

Ms. Ruthann Tucker
Kreider Manufacturing, Inc.
405 Gerber Street
Ligonier, Indiana 46767

Re: AAT 113-10174
First Administrative Amendment to
Part 70 Operating Permit 113-6053-00036

Dear Ms. Tucker:

Kreider Manufacturing, Inc., was issued a Part 70 Operating Permit on March 31, 1998, for a stationary gel coat and resin/fiberglass application plant for the production of custom RV parts. A letter requesting changes to the descriptive information of the facilities listed in Section A.2 of the Part 70 Operating Permit was received on September 21, 1998. These changes consist of the replacement of two (2) chop resin spray guns with two (2) chop resin flow coating guns. Construction of this equipment replacement was approved under a 1265 Exemption Qualification Letter (EQ-113-9976) issued on September 3, 1998. Based on your request to amend your Part 70 Operating Permit and the previous construction approval issued by the OAM, the permit shall be amended as follows (bold emphasis added to highlight new language):

1. The description of the chop resin gun designated EU02 listed in Section A.2 as Item (2) on Page 4 of 35 of the permit shall be amended as follows:
 - (2) One (1) **airless flow coat** resin/fiberglass ~~chop~~ applicator, identified as EU02, with the maximum capacity to process 8.7 units per hour, with dry filters for control, exhausting to four (4) 21470 acfm through-the-wall fans, identified as S/V-1, S/V-2, S/V-3, and S/V-4.

2. The description of the chop resin gun designated EU04 listed in Section A.2 as Item (4) on Page 4 of 35 of the permit shall be amended as follows:
 - (4) One (1) **airless flow coat** resin/fiberglass ~~chop~~ applicator, identified as EU04, constructed in 1978, with the maximum capacity to process 8.7 units per hour, with dry filters for control, exhausting to four (4) 21470 acfm through-the-wall fans, identified as S/V-1, S/V-2, S/V-3, and S/V-4.

3. The description of the chop resin gun designated EU02 listed in Section D.1 as Item (2) shall be amended as follows to correspond to the changes in Section A.2 detailed above:
 - (2) One (1) ~~airless flow coat~~ resin/fiberglass ~~chop~~ applicator, identified as EU02, with the maximum capacity to process 8.7 units per hour, with dry filters for control, exhausting to four (4) 21470 acfm through-the-wall fans, identified as S/V-1, S/V-2, S/V-3, and S/V-4.
4. The description of the chop resin gun designated EU04 listed in Section D.1 as Item (4) shall be amended as follows to correspond to the changes in Section A.2 detailed above:
 - (4) One (1) ~~airless flow coat~~ resin/fiberglass ~~chop~~ applicator, identified as EU04, constructed in 1978, with the maximum capacity to process 8.7 units per hour, with dry filters for control, exhausting to four (4) 21470 acfm through-the-wall fans, identified as S/V-1, S/V-2, S/V-3, and S/V-4.
5. During review of the requested Amendment to the Part 70 Operating Permit a typographical error was noted in the Quarterly Report included as Page 34 of 35 of the Part 70 Operating Permit. The report form only lists emission units EU01 and EU02 when it should list units EU01, EU02, EU03, EU04 and EU06 as specified in the limiting condition D.1.1 to which the form relates. The following change shall be made to the unit description of the Quarterly Report form to correct this error:

Source Name:	Kreider Manufacturing, Inc.
Source Address:	405 Gerber Street, Ligonier, Indiana 46767
Mailing Address:	405 Gerber Street, Ligonier, Indiana 46767
Part 70 Permit No.:	113-6053-00036
Facility:	EU01, and EU02, EU03, EU04 and EU06
Parameter:	VOC
Limit:	8.25 tons per month

These changes are allowed as an administrative amendment to the Part 70 Operating Permit pursuant to 326 IAC 2-7-11 (Administrative permit amendments) because they revise descriptive information and correct a typographical error where the changes do not trigger a new applicable requirement or violate a permit term.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment with the original permit.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

JKJ

enclosure: amended Part 70 Operating Permit pages (4 pages)

cc: File - Noble County
Noble County Health Department
Air Compliance Section Inspector - Doyle Houser
Compliance Data Section - Jerri Curless
Permit Tracking - Janet Mobley
Air Programs Section - Nancy Landau

**PART 70 OPERATING PERMIT
and Enhanced New Source Review (ENSR)
OFFICE OF AIR MANAGEMENT**

**Kreider Manufacturing, Inc.
405 Gerber Street
Ligonier, Indiana 46767**

(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.

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 and 326 IAC 2-1-3.2 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.: T113-6053-00036	
Issued by: Felicia R. George, Assistant Commissioner Office of Air Management	Issuance Date: March 31, 1998
Operation Permit No.: AAT 113-10174	
Issued by: Janet McCabe, Assistant Commissioner Office of Air Management	Pages Affected: 4, 27 and 34 Issuance Date:

SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM), and presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary gel coat and resin/fiberglass application plant for the production of custom RV parts.

