



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

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

for Patrick Industries, Inc. d/b/a Charleston Corporation
in Marshall County

Significant Permit Modification No.: 099-38057-00037

The Indiana Department of Environmental Management (IDEM) has received an application from Patrick Industries, Inc. d/b/a Charleston Corporation, located at 1849 and 1820 Dogwood Road, Bremen, Indiana 46506, for a significant modification of its Part 70 Operating Permit issued on May 26, 2016. If approved by IDEM's Office of Air Quality (OAQ), this proposed modification would allow Patrick Industries, Inc. d/b/a Charleston Corporation to make certain changes at its existing source. Patrick Industries, Inc. d/b/a Charleston Corporation has applied to construct and operate a new final finishing area.

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

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

Bremen Public Library
304 N Jackson St.
Bremen, IN 46506

and

IDEM Northern Regional Office
300 N. Michigan Street, Suite 450
South Bend, IN 46601-1295

A copy of the preliminary findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>.

How can you participate in this process?

The date that this notice is published in a newspaper marks the beginning of a 30-day public comment period. If the 30th day of the comment period falls on a day when IDEM offices are closed for business, all comments must be postmarked or delivered in person on the next business day that IDEM is open.

You may request that IDEM hold a public hearing about this draft permit. If adverse comments concerning the **air pollution impact** of this draft permit are received, with a request for a public hearing, IDEM will decide whether or not to hold a public hearing. IDEM could also decide to hold a public meeting instead of, or in addition to, a public hearing. If a public hearing or meeting is held, IDEM will make a separate announcement of the date, time, and location of that hearing or meeting. At a hearing,

you would have an opportunity to submit written comments and make verbal comments. At a meeting, you would have an opportunity to submit written comments, ask questions, and discuss any air pollution concerns with IDEM staff.

Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so that you can be added to IDEM's mailing list to receive notice of future action related to this permit. If you do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit number SPM 099-38057-00037 in all correspondence.

Comments should be sent to:

Brian Wright
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for extension 4-6544
Or dial directly: (317) 234-6544
Fax: (317) 232-6749 attn: Brian Wright
E-mail: Bwright1@idem.IN.gov

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

For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Permit Guide on the Internet at: <http://www.in.gov/idem/5881.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

What will happen after IDEM makes a decision?

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

If you have any questions, please contact Brian Wright of my staff at the above address.



Nathan C. Bell, Section Chief
Permits Branch
Office of Air Quality



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Bruno L. Pigott
Commissioner

Mr. Tony Swihart
Patrick Industries, Inc. d/b/a Charleston Corporation
PO Box 5
Bremen, IN 46506

Re: 099-38057-00037
Significant Permit Modification to
Part 70 Renewal No.: T099-36353-00037

Dear Mr. Swihart:

Patrick Industries, Inc. d/b/a Charleston Corporation was issued Part 70 Operating Permit Renewal No. T099-36353-00037 on May 26, 2016 for a stationary miscellaneous fiberglass composite parts manufacturing operation located at 1849 and 1820 Dogwood Road, Bremen, Indiana 46506. An application requesting changes to this permit was received on December 27, 2016. Pursuant to the provisions of 326 IAC 2-7-12, a Significant Permit Modification to this permit is hereby approved as described in the attached Technical Support Document.

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

Attachment A: NESHAP for Reinforced Plastic Composites Production [40 CFR 63, Subpart WWWW]
Attachment B: NESHAP for Surface Coating of Plastic Parts and Products [40 CFR 63, Subpart PPPP]

Previously issued approvals for this source containing these attachments are available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>. 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/>. For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Permit Guide on the Internet at: <http://www.in.gov/idem/5881.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

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

If you have any questions on this matter, please contact Brian Wright, of my staff, OAQ, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana, 46204-2251 at 317-234-6544 or 1-800-451-6027, and ask for extension 4-6544.

Sincerely,

Nathan C. Bell, Section Chief
Permits Branch
Office of Air Quality

Attachments: Modified Permit and Technical Support Document

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



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Commissioner

Part 70 Operating Permit Renewal

OFFICE OF AIR QUALITY

Patrick Industries, Inc. d/b/a Charleston Corporation
1849 and 1820 Dogwood Road
Bremen, Indiana 46506

(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.: T099-36353-00037 | |
| Issued by: Original Signed Nathan Bell, Section Chief Permits Branch, Office of Air Quality | Issuance Date: May 26, 2016 Expiration Date: May 26, 2021 |

| | |
|---|---|
| Significant Permit Modification No.: 099-38057-00037 | |
| Issued by: Nathan C. Bell, Section Chief, Permits Branch Office of Air Quality | Issuance Date: Expiration Date: May 26, 2021 |

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

Attachment B: NESHAP for Surface Coating of Plastic Parts and Products [40 CFR 63, Subpart PPPP]

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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.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

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

The Permittee owns and operates a stationary miscellaneous fiberglass composite parts manufacturing operation.

| | |
|------------------------------|--|
| Source Address: | 1849 and 1820 Dogwood Road, Bremen, Indiana 46506 |
| General Source Phone Number: | 574-546-5222 |
| SIC Code: | 3714 |
| County Location: | Marshall |
| Source Location Status: | Attainment for all criteria pollutants |
| Source Status: | Part 70 Operating Permit Program Minor Source, under PSD and Emission Offset Rules Major Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories |

A.2 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:

- (a) Four (4) gel coat booths, identified as GC1, GC2, GC3 and GC4, constructed in 1966, each utilizing air assisted airless spray, each with a maximum capacity of sixteen (16) fiberglass parts per hour, each with dry filters for particulate control and each exhausting to one (1) stack, identified as S2, S3, S4 and S5, respectively.
- (b) Three (3) resin chop booths, identified as C1, C2 and C3, constructed in 1966, each utilizing non-atomized spray application system (Fluid Impingement Technology), each with a maximum capacity of sixteen (16) fiberglass parts per hour, each with dry filters for particulate matter overspray control and each exhausting to one (1) stack, identified as S1, S6 and S7, respectively.
- (c) Two (2) production gel coat booths, identified as GC5 and GC6, constructed in 2011, each utilizing air assisted airless spray, each with a maximum capacity of 0.5 fiberglass parts per hour, each using dry filters as particulate control and exhausting to stacks GC5S and GC6S, respectively.
- (d) One (1) tooling gel coat booth, identified as GC7, constructed in 2011, utilizing air assisted airless spray, with a maximum capacity of 0.006 fiberglass parts per hour, using dry filters as particulate control and exhausting to stack GC7S.
- (e) One (1) non-atomized production lamination area and catalyst usage area, identified as C4, constructed in 2011, utilizing non-atomized spray application system (Fluid Impingement Technology), with a maximum capacity of 0.5 fiberglass parts per hour, with emissions exhausting indoors.
- (f) One (1) non-atomized tooling resin booth, identified as C5, constructed in 2011, utilizing non-atomized spray application system (Fluid Impingement Technology), with a maximum capacity of 0.006 fiberglass parts per hour, using dry filters as particulate control and exhausting to stack C5S.

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- (g) Two (2) portable chop guns, identified as PC1 and PC2, constructed in 2011 and approved in 2016 for construction, respectively, utilizing non-atomized spray application system (Fluid Impingement Technology), with a combined maximum capacity of 0.5 fiberglass parts per hour, using dry filters as particulate control, and exhausting to the atmosphere.
- (h) Four (4) adhesive application and assembly stations used to assemble ABS and reinforced plastic composite parts, designated as ABS-AO, RPC-AO1, RPC-AO2, and 4V-AO, constructed in 1966, each applying adhesive manually with a caulk gun, with a combined capacity of sixteen (16) parts per hour, venting into the building.
- (i) Four (4) grinding booths, identified as G1, G2, G3, and G4, constructed in 1966, each with a maximum capacity of sixteen (16) fiberglass parts per hour, each with dry filters for particulate matter (PM) control, and each exhausting to one (1) stack, identified as S8, S9, S10, and S11 respectively.
- (j) One (1) production grinding room, identified as G5, constructed in 2011, with a maximum capacity of 0.554 tons/hr, using dry filter banks as control, and exhausting to stack G5S.
- (k) One (1) tooling shop grinding room, identified as G6, constructed in 2011, with a maximum capacity of 0.01 tons/hr, using dry filter banks as control and exhausting to stack G6S.
- (l) One (1) resin transfer molding operation, identified as RTM1, constructed in 2013, with a maximum capacity of 4.0 parts/hr, venting indoors.
- (m) One (1) mold preparation and cleanup operation, identified as RTMMP, constructed in 2013, with a maximum capacity of 4.0 parts/hr, venting indoors.

Under NESHAP WWWW, GC1, GC2, GC3, GC4, GC5, GC6, GC7, C1, C2, C3, C4, C5, PC1, PC2, RTM1 and RTMMP are considered existing affected sources.

Under NESHAP PPPP, ABS-AO, RPC-AO1 and RPC-AO2 are considered existing affected sources.

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

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

- (a) Natural gas-fired combustion air make-up units and heaters comprising:
 - (1) Two (2) Aerovent MAU heaters, each rated at 2.5 MMBtu per hour.
 - (2) One (1) Aerovent MAU heater, rated at 3.0 MMBtu per hour.
 - (3) One (1) Rheem heater, rated at 5.28 MMBtu per hour.
 - (4) Two (2) Thermo Cyclers, each rated at 0.4 MMBtu per hour.
 - (5) Four (4) radiant heaters, each rated at 0.1 MMBtu per hour.
 - (6) One (1) Rheem furnace, rated at 0.15 MMBtu per hour.
 - (7) One (1) Luxaire furnace, rated at 0.1 MMBtu per hour.
 - (8) One (1) Amana furnace, rated at 0.056 MMBtu per hour.
 - (9) Two (2) Beacon Morris furnaces, each rated at 0.075 MMBtu per hour.
 - (10) One (1) Modine furnace, rated at 0.10 MMBtu per hour.
 - (11) Five (5) natural gas fired radiant heaters, identified as MSRH1 through MSRH5, constructed in 2011, each with a maximum heat input rate of 0.1 MMBtu/hr, and exhausting to stacks MSRH1S and MSRH2S.

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- (12) One (1) natural gas fired air makeup unit, identified as MSAM1, constructed in 2011, with a maximum heat input rate of 2.2 MMBtu/hr and exhausting inside the building.
 - (13) Ten (10) radiant space heaters, identified as RH1 through RH10, constructed in 1988, each with a maximum heat input capacity of 0.10 MMBtu/hr, and exhausting indoors.
 - (14) One (1) forced air furnace, identified as OH1, constructed in 1988, with a heat input capacity of 0.10 MMBtu/hr, exhausting outdoors.
- (b) Closed loop heating and cooling systems.
 - (c) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
 - (d) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]
 - (e) Asbestos abatement projects regulated by 326 IAC 14-10.
 - (f) 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.
 - (g) Filter or coalescer media changeout.
 - (h) Emission units or activities whose potential uncontrolled particulate emissions are less than five (5) pounds per hour or twenty-five (25) pounds per day including the following:
 - (1) One (1) miscellaneous woodworking operation for tooling shop, identified as MWT, constructed in 2011, including one (1) belt sander (BTS1), one (1) vertical bandsaw (BS3) and one (1) CNC machine (CNC1), with a total maximum capacity of 7.13 lbs/hr, and exhausting inside the building.
 - (2) Three (3) MIG welding stations used for maintenance and mold making.
 - (3) Cutting equipment for a portion of the mold making operations comprising:
 - (A) Two (2) 10" table saws with no direct exhaust.
 - (B) Two (2) 10" radial arm saws with no direct exhaust.
 - (C) Two (2) band saws with no direct exhaust.
 - (4) One (1) ABS plastic regrinding machine, identified as PLG1, approved for construction in 2016, with a maximum capacity of 0.188 tons/hr, controlled by dry filters, exhausting inside the building. [326 IAC 6-3]
 - (i) Emission units or activities whose potential uncontrolled VOC emissions are less than three (3) pounds per hour or fifteen (15) pounds per day including the following:
 - (1) One (1) resin storage tank, identified as T1, constructed in 1966, with a maximum storage capacity of 6,000 gallons, and exhausting to stack TV1. [326 IAC 20-48, 326 IAC 20-56]
 - (2) One (1) polyester resin storage tank, identified as T2, constructed in 2011, with a maximum storage capacity of 6,000 gallons, and exhausting to stack TV2. [326 IAC 20-48, 326 IAC 20-56]
 - (3) Two (2) polyester resin storage tanks, identified as T3 and T4, constructed in 2011 and permitted in 2016, each with a maximum storage capacity of 5581.45

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gallons, and exhausting to stack TV3 and TV4, respectively. [326 IAC 20-48, 326 IAC 20-56]

Under NESHAP WWWW, T1, T2, T3, and T4 are considered existing affected sources.

- (4) Final finish repair of fiberglass using a non-atomized application method.
- (5) Mold marking paint.
- (6) Miscellaneous fillers and sealants usage using a non-atomized application method.
- (7) Vacuum forming plastics department.
- (8) One (1) 35 gallon capacity acetone recycling unit.
- (9) One (1) spray core applicator, identified as SC1, constructed in 2015, utilizing non-atomized spray application system (Fluid Impingement Technology), with a maximum capacity of 0.006 reinforced plastic composite molds per hour, uncontrolled, and exhausting inside the building. [326 IAC 20-48, 326 IAC 20-56]

Under NESHAP WWWW, SC1 is considered an existing affected source.

- (j) One fiberglass final finish area, identified as FFSS, approved in 2017 for construction, with a maximum capacity of 2052 pounds per hour of fiberglass, consisting of ten (10) grinders/sanders, each exhausting to dust collector DC1 as particulate control, and exhausting to stack DC1-S. [326 IAC 6-3-2]

A.4 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).

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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, T099-36353-00037, 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.

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B.8 Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]

- (a) A certification required by this permit meets the requirements of 326 IAC 2-7-6(1) if:
- (1) it contains a certification by a "responsible official" as defined by 326 IAC 2-7-1(35), and
 - (2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) A "responsible official" is defined at 326 IAC 2-7-1(35).

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

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

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

and

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

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
- (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

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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).

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- (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.

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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

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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 T099-36353-00037 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 combined permit, all previous registrations and permits are superseded by this combined new source review and 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).

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- (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.

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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

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

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

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

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

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(37)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:
 - (1) A brief description of the change within the source;
 - (2) The date on which the change will occur;
 - (3) Any change in emissions; and
 - (4) Any permit term or condition that is no longer applicable as a result of the change.

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

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.20 Source Modification Requirement [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2.

B.21 Inspection and Entry [326 IAC 2-7-6][IC 13-14-2-2][IC 13-30-3-1][IC 13-17-3-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as

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such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.22 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

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

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

- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

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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.

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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 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

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- (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(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

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

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (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.7 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

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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.8 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.9 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) For monitoring required by CAM, at all times, the Permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

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- (d) For monitoring required by CAM, except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the Permittee shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

C.10 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.11 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.12 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.13 Response to Excursions or Exceedances [40 CFR 64][326 IAC 3-8][326 IAC 2-7-5][326 IAC 2-7-6]

- (l) 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;

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- (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.
- (II)
 - (a) *CAM Response to excursions or exceedances.*
 - (1) Upon detecting an excursion or exceedance, subject to CAM, the Permittee shall restore operation of the pollutant-specific emissions unit (including the 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 emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
 - (2) 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, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.
 - (b) If the Permittee identifies a failure to achieve compliance with an emission limitation, subject to CAM, or standard, subject to CAM, for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the Permittee shall promptly notify the IDEM, OAQ and, if necessary, submit a proposed significant permit modification to this permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the

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frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

- (c) Based on the results of a determination made under paragraph (II)(a)(2) of this condition, the EPA or IDEM, OAQ may require the Permittee to develop and implement a Quality Improvement Plan (QIP). The Permittee shall develop and implement a QIP if notified to in writing by the EPA or IDEM, OAQ.
- (d) Elements of a QIP:
The Permittee shall maintain a written QIP, if required, and have it available for inspection. The plan shall conform to 40 CFR 64.8 b (2).
- (e) If a QIP is required, the Permittee shall develop and implement a QIP as expeditiously as practicable and shall notify the IDEM, OAQ if the period for completing the improvements contained in the QIP exceeds 180 days from the date on which the need to implement the QIP was determined.
- (f) Following implementation of a QIP, upon any subsequent determination pursuant to paragraph (II)(c) of this condition the EPA or the IDEM, OAQ may require that the Permittee make reasonable changes to the QIP if the QIP is found to have:
 - (1) Failed to address the cause of the control device performance problems; or
 - (2) Failed to provide adequate procedures for correcting control device performance problems as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
- (g) Implementation of a QIP shall not excuse the Permittee from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting or recordkeeping requirement that may apply under federal, state, or local law, or any other applicable requirements under the Act.
- (h) *CAM recordkeeping requirements.*
 - (1) The Permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to paragraph (II)(c) of this condition and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under this condition (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions). Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.
 - (2) Instead of paper records, the owner or operator may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review, and does not conflict with other applicable recordkeeping requirements

C.14 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

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

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

- (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
- (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(33) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

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

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

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

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

- (AA) The date, place, as defined in this permit, and time of sampling or measurements.
- (BB) The dates analyses were performed.
- (CC) The company or entity that performed the analyses.
- (DD) The analytical techniques or methods used.
- (EE) The results of such analyses.
- (FF) The operating conditions as existing at the time of sampling or measurement.

