panel Table Saw	25.5	90%	99.98%	111.69	2.55	11.19

Methodology

Max PM (uncontrolled) generated from the panel trimming and grinding operations is an engineering estimate. Assume worst case: all PM = PM10 = PM2.5

PTE of of PM Before controls (tons/year) = Maximum PM generated (lbs/hr) X 8760 (hrs/yr) X 1 ton/2000lbs

PTE of PM After controls (tons/year) = PTE of PM Before Controls (tons/yr) X (1-(Capture Efficiency (%) X Control Efficiency (%)))



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Eric J. Holcomb
Governor

Brian C. Rockensuess
Commissioner

SENT VIA U.S. MAIL: CONFIRMED DELIVERY AND SIGNATURE REQUESTED

TO: Teri Schenk
Global Composites, Inc.
58190 CR 3 S
Elkhart, IN 46517

DATE: June 27, 2024

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

SUBJECT: Final Decision
Title V – Minor Permit Modification
039-47712-00493

This notice is to inform you that a final decision has been issued for the air permit application referenced above.

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. In addition, the Notice of Decision has been sent to the OAQ Permits Branch Interested Parties List and, if applicable, the Consultant/Agent and/or Responsible Official/Authorized Individual.

The final decision and supporting materials are available electronically; the original signature page is enclosed for your convenience. The final decision and supporting materials available electronically at:

IDEM's online searchable database: <http://www.in.gov/apps/idem/caats/> . Choose Search Option **by Permit Number**, then enter permit 47712

and

IDEM's Virtual File Cabinet (VFC): <https://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.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178, or toll-free at 1-800-451-6027 (ext. 3-0178), and ask to speak to the permit reviewer who prepared the permit. If you think you have received this document in error, or have difficulty accessing the documents online, please contact Joanne Smiddie-Brush of my staff at 1-800-451-6027 (ext 3-0185), or via e-mail at jbrush@idem.IN.gov.

Final Applicant Cover Letter 8/20/20-acces via website



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Eric J. Holcomb
Governor

Brian C. Rockensuess
Commissioner

June 27, 2024

TO: Elkhart Public Library – Main Library

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

Subject: **Important Information for Display Regarding a Final Determination**

Applicant Name: Global Composites, Inc.
Permit Number: 039-47712-00493

You previously received information to make available to the public during the public comment period of a draft permit. Enclosed is a copy of the final decision and supporting materials for the same project. Please place the enclosed information along with the information you previously received. To ensure that your patrons have ample opportunity to review the enclosed permit, **we ask that you retain this document for at least 60 days.**

The applicant is responsible for placing a copy of the application in your library. If the permit application is not on file, or if you have any questions concerning this public review process, please contact Joanne Smiddie-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185.

Enclosures
Final Library 1/9/2017



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Eric J. Holcomb
Governor

Brian C. Rockensuess
Commissioner

June 27, 2024
Global Composites, Inc.
039-47712-00493

To: Interested Parties

This notice is to inform you that a final decision has been issued for the air permit application referenced above. This notice is for informational purposes only. You are not required to take any action.

You are receiving this notice because you asked to be on IDEM's notification list for this company and/or county; or because your property is nearby the company being permitted; or because you represent a local/regional government entity.

The enclosed Notice of Decision Letter provides additional information about the final permit decision.

The final decision and supporting materials 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 47712

and


IDEM's Virtual File Cabinet (VFC): <https://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.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178, or toll-free at 1-800-451-6027 (ext. 3-0178), and ask to speak to the permit reviewer who prepared the permit.

Please Note: *If you 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
Final Interested Parties Cover Letter 10/13/2023

Mail Code 61-53

IDEM Staff	KBOURQUE 6/27/2024 Global Composites Inc 039-47712-00493 (final)		Type of Mail: CERTIFICATE OF MAILING ONLY	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee
											Remarks
1		Teri Schenk Global Composites Inc 58190 CR 3 S Elkhart IN 46517 (Source CAATS) Sent Via UPS Campus Ship									
2		Gary Beck President Global Composites Inc 58190 CR 3 S Elkhart IN 46517 (RO CAATS)									
3		Elkhart City Council and Mayors Office 229 S Second St Elkhart IN 46516 (Local Official)									
4		Elkhart Public Library 300 S 2nd St Elkhart IN 46516-3184 (Library)									
5		Elkhart County Health Department 608 Oakland Ave Elkhart IN 46516 (Health Department)									
6		Elkhart County Board of Commissioners 117 N 2nd St Goshen IN 46526 (Local Official)									
7		Jeri Seely The Mail-Journal PO Box 188 Milford IN 46542 (Affected Party)									
8		Mr. Roger Schneider The Goshen News 114 S Main St Goshen IN 46526 (Affected Party)									
9		Nibco, Inc. 701 Eisenhower Drive Goshen IN 46526 (Affected Party)									
10											
11											
12											
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