



Joseph E. Kernan  
Governor

Lori F. Kaplan  
Commissioner

July 7, 2004

100 North Senate Avenue  
P.O. Box 6015  
Indianapolis, Indiana 46206-6015  
(317) 232-8603  
(800) 451-6027  
www.in.gov/idem

TO: Interested Parties / Applicant

RE: Engineered Polymer Solutions, Inc. / F039-16867-00147

FROM: Paul Dubenetzky  
Chief, Permits Branch  
Office of Air Quality

### Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures  
FNPER.dot 9/16/03



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**FEDERALLY ENFORCEABLE STATE  
OPERATING PERMIT (FESOP)  
OFFICE OF AIR QUALITY**

**Engineered Polymer Solutions Inc., d/b/a Valspar Coatings  
28335 Clay Street  
Elkhart, Indiana 46517**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

**The Permittee must comply with all conditions of this permit. Noncompliance with any provision of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; and denial of a permit renewal application. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.**

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 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.: F 039-16867-00147	
Issued by: Original signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: July 7, 2004  Expiration Date: July 7, 2009

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**Stratospheric Ozone Protection**

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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 2-8-3(b)]

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The Permittee owns and operates a stationary gelcoat and paint manufacturing source.

Authorized individual:	Plant Manager
Source Address:	28335 Clay Street, Elkhart, Indiana 46517
Mailing Address:	28335 Clay Street, Elkhart, Indiana 46517
General Source Phone:	574 - 522 - 1062
SIC Code:	2851
Source Location Status:	Elkhart County
	Nonattainment for 8-hour ozone
	Attainment for all remaining criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP)
	Minor Source, under PSD Rules and Nonattainment New Source Review Rules;
	Minor Source, Section 112 of the Clean Air Act

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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

- (a) One (1) gelcoat mixing area, identified as CF1, constructed in 1995, equipped with two baghouses for particulate control, exhausting to Stacks DC1 and DC2, consisting of the following equipment:
- (1) Three (3) mix tanks, capacity: 1,100 gallons each;
  - (2) One (1) mix tank, capacity: 2,400 gallons;
  - (3) Four (4) mix tanks, capacity: 1,100 gallons, each;
  - (4) Two (2) mix tanks, capacity: 1,200 gallons, each;
  - (5) One (1) mix tank, capacity: 1,000 gallons;
  - (6) One (1) mix tank, capacity: 2,400 gallons;
  - (7) One (1) putty mix tank, constructed in 2001, capacity: 500 gallons;
  - (8) Ten (10) portable tanks, capacity: fifty-five (55) gallons, each;
  - (9) Two (2) portable tanks, capacity: one hundred ten (110) gallons, each;
  - (10) Seven (7) portable tanks, capacity: one hundred sixty five (165) gallons, each;
  - (11) Three (3) portable tanks, capacity: two hundred twenty (220) gallons, each;

- (12) Ten (10) portable tanks, capacity: three hundred thirty (330) gallons, each;
  - (13) Six (6) portable tanks, capacity: four hundred forty (440) gallons, each;
  - (14) Ten (10) portable tanks, capacity: five hundred fifty (550) gallons, each;
  - (15) Twelve (12) portable tanks, capacity: six hundred sixty (660) gallons, each;
  - (16) One (1) soup tank;
  - (17) One (1) five (5) horsepower lightning blender;
  - (18) Three (3) Myers 4-stage hydraulic units (blenders);
  - (19) One (1) fifteen (15) horsepower Myers blender;
  - (20) One (1) ten (10) horsepower Myers blender;
  - (21) One (1) one hundred and twenty five (125) horsepower two-speed disperser;
  - (22) Two (2) 30/60 horsepower two-speed dispersers with sweep arm;
  - (23) One (1) one hundred (100) horsepower two speed disperser;
  - (24) One (1) sixty (60) horsepower variable-speed disperser;
  - (25) One (1) fifty (50) horsepower variable-speed disperser;
  - (26) One (1) thirty-five (35) horsepower variable-speed disperser;
  - (27) One (1) twenty-five (25) horsepower variable-speed disperser;
  - (28) One (1) thirty (30) horsepower variable-speed disperser;
  - (29) One (1) 12-inch duct fan;
  - (30) Two (2) dry filters; and
  - (31) One (1) three thousand (3,000) acfm fabric filter.
- (b) Two (2) spray paint booths used for testing the coatings for consistency and color sprayed onto glass plates, identified as SB1 and SB2, constructed in 1994, each equipped with one (1) air atomization spray gun and dry filters for particulate control, capacity: twenty-five (25) plates per hour and seven (7) plates per hour, respectively.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour.
- (b) Combustion source flame safety purging on startup.