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

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

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before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

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

Stratospheric Ozone Protection

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

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

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SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) Four (4) gel coat booths, identified as GC1, GC2, GC3 and GC4, constructed in 1966, each utilizing air assisted airless spray, each with a maximum capacity of sixteen (16) fiberglass parts per hour, each with dry filters for particulate control and each exhausting to one (1) stack, identified as S2, S3, S4 and S5, respectively.
- (b) Three (3) resin chop booths, identified as C1, C2 and C3, constructed in 1966, each utilizing non-atomized spray application system (Fluid Impingement Technology), each with a maximum capacity of sixteen (16) fiberglass parts per hour, each with dry filters for particulate matter overspray control and each exhausting to one (1) stack, identified as S1, S6 and S7, respectively.
- (c) Two (2) production gel coat booths, identified as GC5 and GC6, constructed in 2011, each utilizing air assisted airless spray, each with a maximum capacity of 0.5 fiberglass parts per hour, each using dry filters as particulate control and exhausting to stacks GC5S and GC6S, respectively.
- (d) One (1) tooling gel coat booth, identified as GC7, constructed in 2011, utilizing air assisted airless spray, with a maximum capacity of 0.006 fiberglass parts per hour, using dry filters as particulate control and exhausting to stack GC7S.
- (e) One (1) non-atomized production lamination area and catalyst usage area, identified as C4, constructed in 2011, utilizing non-atomized spray application system (Fluid Impingement Technology), with a maximum capacity of 0.5 fiberglass parts per hour, with emissions exhausting indoors.
- (f) One (1) non-atomized tooling resin booth, identified as C5, constructed in 2011, utilizing non-atomized spray application system (Fluid Impingement Technology), with a maximum capacity of 0.006 fiberglass parts per hour, using dry filters as particulate control and exhausting to stack C5S.
- (g) Two (2) portable chop guns, identified as PC1 and PC2, constructed in 2011 and approved in 2016 for construction, respectively, utilizing non-atomized spray application system (Fluid Impingement Technology), with a combined maximum capacity of 0.5 fiberglass parts per hour, using dry filters as particulate control, and exhausting to the atmosphere.
- (l) One (1) resin transfer molding operation, identified as RTM1, constructed in 2013, with a maximum capacity of 4.0 parts/hr, venting indoors.
- (m) One (1) mold preparation and cleanup operation, identified as RTMMP, constructed in 2013, with a maximum capacity of 4.0 parts/hr, venting indoors.

Under NESHAP WWWW, GC1, GC2, GC3, GC4, GC5, GC6, GC7, C1, C2, C3, C4, C5, PC1, PC2, RTM1 and RTMMP are considered existing affected sources.

Emissions Unit Description: Insignificant Activities

- (i) Emission units or activities whose potential uncontrolled VOC emissions are less than three (3) pounds per hour or fifteen (15) pounds per day including the following:
 - (1) One (1) resin storage tank, identified as T1, constructed in 1966, with a maximum storage capacity of 6,000 gallons, and exhausting to stack TV1. [326 IAC 20-48, 326 IAC 20-56]

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- (2) One (1) polyester resin storage tank, identified as T2, constructed in 2011, with a maximum storage capacity of 6,000 gallons, and exhausting to stack TV2. [326 IAC 20-48, 326 IAC 20-56]
- (3) Two (2) polyester resin storage tanks, identified as T3 and T4, constructed in 2011 and permitted in 2016, each with a maximum storage capacity of 5581.45 gallons, and exhausting to stack TV3 and TV4, respectively. [326 IAC 20-48, 326 IAC 20-56]

Under NESHAP WWWW, T1, T2, T3, and T4 are considered existing affected sources.

- (9) One (1) spray core applicator, identified as SC1, constructed in 2015, utilizing non-atomized spray application system (Fluid Impingement Technology), with a maximum capacity of 0.006 reinforced plastic composite molds per hour, uncontrolled, and exhausting inside the building. [326 IAC 20-48, 326 IAC 20-56]

Under NESHAP WWWW, SC1 is considered an existing affected source.

(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 PSD Minor VOC Limit [326 IAC 2-2]

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

The total volatile organic compounds (VOCs) input to the seven (7) gel coat booths (GC1 through GC7), five (5) resin chop booths (C1 through C5), two (2) portable chop guns (PC1 and PC2), resin transfer molding (RTM1), and mold preparation and cleanup operations (RTMMP) shall be less than 227.00 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

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

D.1.2 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 subsection (b) are maintained, all personnel shall be given refresher training annually.
 - (3) Personnel who have been trained by another owner or operator subject to this rule are exempt from paragraph (1) if written documentation that the employee's training is current is provided to the new employer.

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

Pursuant to 326 IAC 6-3-2(d), particulate from the from four (4) gel coat booths (GC1 through GC4) and the two (2) production gel coat booths (GC5 and GC6) shall be controlled by dry particulate filters and the Permittee shall operate the control device in accordance with manufacturer's specifications.

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

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

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

D.1.5 Volatile Organic Compounds (VOC) [326 IAC 8-1-4][326 IAC 8-1-2(a)]

Compliance with the VOC input limitation contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by obtaining from the manufacturer the copies of the Material Data Safety Sheets (MSDS) or Certified Product Data Sheets (CPDS) that indicate the VOC content of each material and using the CFA Unified Emissions Factors. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

D.1.6 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters associated with the gel coat booths (GC1 through GC7). To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the gel coat booth stacks (S2, S3, S4, S5, GC5S, GC6S, and GC7S) 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 steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the

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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 gel coat emissions from the stacks 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 or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

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

D.1.7 Record Keeping Requirements

- (a) To document the compliance status with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC input limit established in Condition D.1.1. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
 - (1) The VOC content of each gel coat materials, resins and solvents used.
 - (2) The amount of gel coat materials, resins and solvent used on monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (3) The total VOC input for each month; and
 - (4) The total VOC input for each compliance period.
- (b) To document the compliance status with Condition D.1.6, the Permittee shall maintain a log of weekly and monthly overspray observations, daily inspections of the filters.
- (c) Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to the records required by this condition.

D.1.8 Reporting Requirements

A quarterly report of the information to document the compliance status with Condition D.1.1 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 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).

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SECTION D.2 FACILITY OPERATION CONDITIONS

Emissions Unit Description [326 IAC 2-7-5(14)]:

- (i) Four (4) grinding booths, identified as G1, G2, G3, and G4, constructed in 1966, each with a maximum capacity of sixteen (16) fiberglass parts per hour, each with dry filters for particulate matter (PM) control, and each exhausting to one (1) stack, identified as S8, S9, S10, and S11 respectively.
- (j) One (1) production grinding room, identified as G5, constructed in 2011, with a maximum capacity of 0.554 tons/hr, using dry filter banks as control, and exhausting to stack G5S.
- (k) One (1) tooling shop grinding room, identified as G6, constructed in 2011, with a maximum capacity of 0.01 tons/hr, using dry filter banks as control and exhausting to stack G6S.

Emissions Unit Description: Insignificant Activities

- (h) Emission units or activities whose potential uncontrolled particulate emissions are less than five (5) pounds per hour or twenty-five (25) pounds per day including the following:
 - (4) One (1) ABS plastic regrinding machine, identified as PLG1, approved for construction in 2016, with a maximum capacity of 0.188 tons/hr, controlled by dry filters, exhausting inside the building. [326 IAC 6-3]
- (j) One fiberglass final finish area, identified as FFSS, approved in 2017 for construction, with a maximum capacity of 2052 pounds per hour of fiberglass, consisting of ten (10) grinders/sanders, each exhausting to dust collector DC1 as particulate control, and exhausting to stack DC1-S. [326 IAC 6-3-2]

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

- (a) Pursuant to 326 IAC 6-3-2(e)(2), the particulate emissions from the Tooling Shop Grinding Room (G6) shall not exceed 0.551 pound per hour.
- (b) Pursuant to 326 IAC 6-3-2, the particulate emissions from each of the following processes shall not exceed the pound per hour limitations specified in the following table:

| Emissions Unit | Control | Maximum Process Weight Rate (tons/hour) | 326 IAC 6-3-2 Allowable Particulate Emission Rate (lbs/hr) |
|---------------------------------------|-------------|---|--|
| ABS Plastic Regrinding Machine (PLG1) | Dry Filters | 0.188 | 1.34 |
| Grinding Booth (G1) | Dry Filters | 0.258 | 1.65 |
| Grinding Booth (G2) | Dry Filters | 0.258 | 1.65 |
| Grinding Booth (G3) | Dry Filters | 0.258 | 1.65 |
| Grinding Booth (G4) | Dry Filters | 0.258 | 1.65 |

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| Emissions Unit | Control | Maximum Process Weight Rate (tons/hour) | 326 IAC 6-3-2 Allowable Particulate Emission Rate (lbs/hr) |
|--|------------------|---|--|
| Production Grinding Room (G5) | Dry Filter Banks | 0.554 | 2.76 |
| Grinders for Final Finishing Area (FFSS) | Dust Collector | 0.1026 (each) | 0.89 |

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

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

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

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

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

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

D.2.3 Particulate Control

- (a) In order to comply with condition D.2.1, the filters for particulate control shall be in operation and control emissions from the five (5) grinding booths (G1, G2, G3, G4 and G6) at all times that the facilities are in operation.
- (b) In order to comply with condition D.2.1, the dust collector (DC1) for particulate control shall be in operation and control emissions from the final finishing area (FFSS) at all times that the facilities are in operation.

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SECTION E.1

NESHAP

Emissions Unit Description:

- (a) Four (4) gel coat booths, identified as GC1, GC2, GC3 and GC4, constructed in 1966, each utilizing air assisted airless spray, each with a maximum capacity of sixteen (16) fiberglass parts per hour, each with dry filters for particulate control and each exhausting to one (1) stack, identified as S2, S3, S4 and S5, respectively.
- (b) Three (3) resin chop booths, identified as C1, C2 and C3, constructed in 1966, each utilizing non-atomized spray application system (Fluid Impingement Technology), each with a maximum capacity of sixteen (16) fiberglass parts per hour, each with dry filters for particulate matter overspray control and each exhausting to one (1) stack, identified as S1, S6 and S7, respectively.
- (c) Two (2) production gel coat booths, identified as GC5 and GC6, constructed in 2011, each utilizing air assisted airless spray, each with a maximum capacity of 0.5 fiberglass parts per hour, each using dry filters as particulate control and exhausting to stacks GC5S and GC6S, respectively.
- (d) One (1) tooling gel coat booth, identified as GC7, constructed in 2011, utilizing air assisted airless spray, with a maximum capacity of 0.006 fiberglass parts per hour, using dry filters as particulate control and exhausting to stack GC7S.
- (e) One (1) non-atomized production lamination area and catalyst usage area, identified as C4, constructed in 2011, utilizing non-atomized spray application system (Fluid Impingement Technology), with a maximum capacity of 0.5 fiberglass parts per hour, with emissions exhausting indoors.
- (f) One (1) non-atomized tooling resin booth, identified as C5, constructed in 2011, utilizing non-atomized spray application system (Fluid Impingement Technology), with a maximum capacity of 0.006 fiberglass parts per hour, using dry filters as particulate control and exhausting to stack C5S.
- (g) Two (2) portable chop guns, identified as PC1 and PC2, constructed in 2011 and approved in 2016 for construction, respectively, utilizing non-atomized spray application system (Fluid Impingement Technology), with a combined maximum capacity of 0.5 fiberglass parts per hour, using dry filters as particulate control, and exhausting to the atmosphere.
- (l) One (1) resin transfer molding operation, identified as RTM1, constructed in 2013, with a maximum capacity of 4.0 parts/hr, venting indoors.
- (m) One (1) mold preparation and cleanup operation, identified as RTMMP, constructed in 2013, with a maximum capacity of 4.0 parts/hr, venting indoors.

Under NESHAP WWW, GC1, GC2, GC3, GC4, GC5, GC6, GC7, C1, C2, C3, C4, C5, PC1, PC2, RTM1 and RTMMP are considered existing affected sources.

Emissions Unit Description: Insignificant Activities

- (i) Emission units or activities whose potential uncontrolled VOC emissions are less than three (3) pounds per hour or fifteen (15) pounds per day including the following:
 - (1) One (1) resin storage tank, identified as T1, constructed in 1966, with a maximum storage capacity of 6,000 gallons, and exhausting to stack TV1. [326 IAC 20-48, 326 IAC 20-56]

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- (2) One (1) polyester resin storage tank, identified as T2, constructed in 2011, with a maximum storage capacity of 6,000 gallons, and exhausting to stack TV2. [326 IAC 20-48, 326 IAC 20-56]
- (3) Two (2) polyester resin storage tanks, identified as T3 and T4, constructed in 2011 and permitted in 2016, each with a maximum storage capacity of 5581.45 gallons, and exhausting to stack TV3 and TV4, respectively. [326 IAC 20-48, 326 IAC 20-56]

Under NESHAP WWWW, T1, T2, T3, and T4 are considered existing affected sources.

- (9) One (1) spray core applicator, identified as SC1, constructed in 2015, utilizing non-atomized spray application system (Fluid Impingement Technology), with a maximum capacity of 0.006 reinforced plastic composite molds per hour, uncontrolled, and exhausting inside the building. [326 IAC 20-48, 326 IAC 20-56]

Under NESHAP WWWW, SC1 is considered an existing affected source.

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

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

E.1.1 General Provisions Relating to NESHAP [326 IAC 20-1][40 CFR Part 63, Subpart A]

- (a) Pursuant to 40 CFR 63.5925, 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, as specified in Table 15 of 40 CFR Part 63, Subpart WWWW in accordance with schedule in 40 CFR 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 National Emission Standards for Hazardous Air Pollutants (NESHAP) for Reinforced Plastic Composites Production [40 CFR Part 63, Subpart WWWW] [326 IAC 20-56]

The Permittee which engages in reinforced plastic composites production 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 units listed in this section:

- (a) 40 CFR 63.5780;
(b) 40 CFR 63.5785;
(c) 40 CFR 63.5790;
(d) 40 CFR 63.5795;
(e) 40 CFR 63.5796;
(f) 40 CFR 63.5797;
(g) 40 CFR 63.5798;
(h) 40 CFR 63.5799(b), (c);
(i) 40 CFR 63.5800;
(j) 40 CFR 63.5805(b), (g);
(k) 40 CFR 63.5810(a), (b), (c), (d);

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- (l) 40 CFR 63.5835(a), (c);
- (m) 40 CFR 63.5840;
- (n) 40 CFR 63.5860(a);
- (o) 40 CFR 63.5895(b), (c), (d);
- (p) 40 CFR 63.5900(a)(2), (a)(3), (a)(4), (b), (c), (e);
- (q) 40 CFR 63.5905;
- (r) 40 CFR 63.5910(a), (b), (c), (d), (e), (g), (h);
- (s) 40 CFR 63.5915(a), (c), (d);
- (t) 40 CFR 63.5920;
- (u) 40 CFR 63.5925;
- (v) 40 CFR 63.5930;
- (w) 40 CFR 63.5935;
- (x) Table 1 to 40 CFR 63 Subpart WWWW;
- (y) Table 2 to 40 CFR 63 Subpart WWWW;
- (z) Table 3 to 40 CFR 63 Subpart WWWW;
- (aa) Table 4 to 40 CFR 63 Subpart WWWW;
- (bb) Table 6 to 40 CFR 63 Subpart WWWW;
- (cc) Table 7 to 40 CFR 63 Subpart WWWW;
- (dd) Table 8 to 40 CFR 63 Subpart WWWW;
- (ee) Table 9 to 40 CFR 63 Subpart WWWW;
- (ff) Table 13 to 40 CFR 63 Subpart WWWW;
- (gg) Table 14 to 40 CFR 63 Subpart WWWW; and
- (hh) Table 15 to 40 CFR 63 Subpart WWWW.

