

April 19, 2002

Mr. Marvin Short
Cameo Marble
540 Central Court
New Albany, Indiana 47150

Re: 043-14973-00024
Significant Source Modification to:
Part 70 permit No.: T043-7086-00024

Dear Mr. Short:

Cameo Marble was issued a Part 70 operating permit T043-7086-00024 on September 8, 2000 for a synthetic marble products manufacturing facility. An application was received on September 18, 2001. Pursuant to 326 IAC 2-7-10.5, increased emission limits are approved for the following source:

- (a) One (1) spray booth for spraying gel coat onto fiberglass molds, identified as EU#1, utilizing one (1) spray gun capable of operating in either non-atomized or HVLP mode, with a maximum capacity of 1171 pounds per hour of units coated, with dry filters for particulate matter overspray control, exhausting to two (2) stacks, identified as S-1 and S-2. (Constructed in 1986)
- (b) One (1) grinding booth, identified as EU#2, with a maximum capacity of 1057 pounds per hour, with one (1) Eurovac system used for particulate matter control, exhausting internally. (Constructed in 1986)
- (c) One (1) Pour Department (marble casting operation), identified as EU#3, with a maximum capacity of 1171 pounds per hour of units coated, consisting of one (1) Respecta mixing machine, with a maximum matrix output of 3000 pounds per hour, exhausting to one (1) stack, identified as S-4. (Constructed in 1986)
- (d) One (1) mold maintenance repair operation, identified as EU#4, exhausting to one (1) stack identified as S-5. (Constructed in 1986)

The following construction conditions are applicable to the proposed project:

General Construction Conditions

1. The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Management (OAM).
2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

3. Effective Date of the Permit
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.
4. Pursuant to 326 IAC 2-1.1-9 and 326 IAC 2-7-10.5(i), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.
5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.
6. Pursuant to 326 IAC 2-7-10.5(l) the emission units constructed under this approval shall not be placed into operation prior to revision of the source's Part 70 Operating Permit to incorporate the required operation conditions.

This significant source modification authorizes construction of the new emission units. Operating conditions shall be incorporated into the Part 70 operating permit as a significant permit modification in accordance with 326 IAC 2-7-10.5(l)(2) and 326 IAC 2-7-12. Operation at the increased emission limit are not approved until the significant permit modification has been issued.

Pursuant to Contract No. A305-0-00-36, IDEM, OAQ has assigned the processing of this application to Eastern Research Group, Inc., (ERG). Therefore, questions should be directed to Mike Heaney, ERG, 1600 Perimeter Park Drive, Morrisville, North Carolina 27560, or call (919) 468-7870 to speak directly to Mr. Heaney. Questions may also be directed to Duane Van Laningham at IDEM, OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call (800) 451-6027, press 0 and ask for Duane Van Laningham, or extension 3-6878, or dial (317) 233-6878.

Sincerely,
Original signed by

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments
ERG/MH

cc: File - Floyd County
Floyd County Health Department
Air Compliance Section Inspector - Raymond Schick
Compliance Data Section - Karen Nowak
Administrative and Development - Sara Cloe
Technical Support and Modeling - Michele Boner

PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**Cameo Marble
540 Central Court
New Albany, Indiana 47150**

(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 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.: T043-7086-00024	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date:

Significant Source Modification Permit No.: 043-14973-00024	Pages affected: all
Issued by: Original signed by Paul Dubenetzky, Permits Branch Chief Office of Air Quality	Issuance Date: April 19, 2002

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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(15)]

The Permittee owns and operates a stationary gel coating, molding and grinding operation.

Responsible Official: Marvin Short
Source Address: 540 Central Court, New Albany, Indiana 47150
Mailing Address: 540 Central Court, New Albany, Indiana 47150
Phone Number: (812) 944-5055
SIC Code: 3088
County Location: Floyd
County Status: Nonattainment for Ozone
Attainment for all other criteria pollutants
Source Status: Part 70 Permit Program
Minor Source, under PSD and Emission Offset 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:

- (a) One (1) spray booth for spraying gel coat onto fiberglass molds, identified as EU#1, utilizing one (1) spray gun capable of operating in either non-atomized or HVLP mode, with a maximum capacity of 1171 pounds per hour of units coated, with dry filters for particulate matter overspray control, exhausting to two (2) stacks, identified as S-1 and S-2. (Constructed in 1986)
- (b) One (1) grinding booth, identified as EU#2, with a maximum capacity of 1057 pounds per hour, with one (1) Eurovac system used for particulate matter control, exhausting internally. (Constructed in 1986)
- (c) One (1) Pour Department, identified as EU#3, with a maximum capacity of 1171 pounds per hour of units coated, consisting of one (1) Respecta mixing machine, with a maximum matrix output of 3000 pounds per hour, exhausting to one (1) stack, identified as S-4. (Constructed in 1986)
- (d) One (1) mold maintenance repair operation, identified as EU#4, exhausting to one (1) stack identified as S-5. (Constructed in 1986)

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):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:

- (1) Five (5) natural gas fired furnaces, each with maximum heat input capacities of 0.1 million Btu per hour.
 - (2) Four (4) natural gas fired furnaces, each with maximum heat input capacities of 0.18 million Btu per hour.
 - (3) One (1) natural gas fired furnace with a maximum heat input capacity of 0.08 million Btu per hour.
- (b) Machining where an aqueous cutting coolant continuously floods the machine interface.
- (c) Cleaners and solvents characterized as follows:
- (1) Having a vapor pressure equal to or less than 2 kPa; 15 mm Hg; or 0.3 psi measured at 38 degrees C (100EF) or;
 - (2) Having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20EC (68EF); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (d) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs.
- (e) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (f) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals measured at 38 degrees C.
- (g) Other activities or categories not previously identified:

Insignificant Thresholds:

Lead (Pb) = 0.6 ton/year or 3.29 lbs/day Carbon Monoxide (CO) = 25 lbs/day
Sulfur Dioxides (SO₂) = 5 lbs/hour or 25 lbs/day Particulate Matter (PM) = 5 lbs/hour or 25 lbs/day
Nitrogen Oxides (NO_x) = 5 lbs/hour or 25 lbs/day Volatile Organic compounds (VOC) = 3 lbs/hr or 15 lbs/day

- (1) Calcium carbonate receiving (by rail and truck).
- (2) Calcium carbonate storage (in silo with capacity of 118 tons).
- (3) Two (2) 6000 gallon polyester resin storage tanks.
- (4) One (1) mold maintenance set-up and gun cleaning operation, identified as EU#5, with a maximum acetone usage of 3.6 pounds per hour, exhausting to one (1) stack, identified as S-6. (Constructed in 1986)

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary or portable source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

- (a) Indiana statutes from IC 13 and rules from 326 IAC, quoted 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.
- (b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled "Permit Shield."

B.2 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, any applicable definitions found in IC 13-11, 326 IAC 1-2 and 326 IAC 2-7 shall prevail.

B.3 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the original date, 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.

B.4 Enforceability [326 IAC 2-7-7(a)]

- (a) All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM.
- (b) Unless otherwise stated, terms and conditions of this permit, including any provisions to limit the source's potential to emit, are enforceable by the United States Environmental Protection Agency (U.S. EPA) and citizens under the Clean Air Act.

B.5 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.6 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.7 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.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) 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.
- (c) Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAQ, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAQ, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit, except those specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act and is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; or
 - (3) Denial of a permit renewal application.
- (b) 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.

B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.11 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. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

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 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 compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]
[326 IAC 1-6-3]

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, 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;
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP 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 Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that failure to implement the Preventive Maintenance Plan does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAQ, upon request and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its Preventive Maintenance Plan whenever lack of proper maintenance causes or contributes to any violation.

B.13 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, 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 Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967
 - (5) For each emergency lasting one (1) hour or more, the Permittee submitted notice, either in writing or facsimile, of the emergency to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (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) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) 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 compliance 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.14 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 in 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, including any term or condition from a previously issued construction or operation permit, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false,

or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
- (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(7)]

B.15 Prior Permit Conditions Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either
- (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted
- by this permit.
- (b) All previous registrations and permits are superseded by this permit.

B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. 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.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
- (c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

B.17 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 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)]
- (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.18 Permit Renewal [326 IAC 2-7-4]

- (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(40).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015

Indianapolis, Indiana 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
- (1) A timely renewal application is one that is:
- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
- (B) 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.
- (2) If IDEM, OAQ, upon receiving a timely and complete 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.
- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
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 in writing by IDEM, OAQ, any additional information identified as being needed to process the application.
- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAQ, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) The Permittee must comply with 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
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015
- Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule.
- (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.20 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 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)(D)(i) 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.21 Operational Flexibility [326 IAC 2-7-20]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), 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 approval required by 326 IAC 2-1.1 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under 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
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

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 which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes 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), (c)(1), and (e)(2).

- (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(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:
- (1) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).
 - (2) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:
 - (i) A brief description of the change within the source;
 - (ii) The date on which the change will occur;
 - (iii) Any change in emissions; and
 - (iv) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in 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.22 Construction Permit Requirement [326 IAC 2]

A modification, construction, or reconstruction shall be approved if required by and in accordance with the applicable provisions of 326 IAC 2.

B.23 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.
[326 IAC 2-7-6(6)]

B.24 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
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (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.25 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. 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 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

- C.1 **Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]**
Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour 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 5-1-3 (Temporary Exemptions), 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. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.
- C.4 **Incineration [326 IAC 4-2][326 IAC 9-1-2]**
The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. The provisions of 326 IAC 9-1-2 are not federally enforceable.
- 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 **Operation of Equipment [326 IAC 2-7-6(6)]**
Except as otherwise provided in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.
- C.7 **Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]**
- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(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
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

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 by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (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 14-10-4, 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) **Indiana Accredited 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 Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited, pursuant to the provisions of 40 CFR 61, Subpart M, is federally enforceable.