Responsible Official: Richard Kreider
Source Address: 405 Gerber Street, Ligonier, Indiana 46767
Mailing Address: 405 Gerber Street, Ligonier, Indiana 46767
SIC Code: 3713
County Location: Noble
County Status: Attainment for all criteria pollutants
Source Status: Part 70 Permit Program
Minor Source, under PSD Rules;
Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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

- (1) One (1) airless gel coat applicator identified as EU01, with the maximum capacity to coat 8.7 units per hour, using dry filters for control, exhausting to four (4) 21470 acfm through-the-wall fans, identified as S/V-1, S/V-2, S/V-3, and S/V-4.
- (2) One (1) flow coat resin/fiberglass applicator, identified as EU02, with the maximum capacity to process 8.7 units per hour, with dry filters for control, exhausting to four (4) 21470 acfm through-the-wall fans, identified as S/V-1, S/V-2, S/V-3, and S/V-4.
- (3) One (1) airless gel coat applicator identified as EU03, constructed in 1978, with the maximum capacity to coat 8.7 units per hour, using dry filters for control, exhausting to four (4) 21470 acfm through-the-wall fans, identified as S/V-1, S/V-2, S/V-3, and S/V-4.
- (4) One (1) flow coat resin/fiberglass applicator, identified as EU04, constructed in 1978, with the maximum capacity to process 8.7 units per hour, with dry filters for control, exhausting to four (4) 21470 acfm through-the-wall fans, identified as S/V-1, S/V-2, S/V-3, and S/V-4.
- (5) One (1) air atomized spray gun, identified as EU05, constructed in 1978, with the maximum capacity to paint 2.61 units per hour, with dry filters for control, exhausting to four (4) 21470 acfm through-the-wall fans, identified as S/V-1, S/V-2, S/V-3, and S/V-4.
- (6) One (1) vertical resin storage tank, constructed in 1978, with a maximum capacity of 5618 gallons, identified as EU06. The throughput is 45,293 gallons per year of styrene.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

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

- (1) The following equipment related to manufacturing activities not resulting in the emission of HAP's: brazing equipment, cutting torches, soldering equipment, welding equipment.

SECTION D.1 FACILITY OPERATION CONDITIONS

- (1) One (1) airless gel coat applicator identified as EU01, with the maximum capacity to coat 8.7 units per hour, using dry filters for control, exhausting to four (4) 21470 acfm through-the-wall fans, identified as S/V-1, S/V-2, S/V-3, and S/V-4.
- (2) One (1) flow coat resin/fiberglass applicator, identified as EU02, with the maximum capacity to process 8.7 units per hour, with dry filters for control, exhausting to four (4) 21470 acfm through-the-wall fans, identified as S/V-1, S/V-2, S/V-3, and S/V-4.
- (3) One (1) airless gel coat applicator identified as EU03, constructed in 1978, with the maximum capacity to coat 8.7 units per hour, using dry filters for control, exhausting to four (4) 21470 acfm through-the-wall fans, identified as S/V-1, S/V-2, S/V-3, and S/V-4.
- (4) One (1) flow coat resin/fiberglass applicator, identified as EU04, constructed in 1978, with the maximum capacity to process 8.7 units per hour, with dry filters for control, exhausting to four (4) 21470 acfm through-the-wall fans, identified as S/V-1, S/V-2, S/V-3, and S/V-4.
- (5) One (1) air atomized spray gun, identified as EU05, constructed in 1978, with the maximum capacity to paint 2.61 units per hour, with dry filters for control, exhausting to four (4) 21470 acfm through-the-wall fans, identified as S/V-1, S/V-2, S/V-3, and S/V-4.
- (6) One (1) vertical resin storage tank, constructed in 1978, with a maximum capacity of 5618 gallons, identified as EU06. The throughput is 45,293 gallons per year of styrene.

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

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

Pursuant to CP No. 113-2952-00036, issued on December 7, 1994, the VOC input to EU01, EU02, EU03, EU04 and EU06 is limited to 8.25 tons of VOC per month, including coatings, dilution solvents, and cleaning solvents. This usage limit is required to limit the potential to emit of VOC to 99 tons per 365 consecutive day period. Compliance with this limit makes 326 IAC 8-6 not applicable. Also compliance with this limit in conjunction with Condition D.1.2 makes 326 IAC 2-2 (PSD) not applicable.

D.1.2 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the PM from EU01, EU02, EU03, EU04 and EU05 shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for EU01, EU02, EU03, EU04 and EU05 and any control devices.

Compliance Determination Requirements

D.1.4 Testing Requirements [326 IAC 2-7-6(1)]

Testing of EU01, EU02, EU03, EU04, EU05 and EU06 is not specifically required by this permit.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR MANAGEMENT COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Kreider Manufacturing, Inc.
Source Address: 405 Gerber Street, Ligonier, Indiana 46767
Mailing Address: 405 Gerber Street, Ligonier, Indiana 46767
Part 70 Permit No.: 113-6053-00036
Facility: EU01, EU02, EU03, EU04 and EU06
Parameter: VOC
Limit: 8.25 tons per month

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

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

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