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SECTION E.2

NESHAP

Facility Description [326 IAC 2-7-5(14)]

- (h) Four (4) adhesive application and assembly stations used to assemble ABS and reinforced plastic composite parts, designated as ABS-AO, RPC-AO1, RPC-AO2, and 4V-AO, constructed in 1966, each applying adhesive manually with a caulk gun, with a combined capacity of sixteen (16) parts per hour, venting into the building.

Under NESHAP, Subpart PPPP, ABS-AO, RPC-AO1 and RPC-AO2 are considered existing affected sources.

(The information describing the process contained in this facility 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.2.1 General Provisions Relating to NESHAP PPPP [326 IAC 20-1][40 CFR Part 63, Subpart A]

- (a) Pursuant to 40 CFR 63.4501, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 20-1-1 for ABS-AO, RPC-AO1 and RPC-AO2, as specified in Table 2 of 40 CFR Part 63, Subpart PPPP in accordance with the schedule in 40 CFR 63 Subpart PPPP.

- (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.2.2 National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Plastic Parts and Products [40 CFR Part 63, Subpart PPPP][326 IAC 20-81]

The Permittee which engages in surface coating of plastic parts and products shall comply with the following provisions of 40 CFR Part 63, Subpart PPPP (included as Attachment B to the operating permit), which are incorporated by reference as 326 IAC 20-81, for the emission units listed in this section:

- (a) 40 CFR 63.4481;
- (b) 40 CFR 63.4482;
- (c) 40 CFR 63.4483(b);
- (d) 40 CFR 63.4490(b)(1);
- (e) 40 CFR 63.4491(a), (b);
- (f) 40 CFR 63.4492(a);
- (g) 40 CFR 63.4493(a);
- (h) 40 CFR 63.4500(a)(1), (b);
- (i) 40 CFR 63.4501;
- (j) 40 CFR 63.4510, except 40 CFR 63.4510(c)(8)(iii), (9), (10), (11);
- (k) 40 CFR 63.4520, except 40 CFR 63.4520(a)(7), (b), (c);
- (l) 40 CFR 63.4530, except 40 CFR 63.4530(c)(4), (i);
- (m) 40 CFR 63.4531;
- (n) 40 CFR 63.4540;
- (o) 40 CFR 63.4541;
- (p) 40 CFR 63.4542;

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- (q) 40 CFR 63.4550;
- (r) 40 CFR 63.4551;
- (s) 40 CFR 63.4552;
- (t) 40 CFR 63.4580;
- (u) 40 CFR 63.4581;
- (v) Table 2 to 40 CFR 63 Subpart PPPP;
- (w) Table 3 to 40 CFR 63 Subpart PPPP; and
- (x) Table 4 to 40 CFR 63 Subpart PPPP.

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

Source Name: Patrick Industries, Inc. d/b/a Charleston Corporation
Source Address: 1849 and 1820 Dogwood Road, Bremen, Indiana 46506
Part 70 Permit No.: T099-36353-00037

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

Please check what document is being certified:

- Annual Compliance Certification Letter
- Test Result (specify) _____.
- Report (specify) _____.
- Notification (specify) _____.
- Affidavit (specify) _____.
- Other (specify) _____.

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

Signature:

Printed Name:

Title/Position:

Phone:

Date:

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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: Patrick Industries, Inc. d/b/a Charleston Corporation
Source Address: 1849 and 1820 Dogwood Road, Bremen, Indiana 46506
Part 70 Permit No.: T099-36353-00037

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: |

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Page 2 of 2

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

| |
|---|
| 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: _____

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

Part 70 Quarterly Report

Source Name: Patrick Industries, Inc. d/b/a Charleston Corporation
Source Address: 1849 and 1820 Dogwood Road, Bremen, Indiana 46506
Part 70 Permit No.: T099-36353-00037
Facility: Seven (7) gel coat booths (GC1 through GC7), and five (5) resin chop booths (C1, C2, C3, C4 and C5), and two (2) portable chop guns (PC1 and PC2)
Parameter: VOC Emissions
Limit: The total volatile organic compounds (VOCs) input to the seven (7) gel coat booths (GC1 through GC7), five (5) resin chop booths (C1 through C5), two (2) portable chop guns (PC1 and PC2), resin transfer molding (RTM1), and mold preparation and cleanup operations (RTMMP) shall be less than 227.00 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

QUARTER: _____ YEAR: _____

| Month | Column 1 | Column 2 | Column 1 + Column 2 |
|-------|-----------------------------------|---|---------------------------------------|
| | VOC Input This Month (tons) | VOC Input Previous 11 Months (tons) | VOC Input 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: _____

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**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Patrick Industries, Inc. d/b/a Charleston Corporation
Source Address: 1849 and 1820 Dogwood Road, Bremen, Indiana 46506
Part 70 Permit No.: T099-36353-00037

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> | |
| <input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD. | |
| <input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD | |
| 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: | |

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| | |
|--|-------------------------------|
| 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 Significant Permit Modification**

Source Description and Location

| | |
|---|--|
| Source Name: | Patrick Industries, Inc. d/b/a Charleston Corporation |
| Source Location: | 1849 and 1820 Dogwood Road, Bremen, Indiana 46506 |
| County: | Marshall |
| SIC Code: | 3714 (Motor Vehicle Parts and Accessories) |
| Operation Permit No.: | T 099-36353-00037 |
| Operation Permit Issuance Date: | May 26, 2016 |
| Minor Source Modification No.: | 099-38035-00037 |
| Significant Permit Modification No.: | 099-38057-00037 |
| Permit Reviewer: | Brian Wright |

Source Definition

This stationary miscellaneous fiberglass composite parts and watercraft components manufacturing operation consisted of two (2) plants:

- (1) Charleston Corporation (source number 099-00037) located at 1849A Dogwood Road, Bremen, Indiana; and
- (2) 1820 Dogwood Road, Bremen, Indiana

In order to consider the plants as one major source, all three of the following criteria had to have been met:

- (1) The plants must have common ownership or common control;
- (2) The plants must have the same two digit SIC code or a support relationship; and
- (3) The plants must be located on contiguous or adjacent properties.

IDEM has determined that these plants are one major source based on the fact that both properties are owned by the same person or persons; the plants have the same two-digit Standard Industrial Classification (SIC) Code (37 - Transportation Equipment), and the plants are located on contiguous properties separated by a right-of-way. Therefore, based on this evaluation, these plants are considered one (1) major source, as defined by 326 IAC 2-7-1(22).

Existing Approvals

The source was issued Part 70 Operating Permit Renewal No. T099-36353-00037 on May 26, 2016. There have been no subsequent approvals issued.

County Attainment Status

The source is located in Marshall County.

| Pollutant | Designation |
|--|--|
| SO ₂ | Better than national standards. |
| CO | Unclassifiable or attainment effective November 15, 1990. |
| O ₃ | Unclassifiable or attainment effective July 20, 2012, for the 2008 8-hour ozone standard. ¹ |
| PM _{2.5} | Unclassifiable or attainment effective April 5, 2005, for the annual PM _{2.5} standard. |
| PM _{2.5} | Unclassifiable or attainment effective December 13, 2009, for the 24-hour PM _{2.5} standard. |
| PM ₁₀ | Unclassifiable effective November 15, 1990. |
| NO ₂ | Cannot be classified or better than national standards. |
| Pb | Unclassifiable or attainment effective December 31, 2011. |
| ¹ Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005. | |

- (a) **Ozone Standards**
 Volatile organic compounds (VOC) and Nitrogen Oxides (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. Marshall County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) **PM_{2.5}**
 Marshall 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 for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) **Other Criteria Pollutants**
 Marshall 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.

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:

| Process / Emission Unit | Source-Wide Emissions Before Modification (ton/year) | | | | | | | | | |
|-----------------------------|--|------------------|-------------------|-----------------|-----------------|--------|------|------|---------------|---------------|
| | PM | PM ₁₀ | PM _{2.5} | SO ₂ | NO _x | VOC | CO | Pb | Single HAP* | Combined HAPs |
| Total for Source | 88.65 | 89.12 | 89.12 | 0.05 | 8.25 | 248.58 | 6.93 | 0.00 | 577.8 Styrene | 655.3 |
| PSD Major Source Thresholds | 250 | 250 | 250 | 250 | 250 | 250 | 250 | 5 | -- | -- |

*Single highest source-wide HAP.

- (a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no PSD regulated pollutant is emitted at a rate of two hundred fifty (250) tons per year or more and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1).
- (b) This existing source is a major source of HAPs, 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. Therefore, this source is a major source under Section 112 of the Clean Air Act (CAA).
- (c) These emissions are based on the TSD of Part 70 Operating Permit Renewal No. T099-36353-00037, issued on May 26, 2016.

Description of Proposed Modification

The Office of Air Quality (OAQ) has reviewed an application, submitted by Patrick Industries, Inc. d/b/a Charleston Corporation on December 27, 2016, relating to the construction and operation of a new fiberglass finishing area. The following is the proposed emission unit and pollution control device:

- (a) One fiberglass final finish area, identified as FFSS, approved in 2017 for construction, with a maximum capacity of 2052 pounds per hour of fiberglass, consisting of ten (10) grinders/sanders, each exhausting to dust collector DC1 as particulate control, and exhausting to stack DC1-S.

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 and 326 IAC 2-7-11. This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit. If the control equipment has been determined to be integral, the table reflects the 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} | SO ₂ | NO _x | VOC | CO | Single HAP | Combined HAPs |
| Final Finish Area (FFSS) | 11.04 | 11.04 | 11.04 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Total: | 11.04 | 11.04 | 11.04 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |

Appendix A of this TSD reflects the unrestricted 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 PM₁₀ and direct PM_{2.5} 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(d)(1), this change to the permit is being made through a Significant Permit Modification because this modification does not qualify as a Minor Permit Modification or as an Administrative Amendment.

Permit Level Determination – PSD or Emission Offset

The table below summarizes the potential to emit of the modification, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of the Part 70 source and permit modification, and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

| Process / Emission Unit | Project Emissions (ton/year) | | | | | | |
|-------------------------------|------------------------------|------------------|---------------------|-----------------|-----------------|-------------|-------------|
| | PM | PM ₁₀ | PM _{2.5} * | SO ₂ | NO _x | VOC | CO |
| Final Finish Area (FFSS) | 11.04 | 11.04 | 11.04 | 0.00 | 0.00 | 0.00 | 0.00 |
| Total for Modification | 11.04 | 11.04 | 11.04 | 0.00 | 0.00 | 0.00 | 0.00 |
| PSD Major Source Thresholds | 250 | 250 | 250 | 250 | 250 | 250 | 250 |
| Significant Levels | 25 | 15 | 10 | 40 | 40 | 40 | 100 |

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

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

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):

- (b) 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 existing 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.
- (c) Pursuant to 40 CFR 64.2(b)(1)(iii), Acid Rain requirements pursuant to Sections 404, 405, 406, 407(a), 407(b), or 410 of the Clean Air Act are exempt emission limitations or standards. Therefore, CAM was not evaluated for emission limitations or standards for SO₂ and NO_x under the Acid Rain Program.
- (d) Pursuant to 40 CFR 64.3(d), if a continuous emission monitoring system (CEMS) is required pursuant to other federal or state authority, the owner or operator shall use the CEMS to satisfy the requirements of CAM according to the criteria contained in 40 CFR 64.3(d).

The following table is used to identify the applicability of CAM to each existing 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) |
|--|--------------------|--------------------------------|------------------------------|----------------------------|----------------------|------------------|
| Final Finish Area (FFSS)/PM10 and PM2.5 | Dust Collector DC1 | 326 IAC 6-3-2 | 11.04 | 0.11 | N | N |
| Uncontrolled PTE (tpy) and controlled PTE (tpy) are evaluated against the Major Source Threshold for each pollutant. Major Source Threshold for criteria pollutants (PM10, PM2.5, SO2, NOX, VOC and CO) is 100 tpy, for a single HAP ten (10) tpy, and for total HAPs twenty-five (25) tpy. Under the Part 70 Permit program (40 CFR 70), PM is not a regulated pollutant. | | | | | | |
| 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. | | | | | | |
| CAM does not apply for PM10 and PM2.5 because the uncontrolled PTE of PM10 and PM2.5 is each less than the major source threshold. | | | | | | |
| Emission units without air pollution controls are not subject to CAM. Therefore, they are not listed. | | | | | | |

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

State Rule Applicability Determination

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

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

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

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

The operation of final finishing area (FFSS) will emit less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year for a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 2-6 (Emission Reporting)

Since this source is required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program, this source is subject to 326 IAC 2-6 (Emission Reporting). In accordance with the compliance schedule in 326 IAC 2-6-3, an emission statement must be submitted triennially. The first report is due no later than July 1, 2019, and subsequent reports are due every three (3) years thereafter. 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 12 (New Source Performance Standards)

See Federal Rule Applicability Section of this TSD.

326 IAC 20 (Hazardous Air Pollutants)

See Federal Rule Applicability Section of this TSD.

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 each of the grinding units of the final finishing area (FFSS), since each is a manufacturing process not exempted from this rule under 326 IAC 6-3-1(b) and is 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 grinders (FFSS) shall not exceed 0.89 pounds per hour when operating at a process weight rate of 0.1026 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:

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

The dust collector (DC1) shall be in operation at all times the final finishing areas (FFSS) is in operation, in order to comply with this limit.

Compliance Determination and Monitoring Requirements

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

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

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

Proposed Changes

The following changes listed below are due to the proposed modification. Deleted language appears as ~~strikethrough~~ text and new language appears as **bold** text:

(1) Section A.3 has been amended as follows in order to incorporate the new units:

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

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

(j) One fiberglass final finish area, identified as FFSS, approved in 2017 for construction, with a maximum capacity of 2052 pounds per hour of fiberglass, consisting of ten (10) grinders/sanders, each exhausting to dust collector DC1 as particulate control, and exhausting to stack DC1-S. [326 IAC 6-3-2]

(2) Section D.2 has been amended as follows in order to incorporate the new units and applicable rule and compliance monitoring requirements:

SECTION D.2 FACILITY OPERATION CONDITIONS

Emissions Unit Description: Insignificant Activities

(j) One fiberglass final finish area, identified as FFSS, approved in 2017 for construction, with a maximum capacity of 2052 pounds per hour of fiberglass, consisting of ten (10) grinders/sanders, each exhausting to dust collector DC1 as particulate control, and exhausting to stack DC1-S. [326 IAC 6-3-2]

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

- (b) Pursuant to 326 IAC 6-3-2, the particulate emissions from each of the following processes shall not exceed the pound per hour limitations specified in the following table:

| Emissions Unit | Control | Maximum Process Weight Rate (tons/hour) | 326 IAC 6-3-2 Allowable Particulate Emission Rate (lbs/hr) |
|---|-----------------------|---|--|
| ***** | ***** | ***** | ***** |
| Grinders for Final Finishing Area (FFSS) | Dust Collector | 0.1026 (each) | 0.89 |

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

D.2.3 Particulate Control

- (a) In order to comply with condition D.2.1, the filters for particulate control shall be in operation and control emissions from the five (5) grinding booths (G1, G2, G3, G4 and G6) at all times that the facilities are in operation.
- (b) **In order to comply with condition D.2.1, the dust collector (DC1) for particulate control shall be in operation and control emissions from the final finishing area (FFSS) at all times that the facilities are in operation.**

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 December 27, 2016.

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Minor Source Modification No. 099-38035-00037. The operation of this proposed modification shall be subject to the conditions of the attached Significant Permit Modification.