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

C.8 Performance Testing [326 IAC 3-6]

-
- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable

procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAQ within forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

C.9 Compliance Schedule [326 IAC 2-7-6(3)]

The Permittee:

- (a) Has certified that all facilities at this source are in compliance with all applicable requirements; and
- (b) Has submitted a statement that the Permittee will continue to comply with such requirements; and
- (c) Will comply with such applicable requirements that become effective during the term of this permit.

C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Compliance with applicable requirements shall be documented as required by this permit. All monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, 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 Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

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 the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.11 Monitoring Methods [326 IAC 3]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

(a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ninety (90) days after the date of issuance of this permit.

The ERP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

(d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

(e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

(f) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

(a) Submit:

(1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or

(2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of

40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and

- (3) A verification to IDEM, OAQ, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.
- (b) Provide annual certification to IDEM, OAQ, that the Risk Management Plan is being properly implemented.

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.14 Compliance Response Plan - Preparation, Implementation, Records, and Reports
[326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:
 - (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.
 - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
 - (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
 - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
 - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.
 - (4) Failure to take reasonable response steps shall constitute a violation of the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:

- (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.
 - (3) An automatic measurement was taken when the process was not operating.
 - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
 - (e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
 - (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
[326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) 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 documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

- (1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
 - (2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:
- Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) The annual emission statement 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.17 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]

- (a) With the exception of performance tests conducted in accordance with Section C- Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAQ, representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon

request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

- (b) Records of required monitoring information shall include, where applicable:
 - (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
 - (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of preventive maintenance shall be sufficient to demonstrate that failure to implement the Preventive Maintenance Plan did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported. The Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015

Indianapolis, Indiana 46206-6015

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period. The reports do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports. The Emergency/Deviation Occurrence Report does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

Stratospheric Ozone Protection

C.20 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 the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

- (a) One (1) spray booth for spraying gel coat onto fiberglass molds, identified as EU#1, utilizing one (1) spray gun capable of operating in either non-atomized or HVLP mode, with a maximum capacity of 1171 pounds per hour of units coated, with dry filters for particulate matter overspray control, exhausting to two (2) stacks, identified as S-1 and S-2. (Constructed in 1986)
- (b) One (1) grinding booth, identified as EU#2, with a maximum capacity of 1057 pounds per hour, with one (1) Eurovac system used for particulate matter control, exhausting internally. (Constructed in 1986)
- (c) One (1) Pour Department, identified as EU#3, with a maximum capacity of 1171 pounds per hour of units coated, consisting of one (1) Respecta mixing machine, with a maximum matrix output of 3000 pounds per hour, exhausting to one (1) stack, identified as S-4. (Constructed in 1986)
- (d) One (1) mold maintenance repair operation, identified as EU#4, exhausting to one (1) stack identified as S-5. (Constructed in 1986)

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

D.1.1 General Reduction Requirements for New Facilities [326 IAC 8-1-6]

The spray booth, identified as EU#1, the pour department, identified as EU#3, and mold repair operation, identified as EU#4, including all cleanup-solvent usage, are subject to the requirements of 326 IAC 8-1-6 which requires that the Best Available Control Technology (BACT) be used to control VOC emissions. BACT for these emission units shall be a limitation on the potential to emit VOCs of fifty (50) tons per twelve (12) consecutive month period and compliance with the following requirements:

- (a) Compliance with the VOC limit shall be determined as follows:
 - (1) VOC emissions from gel coat application in the spray booth (EU#1) and mold repair (EU#4) shall be determined by multiplying the usage by weight of each gel coat by the emission factor that is appropriate for the styrene and/or methyl methacrylate monomer content for each gel coat, and summing the emissions for all gel coats.
 - (A) Emission factors shall be obtained from the following reference approved by IDEM, OAQ: "Unified Emission Factors for Open Molding of Composites: Gelcoat Application (styrene and methyl methacrylate content in gelcoat)," Composites Fabricators Association, July 2001 addendum. This reference is included with this permit.
 - (B) For the purposes of these emission calculations, organic monomer in gel coats that is not styrene or methyl methacrylate shall be considered as styrene on an equivalent weight basis.
 - (2) Monomer emissions from the marble casting operation in the Pour Department (EU#3) shall be determined by multiplying the usage by weight of each resin by the monomer content of the resin and by the appropriate emission factor, and summing the emissions for all resins.

The emission factor for the marble casting operation shall be 3.0% styrene emitted per weight of styrene monomer contained in the resin applied.

- (3) MEK emissions from the marble casting operation in the Pour Department (EU#3) shall be determined by multiplying the usage by weight of the catalyst by the MEK content of the catalyst.
 - (4) Cleanup solvent emissions shall be calculated by subtracting VOC contained in the clean-up waste from the amount of solvent applied.
 - (5) Total VOC emissions shall be calculated as the sum of emissions from EU#1, EU#3, EU#4 and clean-up solvents..
- (b) The total HAP monomer content of the following materials shall be limited depending on the application method and products produced as specified in the following tables:

	HAP Monomer Content, wt. %
Resin (filled \$35% by weight)	38
Clear gel coat, subject to ANSI ^a standards	50
Pigmented gel coat, subject to ANSI ^a standards	45
Clear gel coat, non-ANSI ^a	44
Pigmented gel coat, non-ANSI ^a	37
Tooling (mold repair)	45

^aAmerican National Standards Institute.

- (c) Gel coat application shall be by the following spray technologies:
- (1) For light-colored gel coat: Nonatomized spray or an equivalent emission reduction technology approved by the commissioner.
 - (2) For dark-colored or clear gel coat: HVLP using the minimum amount of atomization necessary to meet product appearance standards or an equivalent emission reduction technology approved by the commissioner.
- (d) Cleaning operations for resin and gel coat application equipment shall be as follows:
- (1) For routine flushing of resin and gel coat application equipment such as spray guns, flowcoaters, brushes, rollers, and squeegees, a cleaning solvent shall contain no HAPs. This standard does not apply to solvents used for removing cured resin or gel coat from application equipment.
 - (2) A source must store HAP containing solvents used for removing cured resin or gel coat in containers with covers. The covers must have no visible gaps and must be in place at all times, except when equipment is placed in or removed from the container.
 - (3) Recycled cleaning solvents that contain less than or equal to five percent (5%) HAP by weight are considered to contain no HAP for the purposes of this subsection.

- (e) The owner or operator of a source subject to this rule may comply with this section using monthly emission averaging within each resin or gel coat application category listed in subsection (b) without prior approval by the commissioner.

For averaging within a category:

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

Where:

M_R = Total monthly mass of material within each category

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

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

- (f) Upon written application by the source, the commissioner may approve the following:
- (1) Enforceable alternative emission reduction techniques that are at least equally protective of the environment as the emission standards in subsections (b) through (d).
 - (2) Use of monthly emissions averaging for any or all material or application categories listed in subsection (b) if the following conditions are met:
 - (A) The source shows that emissions did not exceed the emissions that would have occurred if each emission unit had met the requirements of subsections (b) through (d).
 - (B) The source uses one (1) or more of the following emission reduction techniques:
 - (i) Resins or gel coats with HAP monomer contents lower than specified in subsection (b).
 - (ii) Vapor suppressed resins.
 - (iii) Vacuum bagging or other similar technique. This item does not include resin transfer molding or compression molding.
 - (iv) Air pollution control equipment where the emissions are estimated based on parametric measurements or stack monitoring.
 - (v) Controlled spray used in combination with automated actuators or robots.
 - (vi) Controlled spray that includes the following:
 - (AA) Mold flanges.
 - (BB) Spray technique.
 - (CC) Spray gun pressure.
 - (DD) Means of verifying continuous use of the controlled spray technique, such as mass balance of materials and

products (surface area and thickness of product) as approved by the commissioner prior to implementation.

(vii) Emission reduction techniques approved under subdivision (1).

(g) The following work practice standards shall be implemented:

- (1) For gel coats to be applied using non-atomized spray, spray equipment shall not be operated at pressures that atomize the material during the application process.
- (2) Except for mixing containers as described in item (7), HAP containing materials shall be kept in a closed container when not in use.
- (3) Solvents sprayed during cleanup and resin changes shall be directed into solvent collection containers.
- (4) Solvent collection containers shall be kept closed when not in use.
- (5) Clean-up rags with solvent shall be stored in closed containers.
- (6) Closed containers shall be used for the storage of the following:
 - (A) All production and tooling resins that contain HAPs.
 - (B) All production and tooling gel coats that contain HAPs.
 - (C) Waste resins and gel coats that contain HAPs.
 - (D) Cleaning materials, including waste cleaning materials.
 - (E) Other materials that contain HAPs.
- (7) All resin and gel coat mixing containers with a capacity equal to or greater than fifty-five (55) gallons must have a cover with no visible gaps in place at all times except when material is being added to or removed from a container, or when mixing or pumping equipment is being placed in or removed from a container.

(h) All new and existing personnel, including contract personnel, who are involved in resin and gel coat spraying and spray-like applications (for example, those applications that could result in excess emissions if performed improperly) shall be trained according to the following schedule:

- (1) All personnel shall be trained within fifteen (15) 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 an owner or operator subject to 326 IAC 20-25 are exempt from subdivision (1) if written documentation that the employee's training is current is provided to the new employer.
- (4) If the result of an evaluation shows that training is needed, such training shall occur within fifteen (15) days of the evaluation.

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

- (A) Appropriate application techniques.
 - (B) Appropriate equipment cleaning procedures.
 - (C) Appropriate equipment setup and adjustment to minimize material usage and overspray.
- (5) The owner or operator shall maintain the following training records on site and available for inspection and review:
- (A) A copy of the current training program.
 - (B) A list of all current personnel, by name, that are required to be trained and the dates they were trained and the date of the most recent refresher training. Records of prior training programs and former personnel are not required to be maintained.