- (c) The following VOC and HAP storage containers:
- (d) Vessels storing lubricating oil, hydraulic oils, machining oils, and machining fluids.
- (e) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-3-2] [326 IAC 8-3-5]
- (f) Closed loop heating and cooling systems.
- (g) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (h) Asbestos abatement projects regulated by 326 IAC 14-10.
- (i) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (j) Filter or coalescer media changeout.
- (k) A laboratory as defined in 326 IAC 2-7-1(21)(D).
- (l) One (1) tote washing machine which uses solvent to clean empty coating containers.
- (m) Two (2) fixed-roof above-ground organic solvent storage tanks, capacity: ten thousand (10,000) gallons, each.
- (n) Six (6) fixed-roof above-ground solvent-based resins storage tanks, capacity: six thousand (6,000) gallons, each.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) for a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permits 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) deletedby this permit.
- (b) All previous registrations and permits are superseded by this permit.

## **SECTION B GENERAL CONDITIONS**

### **B.1 Permit No Defense [IC 13]**

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 FESOP under 326 IAC 2-8.

### **B.2 Definitions [326 IAC 2-8-1]**

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2, and 326 IAC 2-7) shall prevail.

### **B.3 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5]**

This permit is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

### **B.4 Enforceability [326 IAC 2-8-6]**

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

### **B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]**

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 2-8-3(h) and 326 IAC 2-8-9.

### **B.6 Severability [326 IAC 2-8-4(4)]**

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 2-8-4(5)(D)]**

This permit does not convey any property rights of any sort, or any exclusive privilege.

### **B.8 Duty to Provide Information [326 IAC 2-8-4(5)(E)]**

(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.

(b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1 when furnishing copies of requested records directly to U.S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

### **B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]**

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an authorized individual 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, using the attached Certification Form, with each submittal requiring certification.
- (c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

B.11 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (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 initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications 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 Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
  - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;
  - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
  - (5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.12 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

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

If due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

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

The PMP extension notification does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

**B.13 Emergency Provisions [326 IAC 2-8-12]**

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- (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 2-8-12.
- (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 describes 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 and Northern Regional Office, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section) or,  
Telephone No.: 317-233-5674 (ask for Compliance Section)  
Facsimile No.: 317-233-5967  
Northern Regional Office: 574-245-4870, Facsimile Number: 574-245-4877

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management  
Compliance 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 2-8-4(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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.

- (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 material of substantial economic value.
- Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.
- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.14 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), 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 need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination  
[326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP 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 2-8-4(5)(C)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (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 2-8-8(a)]
- (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 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(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 2-8-8(c)]

B.16 Permit Renewal [326 IAC 2-8-3(h)]

- (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 2-8-3. 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). The renewal application does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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, IN 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]
  - (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 until the renewal permit has been issued or denied.

- (c) Right to Operate After Application for Renewal [326 IAC 2-8-9]  
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 2-8 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 needed to process the application.

B.17 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 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 shall be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]
- (d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

B.18 Operational Flexibility [326 IAC 2-8-15] [326 IAC 2-8-11.1]

- (a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without 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 2-8-11.1 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 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-8-15(b)(2), (c)(1), and (d).

- (b) Emission Trades [326 IAC 2-8-15(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 2-8-15(c).
- (c) Alternative Operating Scenarios [326 IAC 2-8-15(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 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

B.19 Permit Revision Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

B.20 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-17-3-2] [IC13-30-3-1]

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 FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.21 Transfer of Ownership or Operational Control [326 IAC 2-8-10] [IC 13-17-3-2]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 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 require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.22 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) 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 317-233-4320 (ask for OAQ, Billing, Licensing, and Training Section (BLT)), to determine the appropriate permit fee.

**SECTION C SOURCE OPERATION CONDITIONS**

Entire Source

**Emissions Limitations and Standards [326 IAC 2-8-4(1)]**

**C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [40 CFR 52 Subpart P][326 IAC 6-3-2]**

- (a) Pursuant to 40 CFR 52 Subpart P, particulate matter emissions 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.
- (b) Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

**C.2 Overall Source Limit [326 IAC 2-8]**

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

- (a) Pursuant to 326 IAC 2-8:
  - (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall also make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable;
  - (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
  - (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
- (b) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.
- (c) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

**C.3 Opacity [326 IAC 5-1]**

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

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

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

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

C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

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The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2.