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

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Permit Writer at the 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) 234-6544 or toll free at 1-800-451-6027, extension 4-6544.
- (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 Permit Guide on the Internet at: <http://www.in.gov/idem/5881.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

**Appendix A: Emission Calculations
Emissions Summary**

Company Name: Patrick Industries, Inc. d/b/a Charleston Corporation
Source Address: 1849 and 1820 Dogwood Road, Bremen, Indiana 46506
MSM and SPM No. 099-38035-00037 and 099-38057-00037
Permit Reviewer: Brian Wright

Uncontrolled Potential To Emit (tons/yr)

| Emission Units | | PM | PM ₁₀ | PM _{2.5} | SO ₂ | NO _x | VOC | CO | Total HAPs | Highest Single HAP (Styrene) |
|--|--|---------------|------------------|-------------------|-----------------|-----------------|---------------|-------------|---------------|------------------------------|
| Four (4) Gel Coat Booths (GC1-GC4) | | 245.16 | 245.16 | 245.16 | 0.00 | 0.00 | 216.93 | 0.00 | 216.93 | 143.39 |
| Two (2) Production Gel Coat Booths (GC5-GC6) | | 82.75 | 82.75 | 82.75 | 0.00 | 0.00 | 99.04 | 0.00 | 99.04 | 99.04 |
| One (1) Tooling Gelcoat Booth (GC7) | | 0.61 | 0.61 | 0.61 | 0.00 | 0.00 | 0.97 | 0.00 | 0.97 | 0.88 |
| Three (3) Resin Chop Booths (C1-C3) | | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 199.04 | 0.00 | 199.04 | 199.04 |
| One (1) Production Lamination Booth (C4) | | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 109.78 | 0.00 | 109.78 | 109.78 |
| One (1) Tooling Resin Booth (C5) | | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 3.97 | 0.00 | 3.97 | 3.97 |
| Two (2) Portable Chop Guns (PC1 and PC2) | | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 10.52 | 0.00 | 10.52 | 10.52 |
| Resin Transfer Molding Operation (RTM1) | | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 10.19 | 0.00 | 9.18 | 8.27 |
| Mold Preparation and Cleanup Operation (RTMMP) | | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 5.37 | 0.00 | 0.00 | 0.00 |
| Four (4) Glue Application Booths | | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 15.34 | 0.00 | 2.79 | 0.00 |
| Four (4) Grinding Booths (G1-G4) | | 45.05 | 45.05 | 45.05 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| One (1) Production Grinding Room (G5) | | 11.26 | 11.26 | 11.26 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| One (1) Tooling Shop Grinding Room (G6) | | 11.26 | 11.26 | 11.26 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Insignificant Activities | Natural Gas Combustion | 0.16 | 0.63 | 0.63 | 0.05 | 8.25 | 0.45 | 6.93 | 0.16 | 0.00 |
| | One (1) Miscellaneous Woodworking Operation for Tooling Shop (MWT) | 0.07 | 0.07 | 0.07 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| | Welding | 0.02 | 0.01 | 0.01 | 0.00 | 0.00 | 0.00 | 0.00 | 0.01 | 0.00 |
| | Cutting Equipment | 0.03 | 0.03 | 0.03 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| | One (1) Resin Storage Tank (T1) | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.04 | 0.00 | 0.04 | 0.04 |
| | One (1) Resin Storage Tank (T2) | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.03 | 0.00 | 0.03 | 0.03 |
| | One (1) Resin Storage Tank (T3) | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.03 | 0.00 | 0.03 | 0.03 |
| | One (1) Resin Storage Tank (T4) | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.03 | 0.00 | 0.03 | 0.03 |
| | Spray Core Area (SC1) | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.02 | 0.00 | 0.02 | 0.02 |
| | Final Finish Repair | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.16 | 0.00 | 0.00 | - |
| | Mold Marking Paint | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.01 | 0.00 | 0.0046 | 0.00 |
| | Misc. Fillers/Sealants | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 2.73 | 0.00 | 2.73 | 2.73 |
| | Plastic Grinder (PLG1) | 4.38 | 4.38 | 4.38 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| | Vacuum Forming Plastics | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 2.74 | 0.00 | 0.00 | 0.00 |
| | Acetone Recycling Unit ¹ | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Final Finish Area (FFSS) | 11.04 | 11.04 | 11.04 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | |
| TOTAL | | 411.78 | 412.25 | 412.25 | 0.05 | 8.25 | 677.40 | 6.93 | 655.27 | 577.76 |
| Fugitive | Paved Roads (Fugitive) | 0.04 | 0.009 | 0.002 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Fugitive | Unpaved Roads (Fugitive) | 1.11 | 0.29 | 0.03 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |

¹ Acetone is exempt from the definition of a VOC per 40 CFR 51.100. Acetone is not considered a HAP.

**Appendix A: Emission Calculations
Emissions Summary**

Company Name: Patrick Industries, Inc. d/b/a Charleston Corporation
Source Address: 1849 and 1820 Dogwood Road, Bremen, Indiana 46506
MSM and SPM No. 099-38035-00037 and 099-38057-00037
Permit Reviewer: Brian Wright

Limited Potential To Emit (tons/yr)

| Emission Units | | PM | PM ₁₀ | PM _{2.5} | SO ₂ | NO _x | VOC | CO | Total HAPs | Highest Single HAP (Styrene) |
|--------------------------|--|--------------|------------------|-------------------|-----------------|-----------------|---------------|-------------|--------------|------------------------------|
| | Four (4) Gel Coat Booths (GC1-GC4) | 12.26 | 12.26 | 12.26 | 0.00 | 0.00 | 227.00 | 0.00 | 216.93 | 143.39 |
| | Two (2) Production Gel Coat Booths (GC5-GC6) | 4.14 | 4.14 | 4.14 | 0.00 | 0.00 | | 0.00 | 99.04 | 99.04 |
| | One (1) Tooling Gelcoat Booth (GC7) | 0.03 | 0.03 | 0.03 | 0.00 | 0.00 | | 0.00 | 0.97 | 0.88 |
| | Three (3) Resin Chop Booths (C1-C3) | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | | 0.00 | 199.04 | 199.04 |
| | One (1) Production Lamination Booth (C4) | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | | 0.00 | 109.78 | 109.78 |
| | One (1) Tooling Resin Booth (C5) | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | | 0.00 | 3.97 | 3.97 |
| | Two (2) Portable Chop Gun (PC1 and PC2) | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | | 0.00 | 10.52 | 10.52 |
| | Resin Transfer Molding Operation (RTM1) | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | | 0.00 | 9.18 | 8.27 |
| | Mold Preparation and Cleanup Operation (RTMMP) | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | | 0.00 | 0.00 | 0.00 |
| | Four (4) Glue Application Booths | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | | 15.34 | 0.00 | 2.79 |
| | Four (4) Grinding Booths (G1-G4) | 45.05 | 45.05 | 45.05 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| | One (1) Production Grinding Room (G5) | 11.26 | 11.26 | 11.26 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| | One (1) Tooling Shop Grinding Room (G6) | 11.26 | 11.26 | 11.26 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Insignificant Activities | Natural Gas Combustion | 0.16 | 0.63 | 0.63 | 0.05 | 8.25 | 0.45 | 6.93 | 0.16 | 0.00 |
| | One (1) Miscellaneous Woodworking Operation for Tooling Shop (MWT) | 0.07 | 0.07 | 0.07 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| | Welding | 0.02 | 0.02 | 0.02 | 0.00 | 0.00 | 0.00 | 0.00 | 0.01 | 0.00 |
| | Cutting Equipment | 0.03 | 0.03 | 0.03 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| | One (1) Resin Storage Tank (T1) | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.04 | 0.00 | 0.04 | 0.04 |
| | One (1) Resin Storage Tank (T2) | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.03 | 0.00 | 0.03 | 0.03 |
| | One (1) Resin Storage Tank (T3) | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.03 | 0.00 | 0.03 | 0.03 |
| | One (1) Resin Storage Tank (T4) | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.03 | 0.00 | 0.03 | 0.03 |
| | Spray Core Area (SC1) | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.02 | 0.00 | 0.02 | 0.02 |
| | Final Finish Repair | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.16 | 0.00 | 0.00 | - |
| | Mold Marking Paint | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.01 | 0.00 | 0.00 | 0.00 |
| | Misc. Fillers/Sealants | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 2.73 | 0.00 | 2.73 | 2.73 |
| | Plastic Grinder (PLG1) | 4.38 | 4.38 | 4.38 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| | Vacuum Forming Plastics | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 2.74 | 0.00 | 0.00 | 0.00 |
| | Acetone Recycling Unit ¹ | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Final Finish Area (FFSS) | 11.04 | 11.04 | 11.04 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | |
| TOTAL | | 99.69 | 100.16 | 100.16 | 0.05 | 8.25 | 248.58 | 6.93 | 655.3 | 577.8 |
| Fugitive | Paved Roads (Fugitive) | 0.04 | 0.01 | 0.002 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Fugitive | Unpaved Roads (Fugitive) | 1.11 | 0.29 | 0.03 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |

¹ Acetone is exempt from the definition of a VOC per 40 CFR 51.100. Acetone is not considered a HAP.

**Appendix A: Emission Calculations
VOC and Particulate
From Gel and Resin Coating Operations
Reinforced Plastics and Composites Fiberglass Processes**

Company Name: Patrick Industries, Inc. d/b/a Charleston Corporation
Source Address: 1849 and 1820 Dogwood Blvd, Bremen, Indiana 46506
MSM and SPM No. 099-38035-00037 and 099-38057-00037
Permit Reviewer: Brian Wright

| Production Gel Coat - GC1, GC2, GC3, & GC4 | | | | | | | | | | | | | | |
|--|------------------|---------------------------------|------------------|--------------------------------|--|--|-----------------------|------------------------|-------------------------|-----------------------------|-------------------------|-------------------------------|---------------------------------|-----------------------|
| Material | Density (Lb/Gal) | Weight % Styrene Monomer or VOC | Usage (gal/unit) | Maximum Production (unit/hour) | CFA Unified Emission Factor: Styrene (lb/ton)* | CFA Unified Emission Factor: MMA (lb/ton)* | Potential VOC (lb/hr) | Potential VOC (lb/day) | Potential VOC (tons/yr) | Potential Styrene (tons/yr) | Potential MMA (tons/yr) | Potential Total HAP (tons/yr) | Potential Particulate (tons/yr) | Transfer Efficiency** |
| White/Off-White Gelcoat | 11.50 | 30.00% | 1.739 | 16.00 | 309.70 | 1.05 | 49.53 | 1188.68 | 216.93 | 143.39 | 73.55 | 216.93 | 245.16 | 75% |
| Per Each Emission Unit | | | | | | | | | | | | | | |
| | | | | | | | 12.38 | 297.17 | 54.23 | 35.89 | 18.39 | 54.23 | 61.29 | |
| Particulate Control Efficiency | | | | | | | | | | | | | 85% | |
| Combined Controlled Particulate Potential (tons/yr) | | | | | | | | | | | | | 12.26 | |

*Highest Allowable Emission Rate (AER) of either 40 CFR 63, Subpart WWWW or Subpart VVVV - Subpart WWWW, Production Gelcoat - 23% Styrene & 7% MMA

**Mechanical Atomized Application: Air-Assisted Airless

| Production Resin - C1, C2, & C3 | | | | | | | | | | | | | | |
|---------------------------------|------------------|---------------------------------|------------------|--------------------------------|--|--|-----------------------|------------------------|-------------------------|-----------------------------|-------------------------|-------------------------------|---------------------------------|-----------------------|
| Material | Density (Lb/Gal) | Weight % Styrene Monomer or VOC | Usage (gal/unit) | Maximum Production (unit/hour) | CFA Unified Emission Factor: Styrene (lb/ton)* | CFA Unified Emission Factor: MMA (lb/ton)* | Potential VOC (lb/hr) | Potential VOC (lb/day) | Potential VOC (tons/yr) | Potential Styrene (tons/yr) | Potential MMA (tons/yr) | Potential Total HAP (tons/yr) | Potential Particulate (tons/yr) | Transfer Efficiency** |
| Open Molding Non-CR/HS Resin | 9.20 | 33.00% | 8.696 | 16.000 | 71.00 | 0 | 45.44 | 1090.60 | 199.04 | 199.04 | 0.00 | 199.04 | 0.00 | 100% |
| Per Each Emission Unit | | | | | | | | | | | | | | |
| | | | | | | | 15.15 | 363.53 | 66.35 | 66.35 | 0.00 | 66.35 | 0.00 | |

*Highest Allowable Emission Rate (AER) of either 40 CFR 63, Subpart WWWW or Subpart VVVV - Subpart WWWW, Non-CR/HS Resin - 33% Styrene

**Mechanical Non-Atomized Application: Fluid Impingement Technology (FIT)

| Production Gel Coat - GC5 & GC6 | | | | | | | | | | | | | | |
|--|------------------|---------------------------------|------------------|--------------------------------|--|--|-----------------------|------------------------|-------------------------|-----------------------------|-------------------------|-------------------------------|---------------------------------|-----------------------|
| Material | Density (Lb/Gal) | Weight % Styrene Monomer or VOC | Usage (gal/unit) | Maximum Production (unit/hour) | CFA Unified Emission Factor: Styrene (lb/ton)* | CFA Unified Emission Factor: MMA (lb/ton)* | Potential VOC (lb/hr) | Potential VOC (lb/day) | Potential VOC (tons/yr) | Potential Styrene (tons/yr) | Potential MMA (tons/yr) | Potential Total HAP (tons/yr) | Potential Particulate (tons/yr) | Transfer Efficiency** |
| Open Molding Other Production Gelcoat | 11.50 | 37.00% | 20.870 | 0.50 | 377.00 | 0 | 22.61 | 542.67 | 99.04 | 99.04 | 0.00 | 99.04 | 82.75 | 75% |
| Per Each Emission Unit | | | | | | | | | | | | | | |
| | | | | | | | 11.31 | 271.34 | 49.52 | 49.52 | 0.00 | 49.52 | 41.38 | |
| Particulate Control Efficiency | | | | | | | | | | | | | 95% | |
| Combined Controlled Particulate Potential (tons/yr) | | | | | | | | | | | | | 4.14 | |

*Highest Allowable Emission Rate (AER) of either 40 CFR 63, Subpart WWWW or Subpart VVVV - Subpart WWWW, Other Pigmented Production Gelcoat

**Mechanical Atomized Application: Air-Assisted Airless

| Tooling Gelcoat - GC7 | | | | | | | | | | | | | | |
|---|------------------|---------------------------------|------------------|--------------------------------|--|--|-----------------------|------------------------|-------------------------|-----------------------------|-------------------------|-------------------------------|---------------------------------|-----------------------|
| Material | Density (Lb/Gal) | Weight % Styrene Monomer or VOC | Usage (gal/unit) | Maximum Production (unit/hour) | CFA Unified Emission Factor: Styrene (lb/ton)* | CFA Unified Emission Factor: MMA (lb/ton)* | Potential VOC (lb/hr) | Potential VOC (lb/day) | Potential VOC (tons/yr) | Potential Styrene (tons/yr) | Potential MMA (tons/yr) | Potential Total HAP (tons/yr) | Potential Particulate (tons/yr) | Transfer Efficiency** |
| Open Molding Tooling Gelcoat | 9.50 | 42.00% | 16.822 | 0.006 | 463.00 | 45 | 0.22 | 5.33 | 0.97 | 0.88 | 0.02 | 0.97 | 0.61 | 75% |
| Controlled Particulate Potential (tons/yr) | | | | | | | | | | | | | | |
| | | | | | | | | | | | | | 0.03 | |

*Actual Estimated Emission Rate, Tooling Gelcoat - Emission Rate for MMA = 45 lb/ton with balance of allowable limit attributed to styrene; Compliance with Subpart WWWW Achieved by 63.5810(c) and Using the MACT Point Model for Subpart VVVV

**Mechanical Atomized Application: Air-Assisted Airless

| Production Resin - C4 | | | | | | | | | | | | | | |
|--|------------------|---------------------------------|------------------|--------------------------------|--|--|-----------------------|------------------------|-------------------------|-----------------------------|-------------------------|-------------------------------|---------------------------------|-----------------------|
| Material | Density (Lb/Gal) | Weight % Styrene Monomer or VOC | Usage (gal/unit) | Maximum Production (unit/hour) | CFA Unified Emission Factor: Styrene (lb/ton)* | CFA Unified Emission Factor: MMA (lb/ton)* | Potential VOC (lb/hr) | Potential VOC (lb/day) | Potential VOC (tons/yr) | Potential Styrene (tons/yr) | Potential MMA (tons/yr) | Potential Total HAP (tons/yr) | Potential Particulate (tons/yr) | Transfer Efficiency** |
| Open Molding non-CR/HS Resin | 9.39 | 38.40% | 121.333 | 0.50 | 88.00 | 0 | 25.06 | 601.56 | 109.78 | 109.78 | 0.00 | 109.78 | 0.00 | 100% |
| Highest Allowable Emission Rate (AER) of either 40 CFR 63, Subpart WWWW or Subpart VVVV - Subpart WWWW, Non-CR/HS Resin | | | | | | | | | | | | | | |
| Mechanical Non-Atomized Application: Fluid Impingement Technology (FIT) | | | | | | | | | | | | | | |