D.1.2 Prevention of Significant Deterioration [326 IAC 2-2] [40 CFR 52.21]

- (a) The total source potential to emit for all criteria pollutants is less than 250 tons per year. Therefore the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.
- (b) Any change or modification which may increase potential to emit to 250 tons per year, from the equipment covered in this permit, shall require prior approval from IDEM, OAQ before such change may occur.

D.1.3 Particulate Matter (PM) [326 IAC 6-3-2(c)]

- (a) The particulate matter (PM) from the spray booth, identified as EU#1, shall be limited by the following:

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:

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

- (b) The allowable PM emission rate from the grinding booth, identified as EU#2, shall not exceed 2.67 pounds per hour when operating at a process weight rate of 1057 pounds per hour. The pounds per hour limitation was calculated with the following equation:

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.1.4 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 EU#1 and EU#2 and their control devices.

Compliance Determination Requirements

D.1.5 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC and PM limits specified in Conditions D.1.1 and D.1.3 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.6 Hazardous Air Pollutants (HAP) and Volatile Organic Compounds (VOC)

Compliance with the HAP and VOC content and usage limitations contained in Condition D.1.1 shall be determined using any of the following test methods, as applicable:

- (a) 40 CFR 60, Method 24, Appendix A, shall be used to measure the total volatile HAP and VOC content of resins and gel coats. Method 24 may be modified for measuring the volatile HAP content of resins or gel coats to require that the procedure be performed on uncatalyzed resin or gel coat samples.
- (b) 40 CFR 63, Method 311, Appendix A, shall be used to measure HAP content in resins and gel coats by direct injection into a gas chromatograph.
- (c) An alternate method approved by IDEM, OAQ.

D.1.7 VOC Emissions

Compliance with Condition D.1.1 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

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

D.1.8 Particulate Matter (PM)

Pursuant to CP No. 043-3669-00024, issued on April 29, 1996, the dry filters and Eurovac system shall be in operation at all times when EU#1 and EU#2, respectively, are in operation.

D.1.9 Monitoring

- (a) The spray booth, EU#1 and grinding booth EU#2 have applicable compliance monitoring conditions as specified below:
 - (1) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters in the spray booth and the Eurovac system. To monitor the performance of the dry filters, weekly observations shall be made of the particulate collection in the spray booth and the grinding booth while each booth is in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
 - (2) Monthly inspections shall be performed of the particulate emissions from each stack and any evidence of particulate deposition on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C -

Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

- (3) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

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

D.1.10 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAP emission limits established in Condition D.1.1.
 - (1) The usage by weight and VOC content of each resin, gel coat, catalyst, and solvent. Records shall include purchase orders, invoices, material safety data sheets (MSDS), waste manifests, and calculations, necessary to verify the type and amount used;
 - (2) A log of the dates of use;
 - (3) Method of application and other emission reduction techniques for each resin and gel coat used;
 - (4) The calculated total VOC emissions from resin, gel coat, catalyst and solvent use for each month.
 - (5) Monthly calculations demonstrating compliance on an equivalent emissions mass basis if non-compliant resins or gel coats are used during that month.
- (b) To document compliance with Condition D.1.1(h), the Permittee shall maintain the following training records:
 - (1) A copy of the current training program.
 - (2) A list of all current personnel, by name, that are required to be trained and the dates they were trained and the date of the most recent refresher training. Records of prior training programs and former personnel are not required to be maintained.
- (c) To document compliance with Conditions D.1.7 and D.1.8, the Permittee shall maintain a log of weekly particulate collection observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.11 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
Office of Air Quality**

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Cameo Marble
Source Address: 540 Central Court, New Albany, Indiana 47150
Mailing Address: 540 Central Court, New Albany, Indiana 47150
Part 70 Permit No.: T043-7086-00024

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:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 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:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

**Office of Air Quality
COMPLIANCE DATA SECTION
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

**PART 70 OPERATING PERMIT
EMERGENCY/DEVIATION OCCURRENCE REPORT**

Source Name: Cameo Marble
Source Address: 540 Central Court, New Albany, Indiana 47150
Mailing Address: 540 Central Court, New Albany, Indiana 47150
Part 70 Permit No.: T043-7086-00024

This form consists of 2 pages

Page 1 of 2

Check either No. 1 or No.2	
9	1. This is an emergency as defined in 326 IAC 2-7-1(12) c The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and c The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
9	2. This is a deviation, reportable per 326 IAC 2-7-5(3)(C) c The Permittee must submit notice in writing within ten (10) calendar days

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/Deviation:
Describe the cause of the Emergency/Deviation:

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

Page 2 of 2

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
Office of Air Quality
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Cameo Marble
Source Address: 540 Central Court, New Albany, Indiana 47150
Mailing Address: 540 Central Court, New Albany, Indiana 47150
Part 70 Permit No.: T043-7086-00024
Facility: spray booth (EU#1), pour department (EU#3), mold repair (EU#4), and clean-up solvent use
Parameter: VOCs
Limit: less than 50 tons per twelve (12) consecutive month period

YEAR: _____

Month	VOC Usage/Emissions (tons/month)	VOC Usage/Emissions Previous 11 Months (tons)	VOC Usage/Emissions 12 Month Total (tons)
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: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
Office of Air Quality
COMPLIANCE DATA SECTION

PART 70 OPERATING PERMIT
QUARTERLY COMPLIANCE MONITORING REPORT

Source Name: Cameo Marble
Source Address: 540 Central Court, New Albany, Indiana 47150
Mailing Address: 540 Central Court, New Albany, Indiana 47150
Part 70 Permit No.: T043-7086-00024

Months: _____ to _____ Year: _____

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

Compliance Monitoring Requirement (e.g. Permit Condition D.1.3)	Number of Deviations	Date of each Deviation

Form Completed By: _____
Title/Position: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

April 19, 2002

Indiana Department of Environmental Management Office of Air Quality

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

Source Background and Description

Source Name:	Cameo Marble
Source Location:	540 Central Court, New Albany, Indiana 47150
County:	Floyd
SIC Code:	3088
Operation Permit No.:	T 043-7086-00024
Operation Permit Issuance Date:	September 8, 2000
Significant Source Modification No.:	043-14973-00024
Significant Permit Modification No.:	043-14938-00024
Permit Reviewer:	ERG/MH

The Office of Air Quality (OAQ) has reviewed a modification application from Cameo Marble relating to the operation of the following emission units and pollution control devices:

- (a) One (1) spray booth for spraying gel coat onto fiberglass molds, identified as EU#1, utilizing one (1) spray gun capable of operating in either non-atomized or HVLP mode, with a maximum capacity of 1171 pounds per hour of units coated, with dry filters for particulate matter overspray control, exhausting to two (2) stacks, identified as S-1 and S-2. (Constructed in 1986)
- (b) One (1) grinding booth, identified as EU#2, with a maximum capacity of 1057 pounds per hour, with one (1) Eurovac system used for particulate matter control, exhausting internally. (Constructed in 1986)
- (c) One (1) Pour Department (marble casting operation), identified as EU#3, with a maximum capacity of 1171 pounds per hour of units coated, consisting of one (1) Respecta mixing machine, with a maximum matrix output of 3000 pounds per hour, exhausting to one (1) stack, identified as S-4. (Constructed in 1986)
- (d) One (1) mold maintenance repair operation, identified as EU#4, exhausting to one (1) stack identified as S-5. (Constructed in 1986)

History

On September 18, 2001, Cameo Marble submitted an application to the OAQ requesting an increase in the annual VOC limit from 25 to 50 tons. Cameo Marble was issued a Part 70 permit on September 8, 2000. This modification involves no new construction or modification of existing equipment.

Enforcement Issue

There are no enforcement actions pending.

Insignificant Activities

The source also consists of the following insignificant activity, as defined in 326 IAC 2-7-1(21):

- (a) One (1) mold maintenance set-up and gun cleaning operation, identified as EU#5, with a maximum acetone usage of 3.6 pounds per hour, exhausting to one (1) stack, identified as S-6. (Constructed in 1986)

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
S-1	Spray Booth EU#1	24.25	2.83	16,800	ambient
S-2	Spray Booth EU#2	24.25	2.83	16,800	ambient
S-4	Pour Department EU#3	--	--	indoor ventilation	ambient
S-5	Mold Repair EU#4	--	--	indoor ventilation	ambient

Recommendation

The staff recommends to the Commissioner that the Part 70 Significant Source Modification and Significant Permit Modification be approved. This recommendation is based on the following facts and conditions:

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 September 18, 2001. Additional information was received on October 29, 2001 and November 19, 2001.

Emission Calculations

See page 1 of Appendix A of this document for detailed emissions calculations.

Potential To Emit of Modification

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source 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."

This table reflects the PTE before controls for the modification (the additional capacity allowable under proposed limit beyond the potential to emit at the existing limit). Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	1.36
PM-10	1.36
SO ₂	--
VOC	25.0
CO	--
NO _x	--

HAP's	Potential To Emit (tons/year)
styrene	18.18
methyl ethyl ketone (MEK)	1.70
toulene	0.43
TOTAL	20.31

Justification for Modification

The Part 70 Operating permit is being modified through a Part 70 Significant Source Modification. Pursuant to 326 IAC 2-7-10.5(f)(2), this modification is significant because it raises the source's potential to emit VOCs above 25 tons per year and is therefore subject to 326 IAC 8-1-6 and the use of Best Available Control Technology (BACT). This modification is also significant pursuant to 326 IAC 2-7-10.5(f)(6) because it increases the source's potential to emit styrene, a HAP, by more than 10 tons per year. The permit modification for approval to operate is being performed pursuant to 326 IAC 2-7-12(d).