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

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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).

C.7 Operation of Equipment [326 IAC 2-8-5(a)(4)]

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Except as otherwise provided by statute, rule or 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.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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- (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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) **Procedures for Asbestos Emission Control**  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and renovation**  
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana 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 to use an Indiana Accredited Asbestos inspector is not federally enforceable.

### **Testing Requirements [326 IAC 2-8-4(3)]**

#### **C.9 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 protocol submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

**Compliance Requirements [326 IAC 2-1.1-11]**

**C.10 Compliance Requirements [326 IAC 2-1.1-11]**

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The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U.S. EPA.

**Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

**C.11 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]**

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Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, 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 inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Unless otherwise specified in the approval for the new emissions unit, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

**C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]**

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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, 40 CFR 60 Appendix B, 40 CFR 63 or other approved methods as specified in this permit.

**C.13 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)] [326 IAC 2-8-5(1)]**

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- (a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (" 2%) of full scale reading.
- (b) Whenever a condition in this permit requires the measurement of a temperature, flow rate, or pH level, the instrument employed shall have a scale such that the expected

normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (" 2%) of full scale reading.

- (c) The Preventive Maintenance Plan for the pH meter shall include calibration using known standards. The frequency of calibration shall be adjusted such that the typical error found at calibration is less than one pH point.
- (d) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

**Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

**C.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]**

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If a regulated substance as defined in 40 CFR 68 is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

**C.15 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-8-4] [326 IAC 2-8-5]**

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- (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 is 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 time frame 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, and it will be ten (10) days or more until the unit or device will be shut down, then the Permittee shall promptly

notify the IDEM, OAQ of the expected date of the shut down. The notification shall also include the status of the applicable compliance monitoring parameter with respect to normal, and the results of the response actions taken up to the time of notification.

- (4) Failure to take reasonable response steps shall be considered a deviation from 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 2-8-12 (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.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

- (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 response action documents submitted pursuant to this condition do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

### **Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]**

#### **C.17 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]**

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

#### **C.18 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]**

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (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 Branch, 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, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) The first report covered the period commencing on the date of issuance of the original FESOP and ended on the last day of the reporting period. All subsequent reporting periods shall be based on calendar years.

### **Stratospheric Ozone Protection**

#### **C.19 Compliance with 40 CFR 82 and 326 IAC 22-1**

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with 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 2-8-4(10)]: Gelcoat and Paint Manufacturing**

- (a) One (1) gelcoat mixing area, identified as CF1, constructed in 1995, equipped with two bag-houses for particulate control, exhausting to Stacks DC1 and DC2, consisting of the following equipment:
- (1) Three (3) mix tanks, capacity: 1,100 gallons each;
  - (2) One (1) mix tank, capacity: 2,400 gallons;
  - (3) Four (4) mix tanks, capacity: 1,100 gallons, each;
  - (4) Two (2) mix tanks, capacity: 1,200 gallons, each;
  - (5) One (1) mix tank, capacity: 1,000 gallons;
  - (6) One (1) mix tank, capacity: 2,400 gallons;
  - (7) One (1) putty mix tank, constructed in 2001, capacity: 500 gallons;
  - (8) Ten (10) portable tanks, capacity: fifty-five (55) gallons, each;
  - (9) Two (2) portable tanks, capacity: one hundred ten (110) gallons, each;
  - (10) Seven (7) portable tanks, capacity: one hundred sixty five (165) gallons, each;
  - (11) Three (3) portable tanks, capacity: two hundred twenty (220) gallons, each;
  - (12) Ten (10) portable tanks, capacity: three hundred thirty (330) gallons, each;
  - (13) Six (6) portable tanks, capacity: four hundred forty (440) gallons, each;
  - (14) Ten (10) portable tanks, capacity: five hundred fifty (550) gallons, each;
  - (15) Twelve (12) portable tanks, capacity: six hundred sixty (660) gallons, each;
  - (16) One (1) soup tank;
  - (17) One (1) five (5) horsepower lightning blender;
  - (18) Three (3) Myers 4-stage hydraulic units (blenders);
  - (19) One (1) fifteen (15) horsepower Myers blender;
  - (20) One (1) ten (10) horsepower Myers blender;
  - (21) One (1) one hundred and twenty five (125) horsepower two-speed disperser;