*Highest Allowable Emission Rate (AER) of either 40 CFR 63, Subpart WWWW or Subpart VVVV - Subpart WWWW, Tooling Resin

**Mechanical Non-Atomized Application: Fluid Impingement Technology (FIT)

| Production Resin - C5 | | | | | | | | | | | | | | |
|--|------------------|---------------------------------|------------------|--------------------------------|--|--|-----------------------|------------------------|-------------------------|-----------------------------|-------------------------|-------------------------------|---------------------------------|-----------------------|
| Material | Density (Lb/Gal) | Weight % Styrene Monomer or VOC | Usage (gal/unit) | Maximum Production (unit/hour) | CFA Unified Emission Factor: Styrene (lb/ton)* | CFA Unified Emission Factor: MMA (lb/ton)* | Potential VOC (lb/hr) | Potential VOC (lb/day) | Potential VOC (tons/yr) | Potential Styrene (tons/yr) | Potential MMA (tons/yr) | Potential Total HAP (tons/yr) | Potential Particulate (tons/yr) | Transfer Efficiency** |
| Open Molding Tooling Resin | 9.00 | 31.40% | 132.051 | 0.008 | 254.00 | 0 | 0.91 | 21.73 | 3.97 | 3.97 | 0.00 | 3.97 | 0.00 | 100% |
| Highest Allowable Emission Rate (AER) of either 40 CFR 63, Subpart WWWW or Subpart VVVV - Subpart WWWW, Tooling Resin | | | | | | | | | | | | | | |
| Mechanical Non-Atomized Application: Fluid Impingement Technology (FIT) | | | | | | | | | | | | | | |

*Highest Allowable Emission Rate (AER) of either 40 CFR 63, Subpart WWWW or Subpart VVVV - Subpart WWWW, Non-CR/HS Resin

**Mechanical Non-Atomized Application: Fluid Impingement Technology (FIT)

| Production Resin - Portable Units PC1 and PC2 | | | | | | | | | | | | | | |
|--|------------------|---------------------------------|------------------|--------------------------------|--|--|-----------------------|------------------------|-------------------------|-----------------------------|-------------------------|-------------------------------|---------------------------------|-----------------------|
| Material | Density (Lb/Gal) | Weight % Styrene Monomer or VOC | Usage (gal/unit) | Maximum Production (unit/hour) | CFA Unified Emission Factor: Styrene (lb/ton)* | CFA Unified Emission Factor: MMA (lb/ton)* | Potential VOC (lb/hr) | Potential VOC (lb/day) | Potential VOC (tons/yr) | Potential Styrene (tons/yr) | Potential MMA (tons/yr) | Potential Total HAP (tons/yr) | Potential Particulate (tons/yr) | Transfer Efficiency** |
| Open Molding non-CR/HS Resin | 9.00 | 38.40% | 12.133 | 0.50 | 88.00 | 0 | 2.40 | 57.66 | 10.52 | 10.52 | 0.00 | 10.52 | 0.00 | 100% |
| Highest Allowable Emission Rate (AER) of either 40 CFR 63, Subpart WWWW or Subpart VVVV - Subpart WWWW, Non-CR/HS Resin | | | | | | | | | | | | | | |
| Mechanical Non-Atomized Application: Fluid Impingement Technology (FIT) | | | | | | | | | | | | | | |

*Highest Allowable Emission Rate (AER) of either 40 CFR 63, Subpart WWWW or Subpart VVVV - Subpart WWWW, Non-CR/HS Resin

**Mechanical Non-Atomized Application: Fluid Impingement Technology (FIT)

| FIT Spray Core Applicator (SC1) | | | | | | | | | | | | | | |
|--|------------------|---------------------------------|------------------|--------------------------------|--|--|-----------------------|------------------------|-------------------------|-----------------------------|-------------------------|-------------------------------|---------------------------------|-----------------------|
| Material | Density (Lb/Gal) | Weight % Styrene Monomer or VOC | Usage (gal/unit) | Maximum Production (unit/hour) | CFA Unified Emission Factor: Styrene (lb/ton)* | CFA Unified Emission Factor: MMA (lb/ton)* | Potential VOC (lb/hr) | Potential VOC (lb/day) | Potential VOC (tons/yr) | Potential Styrene (tons/yr) | Potential MMA (tons/yr) | Potential Total HAP (tons/yr) | Potential Particulate (tons/yr) | Transfer Efficiency** |
| Open Molding non-CR/HS Resin | 5.20 | 33.00% | 5.000 | 0.006 | 71.00 | 0 | 0.01 | 0.13 | 0.02 | 0.02 | 0.00 | 0.02 | 0.00 | 100% |
| Highest Allowable Emission Rate (AER) of either 40 CFR 63, Subpart WWWW or Subpart VVVV - Subpart WWWW, Non-CR/HS Resin - 33% Styrene | | | | | | | | | | | | | | |
| Mechanical Non-Atomized Application: Fluid Impingement Technology (FIT) | | | | | | | | | | | | | | |

Catalyst - All RPC Units

Methyl Ethyl Ketone Peroxide

Note 1: Source provided data that MEKP in the Catalyst does not decompose after being sprayed together with resin or gelcoat. MEKP is immediately consumed by the resin to initiate the curing process, so no VOC is released. In addition,

Note 2: Catalyst is applied using Mechanical Non-Atomized Application - Fluid Impingement Technology (FIT). The Transfer Efficiency is 100%.

Note 3: There are negligible VOC or particulate emissions from the catalyst.

NOTES

Exclude catalyst emissions in HAP calculations

Acetone used as cleaning solvent

METHODOLOGY

Potential VOC (lb/hr) = [Density (lb/gal) * Usage (gal/unit) * Maximum Production (unit/hr) + 2,000 lb/ton] * Emission Factor: Styrene (lb/ton)

Potential VOC (lb/day) = Potential VOC (lb/hr) * 24 hr/day

Potential VOC (tons/yr) = Potential VOC (lb/hr) * 8,760 hr/yr + 2,000 lb/ton

Potential Particulate (tons/yr) = Maximum Production (unit/hour) * Usage (gal/unit) * Density (lb/gal) * (1 - Weight % VOC) * (1 - Transfer Efficiency) * 8760 hr/yr + 2000 lb/ton

Potential MMA (tons/yr) = [Density (lb/gal) * Usage (gal/unit) * Maximum Production (unit/hr) + 2,000 lb/ton] * Emission Factor: MMA (lb/ton) * 8760 hr/yr + 2000 lb/ton

**Appendix A: Emission Calculations
One (1) Resin Transfer Molding Operation (RTM1)**

Company Name: Patrick Industries, Inc. d/b/a Charleston Corporation
Source Address: 1849 and 1820 Dogwood Road, Bremen, Indiana 46506
MSM and SPM No. 099-38035-00037 and 099-38057-00037
Permit Reviewer: Brian Wright

VOC and PM/PM10

| Unit | Material ^{1,6} | Density (lbs/gal) | Weight % VOC | Max. Production Rate (unit/hr) | Max coating Usage (gal/unit) | Max Usage (lbs/hr) | VOC Emission Factor ² | PTE of VOC (lbs/hour) | PTE of VOC (ton/yr) | PTE of PM/PM10 before Controls (tons/yr) ³ | Transfer Efficiency ⁴ | PM/PM10 Control Efficiency ⁵ | PTE of PM/PM10 after Controls (ton/yr) |
|--------------|-------------------------|-------------------|--------------|--------------------------------|------------------------------|--------------------|----------------------------------|-----------------------|---------------------|---|----------------------------------|---|--|
| RTM1 | Production Resin | 8.99 | 61.50% | 4.00 | 3.50 | 125.86 | 3% | 2.32 | 10.17 | 0.00 | 100% | 0% | 0.00 |
| RTM1 | MEKP | 8.34 | 2.00% | 4.00 | 0.006 | 0.20 | 100% | 0.00 | 0.02 | 0.00 | 100% | 0% | 0.00 |
| Total | | | | | | | | 2.33 | 10.19 | 0.00 | | | 0.00 |

- 1 This unit applies production resin.
 - 2 The emission factor is for resin emitted from starting monomer for Closed Molding Operations. (AP-42 ch. 4.4-2)
VOC emissions from the MEKP catalyst are negligible, since the catalyst is consumed during the polymerization reaction.
 - 3 Assume all the PM emissions equal PM10 emissions.
 - 4 The transfer efficiency is based upon resin transfer injection molding.
 - 5 The OM control efficiency includes 100% capture efficiency with no controls.
 - 6 Acetone used as cleanup solvent and is is not considered a VOC or HAP.
- Application method is Resin Transfer Molding

METHODOLOGY

Max. usage (lbs/hr) = Max. Production Rate (unit/hr) * Max. Coating Usage (gal/unit) * Density (lbs/gal)
PTE of VOC (lbs/hr) = Max. Usage (lbs/hr) * Weight % VOC * emission Factor (%)
PTE of VOC (tons/yr) = Max. Usage (lbs/hr) * Weight % VOC * emission Factor (%) * 8760 hr/yr * 1 ton/ 2000 lbs
PTE of PM/PM10 before Controls (tons/yr) = Max Usage (lbs/hr) * (1-Weight % VOC) * (1-Transfer Efficiency) * 8760 hrs/yr * (1 ton/2000 lbs)
PTE of PM/PM10 after Controls (tons/yr) = Max Usage (lbs/hr) * (1-Weight % VOC) * (1-Control Efficiency)* 8760 hrs/yr * (1 ton/2000 lbs)

Hazardous Air Pollutants (HAPs)

| Unit | Material ¹ | Density (lbs/gal) | Max Production Rate (unit/hr) | Max. Coating Usage (gal/unit) | Maximum Usage (lbs/hr) | Emission Factor ² | Weight % Styrene | PTE Styrene (tons/yr) | Weight % MMA | PTE MMA (tons/yr) | Weight % DMA | PTE DMA (tons/yr) | Total HAPs (tons/yr) |
|------|-----------------------|-------------------|-------------------------------|-------------------------------|------------------------|------------------------------|------------------|-----------------------|--------------|-------------------|--------------|-------------------|----------------------|
| RTM1 | Production Resin | 8.99 | 4.00 | 3.50 | 125.86 | 3% | 50.00% | 8.27 | 5.00% | 0.83 | 0.50% | 0.08 | 9.18 |

- Application method is Resin Transfer Molding
- 1 This unit applies production resin.
 - 2 The emission factor is for resin emitted from starting monomer for Closed Molding Operations. (AP-42 ch. 4.4-2)

METHODOLOGY

Max. usage (lbs/hr) = Max. Production Rate (unit/hr) *Max. Coating Usage (gal/unit) * Density (lbs/gal)
PTE of VOC (tons/yr) = Max. Usage (lbs/hr) * Weight % HAP * emission Factor (%) * 8760 hr/yr * 1 ton/ 2000 lbs

Appendix A: Emissions Calculations
From Surface Coating Operations - RTM Mold Preparation and Cleanup Operations (RTMMP)

Company Name: Patrick Industries, Inc. d/b/a Charleston Corporation
Source Address: 1849 and 1820 Dogwood Road, Bremen, Indiana 46506
MSM and SPM No. 099-38035-00037 and 099-38057-00037
Permit Reviewer: Brian Wright

RTM Mold Preparation and Cleanup Operations (RTMMP)

| 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 (lb/hr) | Potential VOC (lb/day) | Potential VOC (ton/yr) | Particulate Potential (ton/yr) | lb VOC/gal solids | Transfer Efficiency* |
|-------------------------|------------------|------------------------------------|----------------|-------------------|----------------|---------------------------------|------------------------|---------------------|---|----------------------------------|-----------------------|------------------------|------------------------|--------------------------------|-------------------|----------------------|
| XTEND 1050 Mold Release | 6.00 | 99.00% | 0.00% | 99.00% | 0.00% | 1.75% | 0.0250 | 4.00 | 5.94 | 5.94 | 0.59 | 14.26 | 2.60 | 0.00 | 339.43 | 100% |
| XTEND XTR Mold Sealer | 6.46 | 98.00% | 0.00% | 98.00% | 0.00% | 3.25% | 0.0250 | 4.00 | 6.33 | 6.33 | 0.63 | 15.19 | 2.77 | 0.00 | 194.79 | 100% |
| Totals | | | | | | | | | | | 1.23 | 29.45 | 5.37 | 0.00 | | |

METHODOLOGY

*Transfer Efficiency is 100% for Hand Applied Materials.

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 hr/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)

This portion of the process does not use hazardous air pollutants. Acetone is the solvent used however it is not considered a VOC or HAP.

**Appendix A: Emissions Calculations
VOC and Particulate**

From Surface Coating Operations - Glue Application Areas ABS-AO, RPC-AO1, RPC-AO2, 4V-AO

Company Name: Patrick Industries, Inc. d/b/a Charleston Corporation
Source Address: 1849 and 1820 Dogwood Road, Bremen, Indiana 46506
MSM and SPM No. 099-38035-00037 and 099-38057-00037
Permit Reviewer: Brian Wright

| Material | Density (lb/gal) | Weight % Volatile (H ₂ O & Organics) | Weight % Water | Weight % Organics | Volume % Water | Volume % Non-Volatiles (Solids) | Material Usage (gal/unit) | Maximum Production (units/hr) | 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 | Potential Particulate (tons/yr) | lb VOC/gal solids | Transfer Efficiency* |
|-----------------------------------|------------------|---|----------------|-------------------|----------------|---------------------------------|---------------------------|-------------------------------|---|----------------------------------|-------------------------------|------------------------------|-----------------------------|---------------------------------|-------------------|----------------------|
| Siliprene Adhesive M6562 | 7.36 | 53.40% | 0.00% | 53.40% | 0.00% | 40.54% | 0.0557 | 16.00 | 3.93 | 3.93 | 3.50 | 84.06 | 15.34 | 0.00 | 9.69 | 100% |
| Acetone | 6.61 | 100.00% | 100.00% | 0.00% | 100.00% | 0.00% | 0.0250 | 16.00 | NA | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | NA | 100% |
| Combined PTE (4 stations) | | | | | | | | | | | 3.50 | 84.06 | 15.34 | 0.00 | | |
| Individual PTE (1 station) | | | | | | | | | | | 0.88 | 21.02 | 3.84 | 0.00 | | |

HAZARDOUS AIR POLLUTANTS

| Material | Density (lb/gal) | Material Usage (gal/unit) | Maximum Production (units/hr) | Weight % MIBK | MIBK Emissions (tons/yr) | Total HAP Emissions (tons/yr) |
|----------------------------------|------------------|---------------------------|-------------------------------|---------------|--------------------------|-------------------------------|
| Siliprene Adhesive M6562 | 7.36 | 0.0557 | 16.00 | 9.70% | 2.79 | 2.79 |
| Acetone | 6.61 | 0.0250 | 16.00 | 0.00% | 0.00 | 0.00 |
| Combined PTE (4 stations) | | | | | 2.79 | 2.79 |

METHODOLOGY

*Transfer Efficiency = 100% for manual application with a caulk gun (i.e., non-atomized flow coating)
Pounds of VOC per Gallon of Coating less Water (lb/gal) = Density (lb/gal) * Weight % Organics ÷ (1 - Volume % Water)
Pounds of VOC per Gallon of Coating (lb/gal) = Density (lb/gal) * Weight % Organics
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Material Usage (gal/unit) * Maximum Production (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Hour (lb/hr) * 24 hr/day
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/hr) * 8760 hr/yr ÷ 2000 lb/ton
Potential Particulate (tons/yr) = Maximum Production (units/hr) * Material Usage (gal/unit) * Density (lb/gal) * (1 - Weight % Volatiles) * (1 - Transfer Efficiency) * 8760 hr/yr ÷ 2000 lb/ton
Pounds VOC per Gallon of Solids = Density (lb/gal) * Weight % Organics ÷ Volume % Solids
Individual PTE = Combined PTE ÷ 4 Booths
MIBK/Total HAP Emissions (tons/yr) = Density (lb/gal) * Material Usage (gal/unit) * Maximum Production (units/hr) * Weight % HAP * 8760 hrs/yr ÷ 2000 lb/ton