County Attainment Status

The source is located in Floyd County.

Pollutant	Status
PM-10	attainment
SO ₂	attainment
NO _x	attainment
Ozone	maintenance attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Floyd County has been designated as attainment for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Fugitive Emissions
 Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive PM emissions are not counted toward determination of PSD and Emission Offset applicability.

Source Status

Existing Source PSD or Emission Offset Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions* (tons/year)
PM	1.36
PM-10	1.36
SO ₂	--
VOC	25.0
CO	--
NOx	--

* The emissions of the existing source are the same as the modification because the modification is the doubling of the VOC emission limit.

- (a) This existing source is not a major stationary source pursuant to 326 IAC 2-2 (PSD) because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the 28 listed source categories.
- (b) These emissions are based on application submitted September 18, 2001 including Material Safety Data Sheets.

Potential to Emit of Modification After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the modification to the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 source modification.

Process/facility	Potential to Emit (tons/year)						
	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Synthetic marble casting process (EU#1, EU#2, EU#3, and EU#4)	1.36	1.36	--	25	--	--	20.31
PSD Significant Levels	250	250	250	250	250	250	--

- (a) This modification to an existing minor stationary source is not major because the emission increase is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2 and 40 CFR 52.21, the PSD requirements do not apply.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this proposed modification.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) 326 IAC 14 and 40 CFR Part 63) applicable to the proposed modification.

State Rule Applicability - Entire Source

326 IAC 2-4.1 Major Sources of Hazardous Air Pollutants

- (a) This source will emit levels of air toxics greater than those that constitute major source applicability according to Section 112 of the 1990 Clean Air Act Amendments.
- (b) The emitting units were constructed prior to the July 27, 1997 applicability date of the rule.
- (c) This modification is not construction or reconstruction. Therefore, 326 IAC 2-4.1 (New Source Toxics Control) does not apply.

326 IAC 1-6-3 (Preventive Maintenance Plan)

The source has submitted a Preventive Maintenance Plan (PMP) on November 4, 1996. This PMP has been verified to fulfill the requirements of 326 IAC 1-6-3 (Preventive Maintenance Plan).

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it is located in Floyd County and has the potential to emit more than ten (10) tons per year of VOCs. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

State Rule Applicability - Individual Facilities

326 IAC 6-3-2 (Process Operations)

- (a) Particulate matter (PM) from spray booth EU#1 shall be limited by the following:

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:

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

The dry filters shall be in operation at all times the spray booth is in operation, in order to comply with this limit.

- (b) Particulate matter (PM) from grinding booth EU#2 shall not exceed 2.67 pounds per hour when operating at a process weight rate of 1057 pounds per hour. This limit was calculated with the following equation:

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

The Eurovac system shall be in operation at all times the grinding booth is in operation, in order to comply with this limit.

326 IAC 8-1-6 (Volatile Organic Compounds (VOC))

Because the potential to emit VOC exceeds 25 tons per year, and no other Article 8 rules apply, the synthetic marble products operation is subject to the requirements of 326 IAC 8-1-6, which requires the use of Best Available Control Technology (BACT).

As discussed in Appendix B of this document, BACT for these emission units shall be a VOC limit

of fifty (50) tons per year and compliance with the following requirements:

- (a) The total HAP monomer content of the following materials shall be limited depending on the application method and products produced as specified in the following tables:

	HAP Monomer Content, wt. %
Resin (filled \$35% by weight)	38
Clear gel coat, subject to ANSI ^a standards	50
Pigmented gel coat, subject to ANSI ^a standards	45
Clear gel coat, non-ANSI ^a	44
Pigmented gel coat, non-ANSI ^a	37
Tooling (mold repair)	45

^aAmerican National Standards Institute.

- (b) For the application of light-colored gel coat: Non-atomized spray or equivalent emission reduction technology approved by the commissioner.
- (c) For the application of dark-colored or clear gel coat: HVLP spray using the minimum amount of atomization necessary to meet product appearance standards or equivalent emission reduction technology approved by the commissioner.
- (d) Cleaning operations for resin and gel coat application equipment shall be as follows:
- (1) For routine flushing of resin and gel coat application equipment such as spray guns, flowcoaters, brushes, rollers, and squeegees, a cleaning solvent shall contain no HAPs. This standard does not apply to solvents used for removing cured resin or gel coat from application equipment.
 - (2) A source must store HAP containing solvents used for removing cured resin or gel coat in containers with covers. The covers must have no visible gaps and must be in place at all times, except when equipment is placed in or removed from the container.
 - (3) Recycled cleaning solvents that contain less than or equal to five percent (5%) HAP by weight are considered to contain no HAP for the purposes of this subsection.
- (e) The source may comply with this section using monthly emission averaging within each resin or gel coat application category listed in subsection (d) without prior approval by the commissioner.

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

For averaging within a category:

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

Where:

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

- (f) Upon written application by the source, the commissioner may approve the following:
- (1) Enforceable alternative emission reduction techniques that are at least equally protective of the environment as the emission standards in subsections (a) through (e).
 - (2) Use of monthly emissions averaging for any or all material or application categories listed in subsection (a) if the following conditions are met:
 - (A) The source shows that emissions did not exceed the emissions that would have occurred if each emission unit had met the requirements of subsections (a) through (e).
 - (B) The source uses one or more of the following emission reduction techniques:
 - (C) Resins or gel coats with HAP monomer contents lower than specified in subsection (a).
 - (D) Vapor suppressed resins.
 - (E) Vacuum bagging or other similar technique. This item does not include resin transfer molding or compression molding.
 - (F) Air pollution control equipment where the emissions are estimated based on parametric measurements or stack monitoring.
 - (G) Controlled spray used in combination with automated actuators or robots.
 - (H) Controlled spray that includes the following:
 - (i) Mold flanges.
 - (ii) Spray technique.
 - (iii) Spray gun pressure.
 - (iv) Means of verifying continuous use of the controlled spray technique, such as mass balance of materials and products (surface area and thickness of product) as approved by the commissioner prior to implementation.
 - (I) Emission reduction techniques approved under subdivision (1).
- (g) The following work practice standards shall be implemented:
- (1) For gel coats to be applied using non-atomized spray, spray equipment shall not be operated at pressures that atomize the material during the application process.

- (2) Except for mixing containers as described in item (6), HAP containing materials shall be kept in a closed container when not in use.
- (3) Solvents sprayed during cleanup and resin changes shall be directed into solvent collection containers.
- (4) Solvent collection containers shall be kept closed when not in use.
- (5) Clean-up rags with solvent shall be stored in closed containers.
- (6) Closed containers shall be used for the storage of the following:
 - (A) All production and tooling resins that contain HAPs.
 - (B) All production and tooling gel coats that contain HAPs.
 - (C) Waste resins and gel coats that contain HAPs.
 - (D) Cleaning materials, including waste cleaning materials.
 - (E) Other materials that contain HAPs.
- (7) All resin and gel coat mixing containers with a capacity equal to or greater than fifty-five (55) gallons must have a cover with no visible gaps in place at all times except when material is being added to or removed from a container, or when mixing or pumping equipment is being placed in or removed from a container.
- (h) All new and existing personnel, including contract personnel, who are involved in resin and gel coat spraying and spray-like applications (for example, those applications that could result in excess emissions if performed improperly) shall be trained according to the following schedule:
 - (1) All personnel shall be trained within fifteen (15) days of hiring.
 - (2) All personnel shall be given refresher training annually.
 - (3) Personnel who have been trained by an owner or operator subject to 326 IAC 20-25 are exempt from subdivision (1) if written documentation that the employee's training is current is provided to the new employer.
 - (4) If the result of an evaluation shows that training is needed, such training shall occur within fifteen (15) days of the evaluation.

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.

The owner or operator shall maintain the following training records on site and available

for inspection and review:

- (1) A copy of the current training program.
- (2) A list of all current personnel, by name, that are required to be trained and the dates they were trained and the date of the most recent refresher training. Records of prior training programs and former personnel are not required to be maintained.

326 IAC 20-25 (Emissions from Reinforced Plastics Composites Fabricating Emission Units)
Marble casting is not subject to 326 IAC 20-25 because the plastic is not fiber reinforced.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less 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 requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also 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.

The compliance monitoring requirements applicable to spray booth EU#1 and grinding booth EU#2 are as follows:

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters in the spray booth and the Eurovac system. Weekly observations shall be made of particulate collector in the spray booth and grinding booth while each booth is in operation.

The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

- (b) Monthly inspections shall be performed of the particulate emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan -Preparation,

Implementation, Records, and Reports, shall be considered a violation of this permit.

- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary because the dry filters on the spray booth and the Eurovac system for the grinding booth shall be in operation at all times each booth is in operation to ensure compliance with 326 IAC 6-3-2(c).

Proposed Changes

Proposed changes to the permit have been indicated using the bold (additions) and strikethrough (deletions) method. The changes indicated for Sections B and C are a result of recent rule changes, as well as discussions between IDEM and EPA on the standard permitting language contained in all Title V permits.