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

**Facility Description [326 IAC 2-8-4(10)]: Gelcoat and Paint Manufacturing - Continued**

- (22) Two (2) 30/60 horsepower two-speed dispersers with sweep arm;
  - (23) One (1) one hundred (100) horsepower two speed disperser;
  - (24) One (1) sixty (60) horsepower variable-speed disperser;
  - (25) One (1) fifty (50) horsepower variable-speed disperser;
  - (26) One (1) thirty-five (35) horsepower variable-speed disperser;
  - (27) One (1) twenty-five (25) horsepower variable-speed disperser;
  - (28) One (1) thirty (30) horsepower variable-speed disperser;
  - (29) One (1) 12-inch duct fan;
  - (30) Two (2) dry filters; and
  - (31) One (1) three thousand (3,000) acfm fabric filter.
- (b) Two (2) spray paint booths used for testing the coatings for consistency and color sprayed onto glass plates, identified as SB1 and SB2, constructed in 1994, each equipped with one (1) air atomization spray gun and dry filters for particulate control, capacity: twenty-five (25) plates per hour and seven (7) plates per hour, respectively.

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

### **Emission Limitations and Standards [326 IAC 2-8-4(1)]**

#### **D.1.1 Hazardous Air Pollutants (HAPs) [326 IAC 2-8-4]**

- (a) The emissions of any single HAP from the one (1) gelcoat mixing area (CF1) and the two (2) spray booths (SB1 and SB2), shall be limited to less than a total of 9.5 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (b) The emissions of any combination of HAPs from the one (1) gelcoat mixing area (CF1) and the two (2) spray booths (SB1 and SB2), shall be limited to less than a total of 24.5 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Therefore, the requirements of 326 IAC 2-7 are not applicable. Compliance with the above limitations will ensure that this source is not a major source of HAPs as defined in 40 CFR 63.2.

#### **D.1.2 Volatile Organic Compounds [326 IAC 8-1-6]**

- (a) The VOC emissions from the one (1) gelcoat mixing area, identified as CF1, shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period, with compliance determined at the end of each month. Therefore, the requirements of 326 IAC 8-1-6 are not applicable to CF1.
- (b) Any change or modification at the two (2) spray booths that would increase the potential VOC emissions to twenty-five (25) tons per year or more, may cause the facility to be subject to 326 IAC 8-1-6, and shall require prior approval from IDEM, OAQ.

**D.1.3 Particulate Matter (PM) [40 CFR 52 Subpart P]**

Pursuant to 40 CFR 52 Subpart P, the particulate from the gelcoat mixing area (CF1) and two (2) spray booths (SB1 and SB2) shall not exceed the pound per hour emission rate established as E in the following formula:

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:

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

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

Pursuant to T 039-7428-00147, issued on December 17, 1998 and 326 IAC 6-3-2(d), particulate from the two (2) spray booths (SB1 and SB2), shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

**D.1.5 Preventive Maintenance Plan [326 IAC 2-8-4(9)]**

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the gelcoat mixing area (CF1) and any control devices.

**Compliance Determination Requirements**

**D.1.6 HAPs Emissions**

- (a) Compliance with Condition D.1.1(a) shall be determined by using the methodologies contained in the U.S. EPA Inventory Improvement Program Volume II: Chapter 8, Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Facilities, August 2000, and shall be demonstrated at the end of each month based on the production for the most recent twelve (12) month period.
- (b) Compliance with Condition D.1.1(b) shall be demonstrated at the end of each month based on the HAPs usage for the most recent twelve (12) month period. Compliance shall be determined using formulation and production data supplied by the Permittee.

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

- (a) Compliance with the VOC emission limitation contained in Condition D.1.2(a) shall be determined by using the methodologies contained in the U.S. EPA Inventory Improvement Program Volume II: Chapter 8, Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Facilities, August 2000, and shall be demonstrated at the end of each month based on the production for the most recent twelve (12) month period.
- (b) Compliance with the VOC usage limitation contained in Condition D.1.2(b) shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation and production data supplied by the Permittee. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

**D.1.8 Particulate Control**

Pursuant to T 039-7428-00147, issued on December 17, 1998, and in order to comply with Condition D.1.3, the baghouse for particulate control shall be in operation and control emissions from the gelcoat mixing area (CF1) at all times that raw materials that have the potential to release particulate emissions are being dispensed into the manufacturing equipment.

## **Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

### **D.1.9 Visible Emissions Notations**

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- (a) Visible emission notations of the gelcoat mixing area (CF1) stack exhausts shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

### **D.1.10 Parametric Monitoring**

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The Permittee shall record the total static pressure drop across the baghouses used in conjunction with the gelcoat mixing area (CF1), at least once per shift when the process is in operation. When for any one reading, the pressure drop across the baghouses is outside the normal range of 0.5 and 3.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ and shall be calibrated at least once every six (6) months.