Appendix A: Emission Calculations
Fiberglass Grinding Booth with Handheld Grinders (Production - G1 through G4)

Company Name: Patrick Industries, Inc. d/b/a Charleston Corporation
Source Address: 1849 and 1820 Dogwood Road, Bremen, Indiana 46506
MSM and SPM No. 099-38035-00037 and 099-38057-00037
Permit Reviewer: Brian Wright

Process Throughput Weight: 1.0310 tons/hr = 2062 lb/hr
 Production Gelcoat 0.1599 GC1 through GC4
 Production Resin 0.6400 C1 through C3
 Fiberglass 0.1600 (Production Resin / (1 - Glass Content @ 20%)) - Production Resin
 Wood Reinforcements 0.0711 (Production Resin / (1 - Wood Content @ 25%)) - Production Resin
 Design Maximum Air Flow Rate: 20,000 acfm (Four (4) Booths @ 5,000 cfm each)
 Overall Control Efficiency Rating: 95%
 Design Outlet Grain Loading: 0.003 grains/acf

Controlled Potential to Emit

$$\begin{aligned} \text{Combined Controlled PTE (lb/hr)} &= 0.003 \text{ grains/acf} \times 20,000 \text{ acfm} \times 60 \text{ min/hr} \div 7000 \text{ grains/lb} \\ \text{Combined Controlled PTE (lb/hr)} &= 0.51 \text{ lb/hr} \end{aligned}$$

$$\begin{aligned} \text{Combined Controlled PTE (tons/yr)} &= 0.51 \text{ lb/hr} \times 8,760 \text{ hr/yr} \div 2000 \text{ lb/ton} \\ \text{Combined Controlled PTE (tons/yr)} &= 2.25 \text{ tons/yr} \end{aligned}$$

$$\begin{aligned} \text{Individual Controlled PTE (lb/hr)} &= \text{Combined Controlled PTE (lb/hr)} \div 4 \text{ Booths} \\ \text{Individual Controlled PTE (lb/hr)} &= 0.13 \text{ lb/hr (per booth)} \end{aligned}$$

$$\begin{aligned} \text{Individual Controlled PTE (tons/yr)} &= \text{Combined Controlled PTE (tons/yr)} \div 4 \text{ Booths} \\ \text{Individual Controlled PTE (tons/yr)} &= 0.56 \text{ tons/yr (per booth)} \end{aligned}$$

Uncontrolled Potential to Emit

$$\begin{aligned} \text{Combined Uncontrolled PTE (tons/yr)} &= \text{Combined Controlled PTE (tons/year)} \div (1 - \text{Control Efficiency}) \\ \text{Combined Uncontrolled PTE (tons/yr)} &= 2.25 / (1 - 0.95) = 45.05 \text{ tons/year} \end{aligned}$$

$$\begin{aligned} \text{Individual Uncontrolled PTE (tons/yr)} &= \text{Combined Uncontrolled PTE (tons/year)} \div 4 \text{ Booths} \\ \text{Individual Uncontrolled PTE (tons/yr)} &= 11.26 \text{ tons/year (per booth)} \end{aligned}$$

$$\begin{aligned} \text{Individual Uncontrolled PTE (lb/hr)} &= 11.26 \text{ tons/yr} \times 2,000 \text{ lb/ton} \div 8760 \text{ hr/yr} \\ \text{Individual Uncontrolled PTE (lb/hr)} &= 2.57 \text{ lb/hr (per booth)} \end{aligned}$$

$$\begin{aligned} \text{Individual Uncontrolled PTE (lb/day)} &= 2.57 \text{ lb/hr} \times 24 \text{ hr/day} \\ \text{Individual Uncontrolled PTE (lb/day)} &= 61.71 \text{ lb/day (per booth)} \end{aligned}$$

Allowable Emissions (326 IAC 6-3-2)

Pursuant to 326 IAC 6-3-2(e)(1): $E = 4.10 P^{0.67}$

$$\begin{aligned} \text{where: } P &= \text{Process weight rate (tons/hr)} = 1.0310 \text{ tons/hr} = 0.25775 \text{ tons/hr (per booth)} \\ E &= \text{Limited Potential to Emit (lb/hr)} \end{aligned}$$

$$E \text{ (per booth)} = 1.65 \text{ lb/hr (per booth)} \quad (\text{capable of complying WITH controls})$$

Appendix A: Emission Calculations
Fiberglass Grinding Booth with Handheld Grinders (Production - G5)

Company Name: Patrick Industries, Inc. d/b/a Charleston Corporation
Source Address: 1849 and 1820 Dogwood Road, Bremen, Indiana 46506
MSM and SPM No. 099-38035-00037 and 099-38057-00037
Permit Reviewer: Brian Wright

| | | | | |
|------------------------------------|--------|---|------|-------|
| Process Throughput Weight: | 0.554 | tons/hr = | 1108 | lb/hr |
| Production Gelcoat | 0.0600 | GC5 + GC6 | | |
| Production Resin | 0.3121 | C4 + PC1 | | |
| Fiberglass | 0.0780 | (Production Resin / (1 - Glass Content @ 20%)) - Production Resin | | |
| Wood Reinforcements | 0.1040 | (Production Resin / (1 - Wood Content @ 25%)) - Production Resin | | |
| Design Maximum Air Flow Rate: | 5,000 | acfm | | |
| Overall Control Efficiency Rating: | 95% | | | |
| Design Outlet Grain Loading: | 0.003 | grains/acf | | |

Controlled Potential to Emit

| | | | | | | | | |
|----------------------------|-------|--------------|-------|---------|------|----------|------|-----------|
| Controlled PTE (lb/hr) = | 0.003 | grains/acf X | 5,000 | acfm X | 60 | min/hr ÷ | 7000 | grains/lb |
| Controlled PTE (lb/hr) = | 0.13 | lb/hr | | | | | | |
| Controlled PTE (tons/yr) = | 0.13 | lb/hr X | 8,760 | hr/yr ÷ | 2000 | lb/ton | | |
| Controlled PTE (tons/yr) = | 0.56 | tons/yr | | | | | | |

Uncontrolled Potential to Emit

| | | | | | |
|------------------------------|---|---------|-----------|--------|-------|
| Uncontrolled PTE (tons/yr) = | Controlled PTE (tons/year) ÷ (1 - Control Efficiency) | | | | |
| Uncontrolled PTE (tons/yr) = | 0.56 / (1 - 0.95) = | 11.26 | tons/year | | |
| Uncontrolled PTE (lb/hr) = | 11.26 tons/yr X | 2,000 | lb/ton ÷ | 8760 | hr/yr |
| Uncontrolled PTE (lb/hr) = | 2.57 | lb/hr | | | |
| Uncontrolled PTE (lb/day) = | 2.57 | lb/hr X | 24 | hr/day | |
| Uncontrolled PTE (lb/day) = | 61.71 | lb/day | | | |

Allowable Emissions (326 IAC 6-3-2)

Pursuant to 326 IAC 6-3-2(e)(1): $E = 4.10 P^{0.67}$

where: P = Process weight rate (tons/hr) = 0.554 tons/hr
 E = Limited Potential to Emit (lb/hr)

E = 2.76 lb/hr (capable of complying WITHOUT controls)

Appendix A: Emission Calculations
Fiberglass Grinding Booth with Handheld Grinders (Tooling Shop - G6)

Company Name: Patrick Industries, Inc. d/b/a Charleston Corporation
Source Address: 1849 and 1820 Dogwood Road, Bremen, Indiana 46506
MSM and SPM No. 099-38035-00037 and 099-38057-00037
Permit Reviewer: Brian Wright

| | | | | |
|------------------------------------|--------|---|----|-------|
| Process Throughput Weight: | 0.01 | tons/hr = | 18 | lb/hr |
| Production Gelcoat | 0.0005 | GC5 + GC6 | | |
| Production Resin | 0.0036 | C4 + PC1 | | |
| Fiberglass | 0.0015 | (Production Resin / (1 - Glass Content @ 20%)) - Production Resin | | |
| Wood Reinforcements | 0.0036 | (Production Resin / (1 - Wood Content @ 25%)) - Production Resin | | |
| Design Maximum Air Flow Rate: | 5,000 | acfm | | |
| Overall Control Efficiency Rating: | 95% | | | |
| Design Outlet Grain Loading: | 0.003 | grains/acf | | |

Controlled Potential to Emit

| | | | | | | | | |
|----------------------------|-------|--------------|-------|---------|------|----------|------|-----------|
| Controlled PTE (lb/hr) = | 0.003 | grains/acf X | 5,000 | acfm X | 60 | min/hr ÷ | 7000 | grains/lb |
| Controlled PTE (lb/hr) = | 0.13 | lb/hr | | | | | | |
| Controlled PTE (tons/yr) = | 0.13 | lb/hr X | 8,760 | hr/yr ÷ | 2000 | lb/ton | | |
| Controlled PTE (tons/yr) = | 0.56 | tons/yr | | | | | | |

Uncontrolled Potential to Emit

| | | | | | | |
|------------------------------|---|--------|-----------|------|-------|--|
| Uncontrolled PTE (tons/yr) = | Controlled PTE (tons/year) ÷ (1 - Control Efficiency) | | | | | |
| Uncontrolled PTE (tons/yr) = | 0.56 / (1 - 0.95) = | 11.26 | tons/year | | | |
| Uncontrolled PTE (lb/hr) = | 11.26 tons/yr X | 2,000 | lb/ton ÷ | 8760 | hr/yr | |
| Uncontrolled PTE (lb/hr) = | 2.57 | lb/hr | | | | |
| Uncontrolled PTE (lb/day) = | 2.57 lb/hr X | 24 | hr/day | | | |
| Uncontrolled PTE (lb/day) = | 61.71 | lb/day | | | | |

Allowable Emissions (326 IAC 6-3-2)

Pursuant to 326 IAC 6-3-2(e)(2):

| | | | |
|-----|-------|-------|--------------------------------------|
| E = | 0.551 | lb/hr | (capable of complying WITH controls) |
|-----|-------|-------|--------------------------------------|

**Appendix A: Emission Calculations
ABS Plastic Regrinding Machine (PLG1)**

Company Name: Patrick Industries, Inc. d/b/a Charleston Corporation
Source Address: 1849 and 1820 Dogwood Road, Bremen, Indiana 46506
MSM and SPM No. 099-38035-00037 and 099-38057-00037
Permit Reviewer: Brian Wright

Process Throughput Weight: 0.188 tons/hr = 375 lb/hr
 Scrap ABS Plastic: 0.1875 GC1 through GC4
 Design Maximum Air Flow Rate: 1,750 acfm
 Overall Control Efficiency Rating: 98.5%
 Design Outlet Grain Loading: 0.001 grains/acf

Controlled Potential to Emit

Controlled PTE (lb/hr) = 0.001 grains/acf X 1,750 acfm X 60 min/hr ÷ 7000 grains/lb
 Controlled PTE (lb/hr) = 0.02 lb/hr
 Controlled PTE (tons/yr) = 0.02 lb/hr X 8,760 hr/yr ÷ 2000 lb/ton
 Controlled PTE (tons/yr) = 0.07 tons/yr

Uncontrolled Potential to Emit

Uncontrolled PTE (tons/yr) = Controlled PTE (tons/year) ÷ (1 - Control Efficiency)
 Uncontrolled PTE (tons/yr) = 0.07 / (1 - 0.985) = 4.38 tons/year
 Uncontrolled PTE (lb/hr) = Controlled PTE (lb/hr) ÷ (1 - Control Efficiency)
 Uncontrolled PTE (lb/hr) = 0.02 / (1 - 0.985) = 1.00 lb/hr

Allowable Emissions (326 IAC 6-3-2)

Pursuant to 326 IAC 6-3-2(e)(1): $E = 4.10 P^{0.67}$

where: P = Process weight rate (tons/hr) = 0.188 tons/hr
 E = Limited Potential to Emit (lb/hr)

E = 1.34 lb/hr (capable of complying WITHOUT controls)

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
MMBtu/hr <100
All Natural Gas-Fired Units**

Company Name: Patrick Industries, Inc. d/b/a Charleston Corporation
Source Address: 1849 and 1820 Dogwood Road, Bremen, Indiana 46506
MSM and SPM No. 099-38035-00037 and 099-38057-00037
Permit Reviewer: Brian Wright

| Unit | Number of Units | Maximum Heat Input Capacity (MMBtu/hr) | Total Heat Input Capacity (MMBtu/hr) |
|--|-----------------|--|--------------------------------------|
| Two (2) Aerovent MAU heaters | 2 | 2.5 | 5 |
| One (1) Aerovent MAU heater | 1 | 3 | 3 |
| One (1) Rheem heater | 1 | 5.28 | 5.28 |
| Two (2) Thermo Cyclers | 2 | 0.4 | 0.8 |
| Four (4) radiant heaters | 4 | 0.1 | 0.4 |
| One (1) Rheem furnace | 1 | 0.15 | 0.15 |
| One (1) Luxaire furnace | 1 | 0.1 | 0.1 |
| One (1) Amana furnace | 1 | 0.056 | 0.056 |
| Two (2) Beacon Morris furnaces | 2 | 0.075 | 0.15 |
| One (1) Modine furnace | 1 | 0.1 | 0.1 |
| Five (5) natural gas fired radiant heaters (MSRH1 through MSRH5) | 5 | 0.1 | 0.5 |
| One (1) natural gas fired air makeup unit (MSAM1) | 1 | 2.2 | 2.2 |
| Ten (10) radiant space heaters (RH1 through RH10) | 10 | 0.1 | 1 |
| One (1) forced air furnace (OH1) | 1 | 0.1 | 0.1 |
| Total | | 18.836 | |

| | |
|-------|----------------------|
| HHV | Potential Throughput |
| mmBtu | MMcft/yr |
| mmscf | |
| 1000 | 165.0 |

| Emission Factor (lb/MMcf) | Pollutant | | | | | | |
|-------------------------------|-----------|--------------------|---------------------|-----------------|-----------------|------|------|
| | PM* | PM ₁₀ * | PM _{2.5} * | SO ₂ | NO _x | VOC | CO |
| Potential Emissions (tons/yr) | 0.16 | 0.63 | 0.63 | 0.05 | 8.25 | 0.45 | 6.93 |

* PM emission factor is filterable PM only. PM₁₀ and PM_{2.5} emission factors are filterable and condensable PM combined.

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

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.

Hazardous Air Pollutants (HAPs)

| | HAPs - Organics | | | | |
|-------------------------------|-----------------|-----------------|--------------|---------|---------|
| | Benzene | Dichlorobenzene | Formaldehyde | Hexane | Toluene |
| 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 | 1.7E-04 | 9.9E-05 | 6.2E-03 | 1.5E-01 | 2.8E-04 |

| | HAPs - Metals | | | | |
|-------------------------------|---------------|---------|----------|-----------|---------|
| | Lead | Cadmium | Chromium | Manganese | Nickel |
| 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 | 4.1E-05 | 9.1E-05 | 1.2E-04 | 3.1E-05 | 1.7E-04 |

Methodology

Potential Throughput (MMcft/yr) = Heat Input Capacity (MMBtu/hr) * 8,760 hrs/yr ÷ 1,000 MMBtu/MMcf

Potential Emissions (tons/yr) = Throughput (MMcft/yr) * Emission Factor (lb/MMcf) ÷ 2,000 lb/ton

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
Natural Gas Combustion Only
MMBtu/hr <100
New Natural Gas-Fired Units**

Company Name: Patrick Industries, Inc. d/b/a Charleston Corporation
Source Address: 1849 and 1820 Dogwood Road, Bremen, Indiana 46506
MSM and SPM No. 099-38035-00037 and 099-38057-00037
Permit Reviewer: Brian Wright

| Unit | Number of Units | Maximum Heat Input Capacity (MMBtu/hr) | Total Heat Input Capacity (MMBtu/hr) | HHV mmBtu | Potential Throughput |
|---|-----------------|--|--------------------------------------|--------------|----------------------|
| Three (3) natural gas fired radiant heaters (MSRH3 through MSRH5) | 3 | 0.1 | 0.3 | mmscf | MMcf/yr |
| Total | | | 0.300 | 1000 | 2.6 |

| Emission Factor (lb/MMcf) | Pollutant | | | | | | |
|-------------------------------|-----------|--------------------|---------------------|-----------------|-----------------|------|------|
| | PM* | PM ₁₀ * | PM _{2.5} * | SO ₂ | NO _x | VOC | CO |
| | 1.9 | 7.6 | 7.6 | 0.6 | 100 | 5.5 | 84 |
| Potential Emissions (tons/yr) | 0.00 | 0.01 | 0.01 | 0.00 | **see below | 0.01 | 0.11 |

* PM emission factor is filterable PM only. PM₁₀ and PM_{2.5} emission factors are filterable and condensable PM combined.