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:

- (a) One (1) spray booth for spraying gel coat onto fiberglass molds, identified as EU#1, utilizing **one (1) air-atomized spray guns capable of operating in either non-atomized or HVLP mode**, with a maximum capacity of 1171 pounds per hour of units coated, with dry filters for particulate matter overspray control, exhausting to two (2) stacks, identified as S-1 and S-2. (Constructed in 1986)

B.3 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the **effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.** ~~original date, 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.**

B.13 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; ~~except as provided in 326 IAC 2-7-16.~~

- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a ~~health-based or~~ 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:

- (g) ~~Operations may continue during an emergency only if the following conditions are met:~~

~~(1) 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.~~

~~(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:~~

~~(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and~~

~~(B) Continued operation of the facilities is 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.~~

~~Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.~~

B.14 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] {326 IAC 2-7-12}

- (a) ~~This condition provides a permit shield as addressed in 326 IAC 2-7-15. 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 in 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) ~~This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:~~
- (1) ~~The applicable requirements are included and specifically identified in this permit;~~
~~or~~
- (2) ~~The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.~~

B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]

~~Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.~~

B.15 Prior Permit Conditions Superseded [326 IAC 2-1.1-9.5]

- (a) **All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either**
- (1) **incorporated as originally stated,**
- (2) **revised, or**
- (3) **deleted**

by this permit.

(b) All previous registrations and permits are superseded by this permit.

B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance ~~Branch~~ **Data Section** , Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

~~within ten (10) calendar days from the date of the discovery of the deviation:~~

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. 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.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit. ~~or a rule. It does not include:~~

~~(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or~~

~~(2) An emergency as defined in 326 IAC 2-7-1(12); or~~

~~(3) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.~~

~~(4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.~~

~~A Permittee’s failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.~~

(c) ~~Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the “responsible official” as defined by 326 IAC 2-7-1(34).~~ **Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.**

~~(d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection~~

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140 ,Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least

thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(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
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

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 by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (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 14-10-4, 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) **Indiana Accredited 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 Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited, **pursuant to the provisions of 40 CFR 61, Subpart M**, is federally enforceable.

C.14 **Compliance Monitoring Response Plan - Failure to Take Response Steps Preparation,**

Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) The Permittee is required to **prepare** ~~implement~~ a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. ~~The compliance monitoring plan is comprised of:~~
- ~~(1) This condition;~~
 - ~~(2) The Compliance Determination Requirements in Section D of this permit;~~
 - ~~(3) The Compliance Monitoring Requirements in Section D of this permit;~~
 - ~~(4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and~~
 - ~~(5) A~~ **a** Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. **A CRP's** shall be submitted to IDEM, OAQ upon request ~~and shall be subject to review and approval by IDEM, OAQ;~~ The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, **supplemented from time to time by the Permittee,** and maintained on site, and ~~is~~ comprised of:
 - ~~(A)~~ **(1) Reasonable R** response steps that ~~will~~ **may** be implemented in the event that compliance-related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and **an expected time frame for taking reasonable response steps.**
 - ~~(B) A time schedule for taking reasonable response steps including a schedule for devising additional response steps for situations that may not have been predicted.~~
- (b) For each compliance monitoring condition of this permit, appropriate **reasonable** response steps shall be taken when indicated by the provisions of that compliance monitoring condition **as follows:** ~~Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.~~
- (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or**
 - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.**

- (1) **If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.**
 - (2) **Failure to take reasonable response steps shall constitute a violation of the permit.**
- (c) ~~After investigating the reason for the excursion, the~~ **The Permittee is excused from taking not required to take any** further response steps for any of the following reasons:
- (1) ~~The monitoring equipment malfunctioned, giving a~~ **A false reading occurs due to the malfunction of the monitoring equipment and** ~~This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.~~
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for ~~an administrative amendment~~ **a minor permit modification to the permit**, and such request has not been denied. ~~or;~~
 - (3) An automatic measurement was taken when the process was not operating. ~~or~~
 - (4) The process has already returned **or is returning** to operating within "normal" parameters and no response steps are required.
- (d) ~~Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.~~ **When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.**
- (e) **The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.**
- (f) **Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.**

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
[326 IAC 2-7-6]

-
- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these **corrective response** actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the **corrective response** actions are being

~~implemented. IDEM, OAQ shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAQ within thirty (30) days of receipt of the notice of deficiency. IDEM, OAQ reserves the authority to use enforcement activities to resolve noncompliant stack tests.~~

- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline. ~~Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.~~
- (c) **IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.**

The documents submitted pursuant to this condition do ~~not~~ require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

- (c) Support information shall include, where applicable:
 - (4) Records of preventive maintenance shall be sufficient to demonstrate that failure to implement the Preventive Maintenance Plan did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Response Monitoring Plan - ~~Failure to take Response Steps~~, **Preparation, Implementation, Records, and Reports**, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

- (a) One (1) spray booth for spraying gel coat onto fiberglass molds, identified as EU#1, utilizing **one (1) air-atomized spray guns capable of operating in either non-atomized or HVLP mode**, with a maximum capacity of 1171 pounds per hour of units coated, with dry filters for particulate matter overspray control, exhausting to two (2) stacks, identified as S-1 and S-2. (Constructed in 1986)
- (b) One (1) grinding booth, identified as EU#2, with a maximum capacity of 1057 pounds per hour, with one (1) Eurovac system used for particulate matter control, exhausting internally. (Constructed in 1986)
- (c) One (1) Pour Department, identified as EU#3, with a maximum capacity of 1171 pounds per hour of units coated, consisting of one (1) Respecta mixing machine, with a maximum matrix output of 3000 pounds per hour, exhausting to one (1) stack, identified as S-4. (Constructed in 1986)
- (d) One (1) mold maintenance repair operation, identified as EU#4, exhausting to one (1) stack identified as S-5. (Constructed in 1986)

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

D.1.1 General Reduction Requirements for New Facilities [326 IAC 8-1-6]

The ~~potential to emit (PTE) VOC from the spray booth, identified as EU#1, the pour department, identified as EU#3, and mold repair operation, identified as EU#4, including all cleanup-solvent usage, shall be limited to less than 25 tons per twelve (12) consecutive month period, making are subject to the requirements of 326 IAC 8-1-6 not applicable which requires that the Best Available Control Technology (BACT) be used to control VOC emissions. BACT for these emission units shall be a limitation on the potential to emit VOCs of fifty (50) tons per twelve (12) consecutive month period and compliance with the following requirements:~~

~~(a) Compliance with the VOC limit. This limit shall be determined as follows: based on the following criteria:~~

~~(a)(1)~~ **(1)(A)** VOC emissions from gel coat application in the spray booth (EU#1) **and mold repair (EU#4)** shall be determined by multiplying the usage by weight of each gel coat by the emission factor that is appropriate for the styrene and/or methyl methacrylate monomer content for each gel coat, and summing the emissions for all gel coats.

~~(1)(A)~~ **(1)(A)** Emission factors shall be obtained from the following reference approved by IDEM, OAQ: "Unified Emission Factors for Open Molding of Composites: Gelcoat Application (styrene and methyl methacrylate content in gelcoat)," Composites Fabricators Association, **July 2001 addendum. April 20, 1999, with the exception of the emission factors for controlled spray application.** This reference is included with this permit.

~~(2)(B)~~ **(2)(B)** For the purposes of these emission calculations, organic monomer in gel coats that is not styrene or methyl methacrylate shall be considered as styrene on an equivalent weight basis.

~~(b)(2)~~ **(2)(B)** ~~VOC~~ **Monomer** emissions from the marble casting operation in the Pour Department (EU#3) shall be determined by multiplying the usage by weight of each resin by the ~~styrene~~ **monomer content** of the resin and by the appropriate emission factor, and summing the emissions for all resins.

The emission factors for the marble casting operation shall be ~~taken from the following~~

reference approved by IDEM, OAQ: AP-42, Fifth Edition, Section 4.4, "Polyester Resin Plastics Product Fabrication: Marble Casting," U.S. EPA, January 1995, and shall not exceed 3.0% styrene emitted per weight of styrene monomer contained in the resin applied.

- (e)(3) **MEK emissions from the marble casting operation in the Pour Department (EU#3) shall be determined by multiplying the usage by weight of the catalyst by the MEK content of the catalyst.**
- (e)(4) **Cleanup solvent emissions shall be calculated by subtracting VOC contained in the clean-up waste from the amount of solvent applied.**
- (e)(5) **Total VOC emissions shall be calculated as the sum of emissions from EU#1, and EU#3, EU#4 and clean-up solvents. .**

(b) The total HAP monomer content of the following materials shall be limited depending on the application method and products produced as specified in the following tables:

	HAP Monomer Content, wt. %
Resin (filled 35% by weight)	38
Clear gel coat, subject to ANSI^a standards	50
Pigmented gel coat, subject to ANSI^a standards	45
Clear gel coat, non-ANSI^a	44
Pigmented gel coat, non-ANSI^a	37
Tooling (mold repair)	45

^aAmerican National Standards Institute.

