Mr. Mark Schafer Harris Kayot 2801 West State Boulevard Ft. Wayne, IN 46808

> Re: 003-10574-00177 First Minor Permit Revision to Part 70 No.: T 003-7743-00177

Dear Mr. Schafer:

Harris Kayot has a pending Part 70 Permit to be issued for fiberglass boat fabrication operation. A letter requesting changes to this permit was received on January 26, 1999. Pursuant to the provisions of 326 IAC 2-7-12 a minor permit revision to this permit is hereby approved as described in the attached Technical Support Document.

The revision consists of the removal of Conditions D.3.4, D.3.6, and D.3.8. All subsequent conditions in this section have been renumbered accordingly.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification and the following revised permit pages to the front of the original permit.

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 Scott Fulton, OAM, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call at (800) 451-6027, press 0 and ask for Scott Fulton or extension (3-5693), or dial (317) 233-5693.

Sincerely,

Paul Dubenetzky, Chief Permits Branch Office of Air Management

SDF

cc: File - Allen County U.S. EPA, Region V Allen County Health Department Air Compliance Section Inspector - Jennifer Schick Compliance Data Section - Jerri Curless Administrative and Development - Janet Mobley Technical Support and Modeling - Nancy Landau

PART 70 OPERATING PERMIT and ENHANCED NEW SOURCE REVIEW

OFFICE OF AIR MANAGEMENT

Harris Kayot, Inc. 2801 West State Boulevard Fort Wayne, Indiana 46808

(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.: T003-7743-00177	
Issued by: Felicia R. George, Assistant Commissioner Office of Air Management	Issuance Date: December 31, 1998
First Minor Revision 003-10574-00177	Affected Pages: 4, 35, 36, 37
Issued by: Janet Mc Cabe, Assistant Commissioner Office of Air Management	Issuance Date:

	Compliance Monitoring Requirements[326 IAC 2-7-6(1)][326 IAC 2-7-5(1)]D.2.5Visible Emissions Notations31
	D.2.6 Parametric Monitoring
	D.2.7 Baghouse Inspections
	D.2.8 Broken Bag or Failure Detection
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	D.2.9 Record Keeping Requirements
D.3	FACILITY OPERATION CONDITIONS - Specifically regulated insignificant activities 33
	Emission Limitations and Standards [326 IAC 2-7-5(1)]
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	D.3.3 Particulate Matter (PM) [326 IAC 6-3] 33
	D.3.4 Volatile Organic Compound (VOC) Limit
	D.3.54 Degreaser[326 IAC 8-3-5]
	D.3.6 Degreaser VOC Usage Limit .
	Compliance Determination Requirements
	D.3.75 Testing Requirements [326 IAC 2-7-6(1)]
	- D.3.8 Record Keeping Requirements
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Quart	terly Compliance Monitoring Report 40

D.3.4 Volatile Organic Compound (VOC) Limit

The adhesive spray operations shall emit VOC at a rate less than 15 pounds per day in order to remain exempt from the requirements of 326 IAC 8-1-6.

D.3.54 Degreaser [326 IAC 8-3-5]

- (1) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:
 - (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kilopascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.
 - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kilopascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
 - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
 - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
 - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kilopascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.

- (C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:
 - (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

D.3.6 Degreaser VOC Usage Limit

The degreasing operations shall emit VOC at a rate less than 15 pounds per day in order to remain exempt from the requirements of 326 IAC 8-1-6.

Compliance Determination Requirement

D.3.75 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility (the 7.0 million British thermal units per hour boiler, the welding facilities, or the glue application guns) by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the particulate matter limits specified in Conditions D.3.1, D.3.2, and D.3.3 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Record Keeping

D.3.8 Record Keeping Requirements

0.5.0	Record	псееріп	y Requirements
	(a)	records shall be	sument compliance with Conditions D.3.4 and D.3.6, the Permittee shall maintain to in accordance with (1) through (5) below. Records maintained for (1) through (5) to taken monthly and shall be complete and sufficient to establish compliance with We allowable usage level established in Conditions D.3.4 and D.3.6.
		(1)	The amount and VOC content of each adhesive, solvent, and degreasing solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used Solvent usage records shall differentiate between those added to adhesives and those used as cleanup solvents;
		(2)	A log of the month of use;
		(3)	The cleanup solvent usage for each month;
		(4)	The total VOC usage for each month; and
		(5)	The weight of VOCs emitted for each compliance period.

Harris Kayot, Inc. First Minor Permit Revision Fort Wayne, Indiana Permit Reviewer: Holly M. Stockrahm, Modified by SDF Page 37 of 41 OP No. T003-7743-00177

(b)	- To document compliance with Condition D.3.3, the Permittee shall maintain a log of daily
	overspray observations, daily and weekly inspections, and those additional inspections
	prescribed by the Preventive Maintenance Plan.
(c) (c) (c) (c) (c) (c) (c) (c) (c) (c) 	All records shall be maintained in accordance with Section C - General Record Keeping
	Requirements, of this permit.