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

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.

Hazardous Air Pollutants (HAPs)

| | HAPs - Organics | | | | |
|-------------------------------|-----------------|-----------------|--------------|---------|---------|
| | Benzene | Dichlorobenzene | Formaldehyde | Hexane | Toluene |
| 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 | 2.8E-06 | 1.6E-06 | 9.9E-05 | 2.4E-03 | 4.5E-06 |

| | HAPs - Metals | | | | |
|-------------------------------|---------------|---------|----------|-----------|---------|
| | Lead | Cadmium | Chromium | Manganese | Nickel |
| 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 | 6.6E-07 | 1.4E-06 | 1.8E-06 | 5.0E-07 | 2.8E-06 |

Methodology

Potential Throughput (MMcf/yr) = Heat Input Capacity (MMBtu/hr) * 8,760 hrs/yr ÷ 1,000 MMBtu/MMcf

Potential Emissions (tons/yr) = Throughput (MMcf/yr) * Emission Factor (lb/MMcf) ÷ 2,000 lb/ton

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
Miscellaneous Woodworking Operations for Tooling Shop (MWT)

Company Name: Patrick Industries, Inc. d/b/a Charleston Corporation
Source Address: 1849 and 1820 Dogwood Road, Bremen, Indiana 46506
MSM and SPM No. 099-38035-00037 and 099-38057-00037
Permit Reviewer: Brian Wright

Sanding

| Process/Operation | Description | ID | Surface Thickness Removed (in) | Surface Width Removed (in) | Surface Distance (in/hr) | Material Loss (in ³ /hr) | Material Density (lb/in ³) | Potential to Emit (lb/hr) |
|-------------------|-------------|------|--------------------------------|----------------------------|--------------------------|-------------------------------------|--|---------------------------|
| Sander | Belt Sander | BTS1 | 0.025 | 2.00 | 6.00 | 0.300 | 0.023 | 0.007 |

Cutting

| Process/Operation | Description | ID | Material Thickness (in) | Cutting Surface Thickness (in) | Process rate (in/hr) | Material Loss (in ³ /hr) | Material Density (lb/in ³) | Potential to Emit (lb/hr) |
|-------------------|------------------|-----|-------------------------|--------------------------------|----------------------|-------------------------------------|--|---------------------------|
| Cutting | Vertical Bandsaw | BS3 | 0.25 | 0.031 | 6.00 | 0.047 | 0.023 | 0.001 |

Routing

| Process/Operation | Description | ID | Material Thickness (in) | Bit Area (in ²) | Process Rate (in/hr) | Material Loss (in ³ /hr) | Material Density (lb/in ³) | Potential to Emit (lb/hr) |
|-------------------|-------------|------|-------------------------|-----------------------------|----------------------|-------------------------------------|--|---------------------------|
| Routing | CNC Machine | CNC1 | 0.25 | 0.20 | 6.00 | 0.300 | 0.023 | 0.007 |

Total Potential to Emit

| | |
|--|--------------|
| Total Particulate Emissions (lb/hr) | 0.015 |
| Total Particulate Emissions (lb/day) | 0.357 |
| Total Particulate Emissions (tons/yr) | 0.065 |

Allowable Emissions (326 IAC 6-3-2)

This operation can generate potential particulate emissions of 0.015 lb/hr.
Pursuant to 326 IAC 6-3-1(b)(14), this operation is exempt from 326 IAC 6-3 because it has potential emissions less than 0.551 lb/hr.

NOTES:

Material Density (lb/in³) = 40 lb/ft³ or 0.023 lb/in³ for Southern Pine

METHODOLOGY:

Material Loss for Sander/Cutting (in³/hr) = Surface Thickness (in) * Surface Width (in) * Surface Distance (in/hr)

Material Loss for Routing (in³/hr) = Material Thickness (in) * Bit Area (in²) * Process Rate (in/hr)

Potential to Emit (lb/hr) = Material Loss (in³/hr) * Material Density (lb/in³)

Potential to Emit (lb/day) = Potential to Emit (lb/hr) * 24 hr/day

Potential to Emit (tons/yr) = Potential to Emit (lb/hr) * 8,760 hr/yr ÷ 2,000 lbs/ton

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

Company Name: Patrick Industries, Inc. d/b/a Charleston Corporation
Source Address: 1849 and 1820 Dogwood Road, Bremen, Indiana 46506
MSM and SPM No. 099-38035-00037 and 099-38057-00037
Permit Reviewer: Brian Wright

| PROCESS | Number of Stations | Max. electrode consumption per station (lbs/hr) | Max. electrode consumption per station (lbs/day) | EMISSION FACTORS* (lb pollutant/lb electrode) | | | | EMISSIONS (lbs/hr) | | | | HAPS (lbs/hr) | GHGs (as CO ₂ e) (tons/yr) |
|--|--------------------|---|--|---|---------|---------|---------|-----------------------|-------|---------|-----------|------------------|---|
| | | | | PM = PM ₁₀ | Mn | Ni | Cr | PM = PM ₁₀ | Mn | Ni | Cr | | |
| WELDING | | | | | | | | | | | | | |
| Submerged Arc | | | | 0.036 | 0.011 | | | 0.000 | 0.000 | 0.000 | 0 | 0.000 | |
| Metal Inert Gas (MIG)(E70S) | 3 | 0.25 | 6.0 | 0.0052 | 0.00318 | 0.00001 | 0.00001 | 0.004 | 0.002 | 0.00001 | 0.0000075 | 0.002 | 10,000 |
| Stick (E7018 electrode) | | | | 0.0211 | 0.0009 | | | 0.000 | 0.000 | 0.000 | 0 | 0.000 | |
| Tungsten Inert Gas (TIG)(carbon steel) | | | | 0.0055 | 0.0005 | | | 0.000 | 0.000 | 0.000 | 0 | 0.000 | |
| Oxyacetylene(carbon steel) | | | | 0.0055 | 0.0005 | | | 0.000 | 0.000 | 0.000 | 0 | 0.000 | |
| 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) | GHGs (as CO ₂ e) (tons/yr) |
| | | | | PM = PM ₁₀ | Mn | Ni | Cr | PM = PM ₁₀ | Mn | Ni | Cr | | |
| | | | | | | | | | | | | | |
| Oxyacetylene | | | | 0.1622 | 0.0005 | 0.0001 | 0.0003 | 0.000 | 0.000 | 0.000 | 0.000 | 0.000 | |
| Oxymethane | | | | 0.0815 | 0.0002 | | 0.0002 | 0.000 | 0.000 | 0.000 | 0.000 | 0.000 | |
| Plasma** | | | | 0.0039 | | | | 0.000 | 0.000 | 0.000 | 0.000 | 0.000 | |
| EMISSION TOTALS | | | | | | | | | | | | | |
| Potential Emissions lbs/hr | | | | | | | | 0.004 | 0.002 | 0.000 | 0.000 | 0.002 | --- |
| Potential Emissions lbs/day | | | | | | | | 0.09 | 0.06 | 0.00 | 0.00 | 0.06 | --- |
| Potential Emissions tons/year | | | | | | | | 0.02 | 0.01 | 0.00 | 0.00 | 0.01 | 10,000 |

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

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

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

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)

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)

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.

The total GHG emissions (as CO₂e) from welding have been conservatively estimated to not exceed 10,000 tons per year.

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

Company Name: Patrick Industries, Inc. d/b/a Charleston Corporation
Source Address: 1849 and 1820 Dogwood Road, Bremen, Indiana 46506
MSM and SPM No. 099-38035-00037 and 099-38057-00037
Permit Reviewer: Brian Wright

| PROCESS | Number of Stations | Max. electrode consumption per station (lbs/hr) | Max. electrode consumption per station (lbs/day) | EMISSION FACTORS* (lb pollutant/lb electrode) | | | | EMISSIONS (lbs/hr) | | | | HAPS (lbs/hr) | GHGs (as CO ₂ e) (tons/yr) | |
|-------------------------------|--------------------|---|--|--|---------|---------|---------|-----------------------|-------|---------|-----------|------------------|---|--|
| | | | | PM = PM ₁₀ | Mn | Ni | Cr | PM = PM ₁₀ | Mn | Ni | Cr | | | |
| WELDING | | | | | | | | | | | | | | |
| Metal Inert Gas (MIG)(E70S) | 1 | 0.25 | 6.0 | 0.0052 | 0.00318 | 0.00001 | 0.00001 | 0.001 | 0.001 | 0.00000 | 0.0000025 | 0.001 | 10,000 | |
| EMISSION TOTALS | | | | | | | | | | | | | | |
| Potential Emissions lbs/hr | | | | | | | | 0.001 | 0.001 | 0.000 | 0.000 | 0.001 | --- | |
| Potential Emissions lbs/day | | | | | | | | 0.03 | 0.02 | 0.00 | 0.00 | 0.02 | --- | |
| Potential Emissions tons/year | | | | | | | | 0.01 | 0.00 | 0.00 | 0.00 | 0.00 | 10,000 | |

METHODOLOGY:

*Emission Factors are default values for carbon steel unless a specific electrode type is noted in the Process column.
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.
The total GHG emissions (as CO₂e) from welding have been conservatively estimated to not exceed 10,000 tons per year.

**Appendix A: Emissions Calculations
Cutting Equipment - Mold Making Operations**

Company Name: Patrick Industries, Inc. d/b/a Charleston Corporation
Source Address: 1849 and 1820 Dogwood Road, Bremen, Indiana 46506
MSM and SPM No. 099-38035-00037 and 099-38057-00037
Permit Reviewer: Brian Wright

Cutting

| Process / Operation | Description | ID | Material Thickness (in) | Cutting Surface Thickness (in) | Process rate (in/hr) | Material Loss (in ³ /hr) | Material Density (lb/in ³) | Potential to Emit (lb/hr) |
|---------------------|----------------|------|-------------------------|--------------------------------|----------------------|-------------------------------------|--|---------------------------|
| Cutting | Table Saw | TS1 | 0.25 | 0.031 | 6.00 | 0.047 | 0.023 | 0.001 |
| Cutting | Table Saw | TS2 | 0.25 | 0.031 | 6.00 | 0.047 | 0.023 | 0.001 |
| Cutting | Radial Arm Saw | RAS1 | 0.25 | 0.031 | 6.00 | 0.047 | 0.023 | 0.001 |
| Cutting | Radial Arm Saw | RAS2 | 0.25 | 0.031 | 6.00 | 0.047 | 0.023 | 0.001 |
| Cutting | Bandsaw | BS1 | 0.25 | 0.031 | 6.00 | 0.047 | 0.023 | 0.001 |
| Cutting | Bandsaw | BS2 | 0.25 | 0.031 | 6.00 | 0.047 | 0.023 | 0.001 |

Total Potential to Emit

| | |
|--|--------------|
| Total Particulate Emissions (lb/hr) | 0.006 |
| Total Particulate Emissions (lb/day) | 0.154 |
| Total Particulate Emissions (tons/yr) | 0.028 |

Allowable Emissions (326 IAC 6-3-2)

This operation can generate potential particulate emissions of 0.006 lb/hr.

Pursuant to 326 IAC 6-3-1(b)(14), this operation is exempt from 326 IAC 6-3 because it has potential emissions less than 0.551 lb/hr.

NOTES:

Material Density (lb/in³) = 40 lb/ft³ or 0.023 lb/in³ for Southern Pine

METHODOLOGY:

Material Loss for Sander/Cutting (in³/hr) = Surface Thickness (in) * Surface Width (in) * Surface Distance (in/hr)

Material Loss for Routing (in³/hr) = Material Thickness (in) * Bit Area (in²) * Process Rate (in/hr)

Potential to Emit (lb/hr) = Material Loss (in³/hr) * Material Density (lb/in³)

Potential to Emit (lb/day) = Potential to Emit (lb/hr) * 24 hr/day

Potential to Emit (tons/yr) = Potential to Emit (lb/hr) * 8,760 hr/yr ÷ 2,000 lbs/ton

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

**Final finish repair of fiberglass
Mold marking paint
Miscellaneous fillers and sealants usage**

Company Name: Patrick Industries, Inc. d/b/a Charleston Corporation
Source Address: 1849 and 1820 Dogwood Road, Bremen, Indiana 46506
MSM and SPM No. 099-38035-00037 and 099-38057-00037
Permit Reviewer: Brian Wright

| 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 | Particulate Potential (ton/yr) | lb VOC/gal solids | Transfer Efficiency |
|--|------------------|------------------------------------|----------------|-------------------|----------------|---------------------------------|------------------------|---------------------|---|----------------------------------|-------------------------------|------------------------------|-----------------------------|--------------------------------|-------------------|---------------------|
| Final Finish Repair - 3M Ultra Fine Machine Polish | 8.92 | 74.20% | 74.10% | 0.10% | 79.29% | 20.61% | 0.250 | 16.000 | 0.04 | 0.01 | 0.04 | 0.86 | 0.16 | 0.00 | 0.04 | 100% |
| Mold Marking Paint - Flat Black Paint | 6.51 | 71.20% | 30.60% | 40.60% | 30.11% | 37.07% | 0.125 | 0.006 | 3.78 | 2.64 | 0.00 | 0.05 | 0.01 | 0.003 | 7.13 | 50% |
| Misc. Fillers/Sealants - White Marine Filler | 15.56 | 15.00% | 0.00% | 15.00% | 0.00% | 69.05% | 0.017 | 16.000 | 2.33 | 2.33 | 0.62 | 14.97 | 2.73 | 0.00 | 3.38 | 100% |
| Total Potential to Emit | | | | | | | | | | | 0.66 | 15.87 | 2.90 | 0.003 | | |

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 hr/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)
Total = Worst Coating + Sum of all solvents used

| Material | Density (Lb/Gal) | Gallons of Material (gal/unit) | Maximum (unit/hour) | Weight % Toluene | Weight % Styrene | Toluene Emissions (ton/yr) | Styrene Emissions (ton/yr) | Total HAP Emissions (ton/yr) |
|--|------------------|--------------------------------|---------------------|------------------|------------------|----------------------------|----------------------------|------------------------------|
| Final Finish Repair - 3M Ultra Fine Machine Polish | 8.92 | 0.2500 | 16.00 | 0.00% | 0.0% | 0.0 | 0.0 | 0.0 |
| Mold Marking Paint - Flat Black Paint | 6.51 | 0.1250 | 0.01 | 12.80% | 0.0% | 0.0046 | 0.0 | 0.0046 |
| Misc. Fillers/Sealants - White Marine Filler | 15.56 | 0.0167 | 16.00 | 0.00% | 15.00% | 0.00 | 2.73 | 2.73 |
| Total Potential to Emit | | | | | | 0.0046 | 2.73 | 2.74 |

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
Emissions Losses From One (1) Resin Tank (T1)

Company Name: Patrick Industries, Inc. d/b/a Charleston Corporation
Source Address: 1849 and 1820 Dogwood Road, Bremen, Indiana 46506
MSM and SPM No. 099-38035-00037 and 099-38057-00037
Permit Reviewer: Brian Wright

Emissions Losses From One (1) Resin Tank (T1)

Total Emissions Losses as Styrene (100-42-5)

| PTE of Styrene (lbs/year) | PTE of Styrene (lbs/hour) | PTE of Styrene (lbs/day) | PTE of Styrene (tons/year) |
|---------------------------|---------------------------|--------------------------|----------------------------|
| 82.44 | 0.0094 | 0.2259 | 0.04 |

Emissions Losses From One (1) Resin Tank (T2)

Total Emissions Losses as Styrene (100-42-5)

| PTE of Styrene (lbs/year) | PTE of Styrene (lbs/hour) | PTE of Styrene (lbs/day) | PTE of Styrene (tons/year) |
|---------------------------|---------------------------|--------------------------|----------------------------|
| 64.60 | 0.0074 | 0.1770 | 0.03 |