- (c) **Gel coat application shall be by the following spray technologies:**
 - (1) **For light-colored gel coat: Nonatomized spray or an equivalent emission reduction technology approved by the commissioner.**
 - (2) **For dark-colored or clear gel coat: HVLP using the minimum amount of atomization necessary to meet product appearance standards specifications or an equivalent emission reduction technology approved by the commissioner.**
- (d) **Cleaning operations for resin and gel coat application equipment shall be as follows:**
 - (1) **For routine flushing of resin and gel coat application equipment such as spray guns, flowcoaters, brushes, rollers, and squeegees, a cleaning solvent shall contain no HAPs. This standard does not apply to solvents used for removing cured resin or gel coat from application equipment.**
 - (2) **A source must store HAP containing solvents used for removing cured resin or gel coat in containers with covers. The covers must have no visible gaps and must be in place at all times, except when equipment is placed in or removed from the container.**

- (3) **Recycled cleaning solvents that contain less than or equal to five percent (5%) HAP by weight are considered to contain no HAP for the purposes of this subsection.**
- (e) **The owner or operator of a source subject to this rule may comply with this section using monthly emission averaging within each resin or gel coat application category listed in subsection D.1.2(a) without prior approval by the commissioner.**

For averaging within a category:

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

Where:

M_R = Total monthly mass of material within each category

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

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

- (f) **Upon written application by the source, the commissioner may approve the following:**
- (1) **Enforceable alternative emission reduction techniques that are at least equally protective of the environment as the emission standards in subsections (b) through (d).**
- (2) **Use of monthly emissions averaging for any or all material or application categories listed in subsection (b) if the following conditions are met:**
- (A) **The source shows that emissions did not exceed the emissions that would have occurred if each emission unit had met the requirements of subsections (b) through (d).**
- (B) **The source uses one or more of the following emission reduction techniques:**
- (i) **Resins or gel coats with HAP monomer contents lower than specified in subsection (b).**
- (ii) **Vapor suppressed resins.**
- (iii) **Vacuum bagging or other similar technique. This item does not include resin transfer molding or compression molding.**
- (iv) **Air pollution control equipment where the emissions are estimated based on parametric measurements or stack monitoring.**
- (v) **Controlled spray used in combination with automated actuators or robots.**
- (vi) **Controlled spray that includes the following:**

- (AA) Mold flanges.**
- (BB) Spray technique.**
- (CC) Spray gun pressure.**
- (DD) Means of verifying continuous use of the controlled spray technique, such as mass balance of materials and products (surface area and thickness of product) as approved by the commissioner prior to implementation.**

- (vii) Emission reduction techniques approved under subdivision (1).**

(g) The following work practice standards shall be implemented:

- (1) For gel coats to be applied using non-atomized spray, spray equipment shall not be operated at pressures that atomize the material during the application process.**
- (2) Except for mixing containers as described in item (7), HAP containing materials shall be kept in a closed container when not in use.**
- (3) Solvents sprayed during cleanup and resin changes shall be directed into solvent collection containers.**
- (4) Solvent collection containers shall be kept closed when not in use.**
- (5) Clean-up rags with solvent shall be stored in closed containers.**
- (6) Closed containers shall be used for the storage of the following:**
 - (A) All production and tooling resins that contain HAPs.**
 - (B) All production and tooling gel coats that contain HAPs.**
 - (C) Waste resins and gel coats that contain HAPs.**
 - (D) Cleaning materials, including waste cleaning materials.**
 - (E) Other materials that contain HAPs.**
- (7) All resin and gel coat mixing containers with a capacity equal to or greater than fifty-five (55) gallons must have a cover with no visible gaps in place at all times except when material is being added to or removed from a container, or when mixing or pumping equipment is being placed in or removed from a container.**

(h) All new and existing personnel, including contract personnel, who are involved in resin and gel coat spraying and spray-like applications (for example, those applications that could result in excess emissions if performed improperly) shall be trained according to the following schedule:

- (1) All personnel shall be trained within fifteen (15) 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 an owner or operator subject to 326 IAC 20-25 are exempt from subdivision (1) if written documentation that the employee's training is current is provided to the new employer.**
- (4) If the result of an evaluation shows that training is needed, such training shall occur within fifteen (15) days of the evaluation.**

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

- (A) Appropriate application techniques.**
 - (B) Appropriate equipment cleaning procedures.**
 - (C) Appropriate equipment setup and adjustment to minimize material usage and overspray.**
- (5) The owner or operator shall maintain the following training records on site and available for inspection and review:**
 - (A) A copy of the current training program.**
 - (B) A list of all current personnel, by name, that are required to be trained and the dates they were trained and the date of the most recent refresher training. Records of prior training programs and former personnel are not required to be maintained.**

D.1.2 Prevention of Significant Deterioration [326 IAC 2-2] [40 CFR 52.21] and Emission Offset [326 IAC 2-3]

- ~~(a) The total source potential to emit for VOCs and NOx is less than 100 tons per year. Therefore the requirements of 326 IAC 2-3 (Emissions Offset) will not apply.~~
- (a)(b) The total source potential to emit for all other criteria pollutants is less than 250 tons per year. Therefore the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.**
- (b)(e) Any change or modification which may increase potential to emit to 250 tons per year, from the equipment covered in this permit, shall require prior approval from IDEM, OAQ before such change may occur.**

D.1.3 Particulate Matter (PM) [326 IAC 6-3-2(c)]

- (a) The particulate matter (PM) from the spray booth, identified as EU#1, shall be limited by the following:**

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:

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

- (b) The allowable PM emission rate from the grinding booth, identified as EU#2, shall not exceed 2.67 pounds per hour when operating at a process weight rate of 1057 pounds per**

hour. The pounds per hour limitation was calculated with the following equation:

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.1.4 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 EU#1 and EU#2 and **their control devices.** ~~the dry filters and baghouse, respectively.~~

Compliance Determination Requirements

D.1.5 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC and PM limits specified in Conditions D.1.1 and D.1.3 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.6 Hazardous Air Pollutants (HAP) and Volatile Organic Compounds (VOC)

Compliance with the **HAP and VOC** content and usage limitations 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)~~ using **any of the following test methods, as applicable:**

- (a) **40 CFR 60, Method 24, Appendix A, shall be used to measure the total volatile HAP and VOC content of resins and gel coats. Method 24 may be modified for measuring the volatile HAP content of resins or gel coats to require that the procedure be performed on uncatalyzed resin or gel coat samples.**
- (b) **40 CFR 63, Method 311, Appendix A, shall be used to measure HAP content in resins and gel coats by direct injection into a gas chromatograph.**
- (c) **An alternate method approved by IDEM, OAQ.**

~~formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.~~

D.1.7 VOC Emissions

Compliance with Condition D.1.1 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

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

D.1.8 Particulate Matter (PM)

Pursuant to CP No. 043-3669-00024, issued on April 29, 1996, the dry filters and **Eurovac system** ~~baghouse~~ for PM control shall be in operation at all times when EU#1 and EU#2, respectively, are in operation.

D.1.9 Monitoring

-
- (a) The spray booth, ~~identified as EU#1~~ **has and grinding booth EU#2 have** applicable compliance monitoring conditions as specified below:
- (1) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters **in the spray booth and the Eurovac system**. To monitor the performance of the dry filters, weekly observations shall be made of the **particulate collection in the spray booth and the grinding booth while each booth is overspray from the surface coating booth stacks (S-1 and S-2) while one or more of the booths are** in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance **Response Monitoring Plan - Failure to Take Response Steps Preparation, Implementation, Records, and Reports**, shall be considered a violation of this permit.
 - (2) Monthly inspections shall be performed of the **particulate emissions** ~~coating emissions from the each~~ stack and **any evidence of particulate deposition the presence of overspray** on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance **Response Monitoring Plan - Failure to Take Response Steps Preparation, Implementation, Records, and Reports**, shall be considered a violation of this permit.
 - (3) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

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

D.1.10 Record Keeping Requirements

- (a) To document compliance with Conditions **D.1.1 and D.1.2**, the Permittee shall maintain records in accordance with (1) through ~~(45)~~ below. Records maintained for (1) through ~~(45)~~ shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC **and HAP** emission limits established in Condition D.1.1.
- (1) The usage by weight and **VOC monomer** content of each resin, ~~and gel coat, catalyst, and solvent~~. Records shall include purchase orders, invoices, ~~and~~ material safety data sheets (MSDS), **waste manifests, and calculations**, necessary to verify the type and amount used;
 - (2) A log of the dates of use;
 - (3) Method of application and other emission reduction techniques for each resin and gel coat used;
 - (4) The calculated total VOC emissions from resin, ~~and gel coat, catalyst and solvent~~ use for each month.

- (5) **Monthly calculations demonstrating compliance on an equivalent emissions mass basis if non-compliant resins or gel coats are used during that month.**
- (b) **To document compliance with Condition D.1.1(h), the Permittee shall maintain the following training records:**

 - (1) **A copy of the current training program.**
 - (2) **A list of all current personnel, by name, that are required to be trained and the dates they were trained and the date of the most recent refresher training. Records of prior training programs and former personnel are not required to be maintained.**
- (c) To document compliance with Conditions D.1.8 and D.1.9, the Permittee shall maintain a log of weekly **particulate collection** ~~overspray~~ observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.11 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
Office of Air Quality
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Cameo Marble
Source Address: 540 Central Court, New Albany, Indiana 47150
Mailing Address: 540 Central Court, New Albany, Indiana 47150
Part 70 Permit No.: T043-7086-00024
Facility: spray booth (EU#1), and pour department (EU#3), **mold repair (EU#4), and all clean-up solvent use**
Parameter: VOCs
Limit: less than **2550** tons per twelve (12) consecutive month period

Conclusion

The construction of this proposed modification shall be subject to the conditions of the proposed Part 70 Significant Source Modification No. 043-14973-00024, and the operation of this proposed modification shall be subject to the conditions of the proposed Part 70 Significant Permit Modification No. 043-14938-00024.

Appendix A: Emissions Calculations**Gel Coating Operations and Closed Molding of Composite Matrix**Company Name: **Cameo Marble**Address City IN Zip: **540 Central Court, New Albany IN 47150**CP: **043-14973**Plt ID: **043-00024**Reviewer: **ERG/mh**Date: **12/07/2001****Limited Potential to Emit After Modification**

PTE of Modification Alone is 50% of These Totals

Gel Coat		Composite Matrix	
Gel Coat Usage	168 tons per year	Matrix Rate	1171 pounds per hour
Catalyst Content	2.0% *	Matrix Usage	5129 tons per year
		Catalyst Content	2.0% *
		Resin Content	20.0%

Material	Annual Usage (tons/year)	Weight % VOC	Weight % Methyl Ethyl Ketone	Weight % Styrene	Methyl Ethyl Ketone Emission Factor (%)	Styrene Emission Factor (%)	Potential Methyl Ethyl Ketone (tons/year)	Potential Styrene (tons/year)	Total Potential VOC (tons/year)
Clear Gel Coat	168	47.44%	0	47.44%	0	16.3%	0	27.44	27.44
Gel Coat Catalyst	3.4	2.40%	2.4%	0	100%	0	0.08	0	0.08
Matrix Resin	1026	29.00%	0	29.00%	0	3%	0	8.92	8.92
Matrix Catalyst	103	2.40%	2.4%	0	100%	0	2.46	0	2.46
<i>Cleanup Solvents</i>									
Superflush S-280	9.39	100%	0	0	0	0	0	0	9.39
Frekote Mold Cleaner****	1.70	100%	50%	0	100%	0	0.85	0	1.70

Potential to Emit 3.39 36.37 50.00

Potential to Emit based on highest HAP-emitting gel coat, 8760 hours of resin production, and maximum catalyst content.

Gel Coat Emission Factors are taken from: Haberlin, Robert A., Unified Emission Factors for Open Molding of Composites, Engineering Environmental Consulting Services Report, Engineering Environmental Consulting Services Report, July 17, 2001 Addendum. (Internet address: www.cfa-hq.org/uef_table_23jul01.pdf)

Closed Molding (matrix) emission factor from AP-42 Section 4.4, Table 4.4-2, 5th Edition (January 1995).

Styrene Emission Factor based on clear gel coat w/ non-atomized (HVLP) application = (0.4506 * %styrene) - 0.0505

Clear gel coat is normally applied in non-atomized mode, but because the spray guns have the capability of operating in atomized mode, this higher emission factor is used.

* The maximum catalyst content, 2%, is used only during cold weather. A 1% catalyst content is typical.

** Clear gel coat contains no methyl methacrylate.

*** Potential to Emit of Solvents estimated as double their 2001 actual usage

**** Frekote mold cleaner contains 50% MEK and 50% toluene.

Particulate Emissions

Material	Annual Usage (tons/year)	Weight % Volatile (H ₂ O & Organics)	Transfer Efficiency	Filter Efficiency	PM Potential (ton/yr)
EU#1 w/ Biscuit Gel Coat	168	35.62%	75%	90%	2.71

Potential to Emit 2.71

Methodology

HVLP Spray guns with controlled spray techniques.

Colored gel coat has the highest solids.

PM Potential Tons per Year = Amount of Resin Used per year (tons/yr) * (1- Weight % Volatiles) * (1-Transfer efficiency) * (1-Filter efficiency)

April 19, 2002

Appendix B

BEST AVAILABLE CONTROL TECHNOLOGY (BACT) DETERMINATION

Source Background and Description

Source Name:	Cameo Marble
Source Location:	540 Central Court, New Albany, Indiana 47150
County:	Floyd
SIC Code:	3088
Operation Permit No.:	T 043-7086-00024
Operation Permit Issuance Date:	September 8, 2000
Significant Source Modification No.:	043-14973-00024
Significant Permit Modification No.:	043-14938-00024
Permit Reviewer:	ERG/MH

BACT Analysis

The Indiana Department of Environmental Management (IDEM) has performed the following federal BACT review for the synthetic marble products manufacturing owned and operated by Cameo Marble, located in New Albany, Indiana. This review was performed based on a maximum rate of 230 tons of gel coat per year with an VOC emission limit of 50 tons per year. The synthetic marble products manufacturing consists of the following processes/equipment:

- (a) One (1) spray booth for spraying gel coat onto fiberglass molds, identified as EU#1, utilizing one (1) spray gun capable of operating in either non-atomized or HVLP mode, with a maximum capacity of 1171 pounds per hour of units coated, with dry filters for particulate matter overspray control, exhausting to two (2) stacks, identified as S-1 and S-2. (Constructed in 1986)
- (b) One (1) grinding booth, identified as EU#2, with a maximum capacity of 1057 pounds per hour, with one (1) Eurovac system used for particulate matter control, exhausting internally. (Constructed in 1986)
- (c) One (1) Pour Department (marble casting operation), identified as EU#3, with a maximum capacity of 1171 pounds per hour of units coated, consisting of one (1) Respecta mixing machine, with a maximum matrix output of 3000 pounds per hour, exhausting to one (1) stack, identified as S-4. (Constructed in 1986)
- (d) One (1) mold maintenance repair operation, identified as EU#4, exhausting to one (1) stack identified as S-5. (Constructed in 1986)

Pursuant to 326 IAC 8-1-6, sources whose potential to emit VOCs exceeds 25, shall use BACT. IDEM conducts BACT analyses in accordance with the "Top-Down" Best Available Control Technology Guidance Document outlined in the 1990 draft U.S EPA New Source Review Workshop Manual, which outlines the steps for conducting a top-down BACT analysis. Those steps are listed below:

- (a) Identify all potentially available control options;
- (b) Eliminate technically infeasible control options;

- (c) Rank remaining control technologies by control effectiveness;
- (d) Evaluate the most effective controls and document the results; and
- (e) Select BACT.

Also, in accordance with the "Top-Down" Best Available Control Technology Guidance Document outlined in the 1990 draft U.S EPA New Source Review Workshop Manual, BACT analyses take into account the energy, environmental, and economic impacts on the source. These reductions may be determined through the application of available control techniques, process design, and/or operational limitations. Such reductions are necessary to demonstrate that the emissions remaining after application of BACT will not cause or contribute to air pollution thereby protecting public health and the environment.

The following BACT determinations are based on the following information:

- (a) The BACT analysis by Cameo Marble dated October 19, 2001;
- (b) Information from vendors/suppliers;
- (c) The EPA RACT/BACT/LAER (RBLC) Clearinghouse.

VOC BACT

Most of the VOCs from this source are emitted by spraying gel coat onto open molds. The quantity emitted is determined by the level of monomer in the gel coat and the spray technology. The gel coat surface of all Cameo products are subject to the American National Standards Institute (ANSI) standards for long-term crack resistance and surface hardness.

The molds containing the hardened gel coat proceed to the pouring area where a resin matrix consisting of 79% calcium carbonate, 20% unsaturated polyester, and 1 to 2% catalyst, is added. Molds are removed after curing.

Step 1 - Identify Control Options

Control Options Evaluated - The following available technologies were evaluated to control VOC emissions from synthetic marble products manufacturing. IDEM searched EPA's RACT/BACT/LAER Clearinghouse (RBLC) and the source surveyed respective control technology vendors to identify sources with emissions similar to this source. The search identified the following:

SIC Code	Source Name	RBLC ID	Process	BACT
3089	Syntec Marble	CA-0696	synthetic marble casting	Clear gel coat monomer <47%. Pigmented gel coat monomer < 35%.
3088	Florestone Products	CA-0807	closed compression molding	Air-assisted airless spray, low VOC materials, non-VOC clean-up solvents.
3281	Custom Marble and Onyx	CA-0781	synthetic marble casting	Clear gel coat monomer < 47%. Resin monomer content < 34%.

SIC Code	Source Name	RBLC ID	Process	BACT
3089	Polymark Corp.	OH-0237	Bathtub and shower panel fiberglass mfg.	Thermal oxidizer with adsorber and total enclosure

Step 2 - Eliminate technically infeasible control options

Based on a vendor review and evaluation of the control technologies, IDEM determined that low monomer gel coats and non-atomized spray application of pigmented gel coats were technically infeasible for the following reasons.

- (a) Monomer levels close to 50% for clear gel coat or 45% for pigmented gel coat are needed to consistently meet ANSI standards. These levels 50% and 45% are the maximum category-average level allowable under 326 IAC 20-25. The monomer levels in the gel coats currently used by Cameo are 47.4% (clear) and 37.3% (pigmented). These levels are consistent with monomer levels in other BACT determinations for synthetic marble products manufacturing.
- (b) Non-atomized spray application of dark-colored and clear gel coats is infeasible because of product appearance standards.
- (c) Electrostatic application of gel coat is infeasible because the surfaces to be coated are plastic.

Step 3 - Rank remaining control technologies by control effectiveness

Remaining technically feasible approaches for controlling VOC emissions from facilities that have a VOC PTE comparable in magnitude to the synthetic marble products manufacturing at this source:

- (a) Thermal Oxidization, 99% efficient.
- (b) Non-atomized spray application of gel coat.
- (c) HVLP spray application.
- (d) Air-assisted airless spray application.

Step 4 - Evaluate the most effective controls and document results

The cost per ton of VOC removed per year for thermal oxidation was estimated to be \$13,391. This amount is significantly larger than the cost effectiveness for other sources of this type and for other BACT sources in general.

Of the gel coat spray technologies evaluated, non-atomized spray has the lowest emissions. For some gel coats, non-atomized spray results in off-quality products. For these gel coats, HVLP (i.e., atomized) spray with controlled spray technology is the best available technology. The degree of atomization created by the spray gun used at this source can be adjusted. Wherever possible, based on appearance standards, the degree of atomization shall be minimized.

Step 5 - Select BACT

Based on the considerations mentioned above, IDEM has determined that BACT for Cameo Marble's synthetic marble products operation to be a VOC limit of 50 tons per consecutive 12 month period and compliance with the following requirements:

- (a) The total HAP monomer content of the following materials shall be limited depending on the application method and products produced as specified in the following table:

	HAP Monomer Content, wt. %
Resin (filled \$35% by weight)	38
Clear gel coat, subject to ANSI ^a standards	50
Pigmented gel coat, subject to ANSI ^a standards	45
Clear gel coat, non-ANSI ^a	44
Pigmented gel coat, non-ANSI ^a	37
Tooling (mold repair)	45

^aAmerican National Standards Institute.