Emissions Losses From One (1) Resin Tank (T3)

Total Emissions Losses as Styrene (100-42-5)

| PTE of Styrene (lbs/year) | PTE of Styrene (lbs/hour) | PTE of Styrene (lbs/day) | PTE of Styrene (tons/year) |
|---------------------------|---------------------------|--------------------------|----------------------------|
| 52.40 | 0.0060 | 0.1436 | 0.03 |

Emissions Losses From One (1) Resin Tank (T4)

Total Emissions Losses as Styrene (100-42-5)

| PTE of Styrene (lbs/year) | PTE of Styrene (lbs/hour) | PTE of Styrene (lbs/day) | PTE of Styrene (tons/year) |
|---------------------------|---------------------------|--------------------------|----------------------------|
| 52.40 | 0.0060 | 0.1451 | 0.03 |

Methodology
TANKS 4.0.9d

Appendix A: Emission Calculations
Fiberglass Final Finish Scuff Sanding and Cutting Area (FFSS)

Company Name: Patrick Industries, Inc. d/b/a Charleston Corporation
Source Address: 1849 and 1820 Dogwood Road, Bremen, Indiana 46506
MSM and SPM No. 099-38035-00037 and 099-38057-00037
Permit Reviewer: Brian Wright

Process Throughput Weight: 1.0260 tons/hr = 2052 lb/hr
 Design Maximum Air Flow Rate: 2,450 acfm Eurovac Dust Collector DC1
 Overall Control Efficiency Rating: 99%
 Design Outlet Grain Loading: 0.0012 grains/acf (Estimated Dust Generation = 0.25 lb/hr/tool)

Controlled Potential to Emit

Controlled PTE (lb/hr) = 0.0012 grains/acf X 2,450 acfm X 60 min/hr ÷ 7000 grains/lb
 Controlled PTE (lb/hr) = 0.03 lb/hr
 Controlled PTE (tons/yr) = 0.03 lb/hr X 8,760 hr/yr ÷ 2000 lb/ton
 Controlled PTE (tons/yr) = 0.11 tons/yr

Uncontrolled Potential to Emit

Uncontrolled PTE (tons/yr) = Controlled PTE (tons/year) ÷ (1 - Control Efficiency)
 Uncontrolled PTE (tons/yr) = 0.11 / (1 - 0.99) = 11.04 tons/year
 Uncontrolled PTE (lb/hr) = 11.04 tons/yr X 2,000 lb/ton ÷ 8760 hr/yr
 Uncontrolled PTE (lb/hr) = 2.52 lb/hr
 Uncontrolled PTE (lb/day) = 2.52 lb/hr X 24 hr/day
 Uncontrolled PTE (lb/day) = 60.48 lb/day

Allowable Emissions (326 IAC 6-3-2)

Pursuant to 326 IAC 6-3-2(e)(1): $E = 4.10 P^{0.67}$

where: P = Process weight rate (tons/hr) = 1.0260 tons/hr = 0.1026 tons/hr (per grinder)
 E = Limited Potential to Emit (lb/hr)
 E = 0.89 lb/hr (capable of complying WITH controls)

Methodology

Controlled PTE (lb/hr) = Outlet Grain Loading (grains/acf) * Maximum Air Flow Rate (acfm) * 60 (min/hr) / 7000 (grains/lb)
 Controlled PTE (tons/yr) = Outlet Grain Loading (grains/acf) * Maximum Air Flow Rate (acfm) * 60 (min/hr) / 7000 (grains/lb) * 8760 (hrs/yr) / 2000(lbs/ton)
 Uncontrolled PTE (lb/hr) = Controlled PTE (lb/hr) / (1 - control efficiency)
 Uncontrolled PTE (tons/yr) = Controlled PTE (tons/yr) / (1 - control efficiency)

Appendix A: Emission Calculations
Fugitive Dust Emissions - Paved Roads

Company Name: Patrick Industries, Inc. d/b/a Charleston Corporation
Source Address: 1849 and 1820 Dogwood Road, Bremen, Indiana 46506
MSM and SPM No. 099-38035-00037 and 099-38057-00037
Permit Reviewer: Brian Wright

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) |
|---|------------------------------------|---|----------------------------------|-----------------------------------|---------------------------------------|--------------------------------------|------------------------------------|-----------------------------------|----------------------------------|
| Moving Truck (2-axle) (26' Straight Truck) - Entry and Exit | 5.0 | 2.0 | 10.0 | 10.0 | 100.0 | 375 | 0.071 | 0.7 | 259.2 |
| Freight Truck (5 axles) - Entry and Exit | 5.0 | 2.0 | 10.0 | 40.0 | 400.0 | 375 | 0.071 | 0.7 | 259.2 |
| Totals | | | 20.0 | | 500.0 | | | 1.4 | 518.5 |

Average Vehicle Weight Per Trip = $\frac{25.0}{0.07}$ tons/trip
Average Miles Per Trip = $\frac{375}{0.07}$ miles/trip

Unmitigated Emission Factor, $E_f = [k * (sL)^{0.91} * (W)^{1.02}]$ (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 = | 25.0 | 25.0 | 25.0 | tons = average vehicle weight (provided by source) |
| sL = | 0.6 | 0.6 | 0.6 | g/m ² = silt loading value for paved roads normal baseline conditions - Table 13.2.1-2) |

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

Mitigated Emission Factor, $E_{ext} = E_f * [1 - (p/4N)]$
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, $E_f =$ | 0.184 | 0.037 | 0.0090 | lb/mile |
| Mitigated Emission Factor, $E_{ext} =$ | 0.168 | 0.034 | 0.0083 | 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) |
|---|---------------------------------|-----------------------------------|------------------------------------|-------------------------------|---------------------------------|----------------------------------|
| Moving Truck (2-axle) (26' Straight Truck) - Entry and Exit | 0.024 | 0.005 | 0.001 | 0.022 | 0.004 | 0.001 |
| Freight Truck (5 axles) - Entry and Exit | 0.024 | 0.005 | 0.001 | 0.022 | 0.004 | 0.001 |
| Totals | 0.048 | 0.010 | 0.002 | 0.044 | 0.009 | 0.002 |

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)
Controlled PTE (tons/yr) = [Mitigated PTE (tons/yr)] * [1 - Dust Control Efficiency]

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 - Unpaved Roads**

Company Name: Patrick Industries, Inc. d/b/a Charleston Corporation
Source Address: 1849 and 1820 Dogwood Road, Bremen, Indiana 46506
MSM and SPM No. 099-38035-00037 and 099-38057-00037
Permit Reviewer: Brian Wright

Unpaved Roads at Industrial Site

The following calculations determine the amount of emissions created by unpaved roads, based on 8,760 hours of use and AP-42, Ch 13.2.2 (11/2006).

Vehicle Information (provided by source)

| Type | Maximum number of vehicles | 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) |
|---|----------------------------|---|----------------------------------|-----------------------------------|---------------------------------------|--------------------------------------|------------------------------------|-----------------------------------|----------------------------------|
| Moving Truck (2-axle) (26' Straight Truck) - Entry and Exit | 1.0 | 2.0 | 2.0 | 10.0 | 20.0 | 600 | 0.114 | 0.2 | 83.0 |
| Freight Truck (5 axles) - Entry and Exit | 1.0 | 2.0 | 2.0 | 40.0 | 80.0 | 600 | 0.114 | 0.2 | 83.0 |
| Resin Delivery Freight Truck (5 axles) - Entry and Exit | 1.0 | 2.0 | 2.0 | 40.0 | 80.0 | 350 | 0.066 | 0.1 | 48.4 |
| Pickup Truck - Entry and Exit | 1.0 | 8.0 | 8.0 | 3.2 | 25.6 | 600 | 0.114 | 0.9 | 331.8 |
| Totals | | | 14.0 | | 205.6 | | | 1.5 | 546.1 |

Average Vehicle Weight Per Trip = $\frac{14.7}{1.0}$ tons/trip
 Average Miles Per Trip = $\frac{0.11}{1.0}$ miles/trip

Unmitigated Emission Factor, $E_f = k \cdot [(s/12)^a] \cdot [(W/3)^b]$ (Equation 1a from AP-42 13.2.2)

| | PM | PM10 | PM2.5 | |
|-----------|------|------|-------|---|
| where k = | 4.9 | 1.5 | 0.15 | lb/mi = particle size multiplier (AP-42 Table 13.2.2-2 for Industrial Roads) |
| s = | 6.0 | 6.0 | 6.0 | % = mean % silt content of unpaved roads (AP-42 Table 13.2.2-1 Iron and Steel Production) |
| a = | 0.7 | 0.9 | 0.9 | = constant (AP-42 Table 13.2.2-2 for Industrial Roads) |
| W = | 14.7 | 14.7 | 14.7 | tons = average vehicle weight (provided by source) |
| b = | 0.45 | 0.45 | 0.45 | = constant (AP-42 Table 13.2.2-2 for Industrial Roads) |

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, $E_{ext} = E_f \cdot [(365 - P)/365]$ (Equation 2 from AP-42 13.2.2)

Mitigated Emission Factor, $E_{ext} = E_f \cdot [(365 - P)/365]$
 where P = 125 days of rain greater than or equal to 0.01 inches (see Fig. 13.2.2-1)

| | PM | PM10 | PM2.5 | |
|--|------|------|-------|---------|
| Unmitigated Emission Factor, $E_f =$ | 6.16 | 1.64 | 0.16 | lb/mile |
| Mitigated Emission Factor, $E_{ext} =$ | 4.05 | 1.08 | 0.11 | 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) |
|---|---------------------------------|-----------------------------------|------------------------------------|-------------------------------|---------------------------------|----------------------------------|
| Moving Truck (2-axle) (26' Straight Truck) - Entry and Exit | 0.26 | 0.07 | 0.01 | 0.17 | 0.04 | 0.00 |
| Freight Truck (5 axles) - Entry and Exit | 0.26 | 0.07 | 0.01 | 0.17 | 0.04 | 0.00 |
| Resin Delivery Freight Truck (5 axles) - Entry and Exit | 0.15 | 0.04 | 0.00 | 0.10 | 0.03 | 0.00 |
| Pickup Truck - Entry and Exit | 1.02 | 0.27 | 0.03 | 0.67 | 0.18 | 0.02 |
| Totals | 1.68 | 0.45 | 0.04 | 1.11 | 0.29 | 0.029 |

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)
 Controlled PTE (tons/yr) = (Mitigated PTE (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



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

February 7, 2017

Tony Swihart
Patrick Industries, Inc. d/b/a Charleston Corporation
PO Box 5
Bremen, IN 46506-0005

Re: Public Notice
Patrick Industries, Inc. d/b/a Charleston Corp
Permit Level: Title V - Significant Permit

Modification

Permit Number: 099 - 38057 - 00037

Dear Tony Swihart:

Enclosed is a copy of your draft Title V - Significant Permit Modification, Technical Support Document, emission calculations, and the Public Notice which will be printed in your local newspaper.

The Office of Air Quality (OAQ) has prepared two versions of the Public Notice Document. The abbreviated version will be published in the newspaper, and the more detailed version will be made available on the IDEM's website and provided to interested parties. Both versions are included for your reference. The OAQ has requested that the Plymouth Pilot News in Plymouth, Indiana publish the abbreviated version of the public notice no later than February 11, 2017. You will not be responsible for collecting any comments, nor are you responsible for having the notice published in the newspaper.

OAQ has submitted the draft permit package to the Bremen Public Library, 304 N Jackson St in Bremen IN. As a reminder, you are obligated by 326 IAC 2-1.1-6(c) to place a copy of the complete permit application at this library no later than ten (10) days after submittal of the application or additional information to our department. We highly recommend that even if you have already placed these materials at the library, that you confirm with the library that these materials are available for review and request that the library keep the materials available for review during the entire permitting process.

Please review the enclosed documents carefully. This is your opportunity to comment on the draft permit and notify the OAQ of any corrections that are needed before the final decision. Questions or comments about the enclosed documents should be directed to Brian Wright, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension 4-6544 or dial (317) 234-6544.

Sincerely,
Len Pogost

Len Pogost
Permits Branch
Office of Air Quality

Enclosures
PN Applicant Cover letter 1/9/2017



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Eric J. Holcomb
Governor

Bruno Pigott
Commissioner

ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING

February 7, 2017

Plymouth Pilot News
Attn: Classifieds
P.O. Box 220
Plymouth, IN 46563

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for Patrick Industries, Marshall County, Indiana.

Since our agency must comply with requirements which call for a Notice of Public Comment, we request that you print this notice one time, no later than February 11, 2017.

Please send a notarized form, clippings showing the date of publication, and the billing to the Indiana Department of Environmental Management, Accounting, Room N1345, 100 North Senate Avenue, Indianapolis, Indiana, 46204.

To ensure proper payment, please reference account # 100174737.

We are required by the Auditor's Office to request that you place the Federal ID Number on all claims. If you have any conflicts, questions, or problems with the publishing of this notice or if you do not receive complete public notice information for this notice, please call Len Pogost at 800-451-6027 and ask for extension 3-2803 or dial 317-233-2803.

Sincerely,

Len Pogost

Len Pogost
Permit Branch
Office of Air Quality

Permit Level: Title V - Significant Permit Modification
Permit Number: 099 - 38057 - 00037

Enclosure

PN Newspaper.dot 1/9/2017



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

February 7, 2017

To: Bremen Public Library 304 N Jackson St Bremen IN

From: Matthew Stuckey, Branch Chief
Permits Branch
Office of Air Quality

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

Applicant Name: Patrick Industries, Inc. d/b/a Charleston Corporation
Permit Number: 099 - 38057 - 00037

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

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

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

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

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

Enclosures
PN Library.dot 1/9/2017



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Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

Notice of Public Comment

February 7, 2017

Patrick Industries, Inc. d/b/a Charleston Corporation

099 - 38057 - 00037

Dear Concerned Citizen(s):

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

Enclosed is a Notice of Public Comment, which has been placed in the Legal Advertising section of your local newspaper. The application and supporting documentation for this proposed permit have been placed at the library indicated in the Notice. These documents more fully describe the project, the applicable air pollution control requirements and how the applicant will comply with these requirements.

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

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

Enclosure
PN AAA Cover.dot 1/9/2017



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

100 N. Senate Avenue • Indianapolis, IN 46204

(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

AFFECTED STATE NOTIFICATION OF PUBLIC COMMENT PERIOD DRAFT INDIANA AIR PERMIT

February 7, 2017

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

Permit Number: 099 - 38057 - 00037
Applicant Name: Patrick Industries, Inc. d/b/a Charleston Corporation
Location: Bremen, Marshall County, Indiana

The public notice, draft permit and technical support documents can be accessed via the **IDEM Air Permits Online** site at:

<http://www.in.gov/ai/appfiles/idem-caats/>

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

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

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

Affected States Notification.dot 1/9/2017

Mail Code 61-53

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| IDEM Staff | LPOGOST 2/7/2017 Patrick Industries Inc dba Charleston Corp 099 - 38057d & 38035f - 00037 | | 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 | Type of Mail: CERTIFICATE OF MAILING ONLY | |

| 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 | | Tony Swihart, Patrick Industries Incorporated dba Charleston Cor PO Box 5 Bremen IN 46506-0005 (Source CAATS) Via EMS | | | | | | | | | | |
| 2 | | Bremen Public Library 304 N Jackson St Bremen IN 46506-1130 (Library) | | | | | | | | | | |
| 3 | | Marshall County Commissioners 112 West Jefferson Street Plymouth IN 46563 (Local Official) | | | | | | | | | | |
| 4 | | Bremen Town Council and Town Manager 111 South Center Street Bremen IN 46506 (Local Official) | | | | | | | | | | |
| 5 | | Marshall County Health Department 112 W Jefferson Street, Suite 103 Plymouth IN 46563-1764 (Health Department) | | | | | | | | | | |
| 6 | | LaPaz Town Council PO Box 0820 LaPaz IN 46537 (Local Official) | | | | | | | | | | |
| 7 | | Ms. Julie Grzesiak 139 N. Michigan St. Argos IN 46501 (Affected Party) | | | | | | | | | | |
| 8 | | Mr. Kevin Parks D & B Environmental Services, Inc. 401 Lincoln Way West Osceola IN 46561 (Consultant) | | | | | | | | | | |
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