- (b) For the application of light-colored gel coat: Non-atomized spray.
- (c) For the application of dark-colored or clear gel coat: HVLP spray, using the minimum amount of atomization necessary to meet product appearance standards.
- (d) Cleaning operations for resin and gel coat application equipment shall be as follows:
- (1) For routine flushing of resin and gel coat application equipment such as spray guns, flowcoaters, brushes, rollers, and squeegees, a cleaning solvent shall contain no HAPs. This standard does not apply to solvents used for removing cured resin or gel coat from application equipment.
 - (2) A source must store HAP-containing solvents used for removing cured resin or gel coat in containers with covers. The covers must have no visible gaps and must be in place at all times, except when equipment is placed in or removed from the container.
 - (3) Recycled solvents that contain less than or equal to five percent (5%) HAP by weight are considered to contain no HAP for the purposes of this subsection.
- (e) The source may comply with this section using monthly emission averaging within each resin or gel coat application category listed in subsection (d) without prior approval by the commissioner.

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

For averaging within a category:

$$E_{m_A} \leq (M_R * E_a)$$

Where:

M_R = Total monthly mass of material within each category

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

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

- (f) Upon written application by the source, the commissioner may approve the following:
- (1) Enforceable alternative emission reduction techniques that are at least as protective of the environment as the emission standards in subsections (a) through (e).
 - (2) Use of monthly emissions averaging for any or all material or application categories listed in subsection (a) if the following conditions are met:
 - (A) The source shows that emissions did not exceed the emissions that would have occurred if each emission unit had met the requirements of subsections (a) through (e).
 - (B) The source uses one or more of the following emission reduction techniques:
 - (i) Resins or gel coats with HAP monomer contents lower than specified in subsection (a).
 - (ii) Vapor suppressed resins.
 - (iii) Vacuum bagging or other similar technique. This item does not include resin transfer molding or compression molding.
 - (iv) Air pollution control equipment where the emissions are estimated based on parametric measurements or stack monitoring.
 - (v) Controlled spray used in combination with automated actuators or robots.
 - (vi) Controlled spray that includes the following:
 - (AA) Mold flanges.
 - (BB) Spray technique.
 - (CC) Spray gun pressure.
 - (DD) Means of verifying continuous use of the controlled spray technique, such as mass balance of materials and products (surface area and thickness of product) as approved by the commissioner prior to implementation.
 - (vii) Emission reduction techniques approved under subdivision (1).
- (g) The following work practice standards shall be implemented:

- (1) For gel coats to be applied using non-atomized spray, spray equipment shall not be operated at pressures that atomize the material during the application process.
- (2) Except for mixing containers as described in item (7), HAP containing materials shall be kept in a closed container when not in use.
- (3) Solvents sprayed during cleanup and resin changes shall be directed into solvent collection containers.
- (4) Solvent collection containers shall be kept closed when not in use.
- (5) Clean-up rags with solvent shall be stored in closed containers.
- (6) Closed containers shall be used for the storage of the following:
 - (A) All production and tooling resins that contain HAPs.
 - (B) All production and tooling gel coats that contain HAPs.
 - (C) Waste resins and gel coats that contain HAPs.
 - (D) Cleaning materials, including waste cleaning materials.
 - (E) Other materials that contain HAPs.
- (7) All resin and gel coat mixing containers with a capacity equal to or greater than fifty-five (55) gallons must have a cover with no visible gaps in place at all times except when material is being added to or removed from a container, or when mixing or pumping equipment is being placed in or removed from a container.
- (h) All new and existing personnel, including contract personnel, who are involved in resin and gel coat spraying and spray-like applications (for example, those applications that could result in excess emissions if performed improperly) shall be trained according to the following schedule:
 - (1) All personnel shall be trained within fifteen (15) days of hiring.
 - (2) All personnel shall be given refresher training annually.
 - (3) Personnel who have been trained by an owner or operator subject to 326 IAC 20-25 are exempt from subdivision (1) if written documentation that the employee's training is current is provided to the new employer.
 - (4) If the result of an evaluation shows that training is needed, such training shall occur within fifteen (15) days of the evaluation.

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.

The owner or operator shall maintain the following training records on site and available for inspection and review:

- (1) A copy of the current training program.
- (2) A list of all current personnel, by name, that are required to be trained and the dates they were trained and the date of the most recent refresher training. Records of prior training programs and former personnel are not required to be maintained.

326 IAC 20-25 (Emissions from Reinforced Plastics composites Fabricating Emission Units)

Marble casting is not subject to 326 IAC 20-25 because the plastic is not fiber reinforced.

Unified Emission Factors for Open Molding of Composites

July 23, 2001

Emission Rate in Pounds of Styrene Emitted per Ton of Resin or Gelcoat Processed

Styrene content in resin/gelcoat, % ⁽¹⁾	<33 ⁽²⁾	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	>50 ⁽²⁾
Manual	0.126 x %styrene x 2000	83	89	94	100	106	112	117	123	129	134	140	146	152	157	163	169	174	180	$((0.286 \times \%styrene) - 0.0529) \times 2000$
Manual w/ Vapor Suppressed Resin VSR ⁽³⁾	Manual emission factor [listed above] x (1 - (0.50 x specific VSR reduction factor for each resin/suppressant formulation))																			
Mechanical Atomized	0.169 x %styrene x 2000	111	126	140	154	168	183	197	211	225	240	254	268	283	297	311	325	340	354	$((0.714 \times \%styrene) - 0.18) \times 2000$
Mechanical Atomized with VSR ⁽³⁾	Mechanical Atomized emission factor [listed above] x (1 - (0.45 x specific VSR reduction factor for each resin/suppressant formulation))																			
Mechanical Atomized Controlled Spray ⁽⁴⁾	0.130 x %styrene x 2000	86	97	108	119	130	141	152	163	174	185	196	207	218	229	240	251	262	273	$0.77 \times ((0.714 \times \%styrene) - 0.18) \times 2000$
Mechanical Controlled Spray with VSR	Mechanical Atomized Controlled Spray emission factor [listed above] x (1 - (0.45 x specific VSR reduction factor for each resin/suppressant formulation))																			
Mechanical Non-Atomized	0.107 x %styrene x 2000	71	74	77	80	83	86	89	93	96	99	102	105	108	111	115	118	121	124	$((0.157 \times \%styrene) - 0.0165) \times 2000$
Mechanical Non-Atomized with VSR ⁽³⁾	Mechanical Non-Atomized emission factor [listed above] x (1 - (0.45 x specific VSR reduction factor for each resin/suppressant formulation))																			
Filament application	0.184 x %styrene x 2000	122	127	133	138	144	149	155	160	166	171	177	182	188	193	199	204	210	215	$((0.2746 \times \%styrene) - 0.0298) \times 2000$
Filament application with VSR ⁽³⁾	0.120 x %styrene x 2000	79	83	86	90	93	97	100	104	108	111	115	118	122	125	129	133	136	140	$0.65 \times ((0.2746 \times \%styrene) - 0.0298) \times 2000$
Gelcoat Application	0.445 x %styrene x 2000	294	315	336	356	377	398	418	439	460	481	501	522	543	564	584	605	626	646	$((1.03646 \times \%styrene) - 0.195) \times 2000$
Gelcoat Controlled Spray Application ⁽⁴⁾	0.325 x %styrene x 2000	215	230	245	260	275	290	305	321	336	351	366	381	396	411	427	442	457	472	$0.73 \times ((1.03646 \times \%styrene) - 0.195) \times 2000$
Gelcoat Non-Atomized Application ⁽⁶⁾	SEE Note 9 below	196	205	214	223	232	241	250	259	268	278	287	296	305	314	323	332	341	350	$((0.4506 \times \%styrene) - 0.0505) \times 2000$
Covered-Cure after Roll-Out	Non-VSR process emission factor [listed above] x (0.80 for Manual <or> 0.85 for Mechanical)																			
Covered-Cure without Roll-Out	Non-VSR process emission factor [listed above] x (0.50 for Manual <or> 0.55 for Mechanical)																			

Emission Rate in Pounds of Methyl Methacrylate Emitted per Ton of Gelcoat Processed

MMA content in gelcoat, % ⁽⁶⁾	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	≈20
Gel coat application ⁽⁷⁾	15	30	45	60	75	90	105	120	135	150	165	180	195	210	225	240	255	270	285	$0.75 \times \%MMA \times 2000$

Notes

- 1 Including styrene monomer content as supplied, plus any extra styrene monomer added by the molder, but before addition of other additives such as powders, fillers, glass,...etc.
- 2 Formulas for materials with styrene content < 33% are based on the emission rate at 33% (constant emission factor expressed as percent of available styrene), and for styrene content > 50% on the emission rate based on the extrapolated factor equations; these are not based on test data but are believed to be conservative estimates. The value for "% styrene" in the formulas should be input as a fraction. For example, use the input value 0.30 for a resin with 30% styrene content by wt.
- 3 The VSR reduction factor is determined by testing each resin/suppressant formulation according to the procedures detailed in the **CFA Vapor Suppressant Effectiveness Test**.
- 4 SEE the **CFA Controlled Spray Handbook** for a detailed description of the controlled spray procedures.
- 5 The effect of vapor suppressants on emissions from filament winding operations is based on the **Dow Filament Winding Emissions Study**.
- 6 Including MMA monomer content as supplied, plus any extra MMA monomer added by the molder, but before addition of other additives such as powders, fillers, glass,...etc.
- 7 Based on gelcoat data from **NMMA Emission Study**.
- 8 SEE the July 17, 2001 EECS report **Emission Factors for Non-Atomized Application of Gel Coats used in the Open Molding of Composites** for a detailed description of the non-atomized gelcoat testing.
- 9 Use the equation $((0.4506 \times \%styrene) - 0.0505) \times 2000$ for gelcoats with styrene contents between 19% and 32% by wt.; use the equation $0.185 \times \%styrene \times 2000$ for gelcoats with less than 19% styrene content by wt.