### **D.1.11 Baghouse Inspections**

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An inspection shall be performed each calendar quarter of all bags controlling the gelcoat mixing area (CF1). Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

### **D.1.12 Broken or Failed Bag Detection**

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In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and

Reports, shall be considered a deviation from this permit. If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

- (b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

### **Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

#### **D.1.13 Record Keeping Requirements**

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAPs emission limits established in Condition D.1.1. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
- (1) The amount and HAP content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used;
  - (2) The HAPs usage for each month;
  - (3) The weight of each HAP emitted for each compliance period; and
  - (4) The calculations used to quantify HAPs emissions from the gelcoat production area (CF1), including all equations and assumptions. The Permittee shall calculate HAPs emissions using the U.S. EPA Inventory Improvement Program Volume II: Chapter 8, Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Facilities, August 2000.
- (b) To document compliance with Condition D.1.2(a), the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC emission limit established in Condition D.1.2(a). Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
- (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used;
  - (2) The VOC usage for each month;
  - (3) The weight of VOC emitted for each compliance period; and

- (4) The calculations used to quantify VOC emissions from the gelcoat production area (CF1), including all equations and assumptions. The Permittee shall calculate VOC emissions using the U.S. EPA Inventory Improvement Program Volume II: Chapter 8, Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Facilities, August 2000.
- (c) To document compliance with Conditions D.1.2(b), the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limit established in Condition D.1.2(b). Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
  - (1) The VOC content of each coating material and solvent used.
  - (2) The amount of coating material and solvent less water used on a monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
  - (3) The total VOC usage for each month; and
  - (4) The weight of VOCs emitted for each compliance period.
- (d) To document compliance with Condition D.1.9, the Permittee shall maintain records of visible emission notations of the gelcoat mixing area (CF1) stack exhausts once per shift.
- (e) To document compliance with Condition D.1.10, the Permittee shall maintain records once per shift of the total static pressure drop.
- (f) To document compliance with Condition D.1.11, the Permittee shall maintain records of the results of the inspections required under Condition D.1.11.
- (g) To document compliance with Condition D.1.5, the Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (h) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.1.14 Reporting Requirements

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A quarterly summary of the information to document compliance with Conditions D.1.1(a), D.1.1(b) and D.1.2(a) 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. The report submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

## SECTION D.2

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-8-4(10)]: Insignificant Activities

Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6 [326 IAC 8-3-2] [326 IAC 8-3-5]

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

### Emission Limitations and Standards [326 IAC 2-8-4(1)]

#### D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, the Permittee shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

#### D.2.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), for cold cleaner degreaser operations without remote solvent reservoirs, the Permittee shall ensure that the following control equipment requirements are met:

- (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
  - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
  - (B) The solvent is agitated; or
  - (C) The solvent is heated.
- (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under

the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

- (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
  - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
  - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
    - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
    - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
    - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), for cold cleaning facilities, the Permittee shall ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
  - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
  - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
CERTIFICATION**

Source Name: Engineered Polymer Solutions Inc., d/b/a Valspar Coatings  
Source Address: 28335 Clay Street, Elkhart, Indiana 46517  
Mailing Address: 28335 Clay Street, Elkhart, Indiana 46517  
FESOP No.: F 039-16867-00147

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

Please check what document is being certified:

- Annual Compliance Certification Letter
- Test Result (specify) \_\_\_\_\_
- Report (specify) \_\_\_\_\_
- Notification (specify) \_\_\_\_\_
- Affidavit (specify) \_\_\_\_\_
- Other (specify) \_\_\_\_\_

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

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE BRANCH  
P.O. Box 6015  
100 North Senate Avenue  
Indianapolis, Indiana 46206-6015  
Phone: 317-233-5674  
Fax: 317-233-5967**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
EMERGENCY OCCURRENCE REPORT**

Source Name: Engineered Polymer Solutions Inc., d/b/a Valspar Coatings  
Source Address: 28335 Clay Street, Elkhart, Indiana 46517  
Mailing Address: 28335 Clay Street, Elkhart, Indiana 46517  
FESOP No.: F 039-16867-00147

**This form consists of 2 pages**

**Page 1 of 2**

- This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
  - The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

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

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

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

Page 2 of 2

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

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

A certification is not required for this report.

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

**FESOP Quarterly Report**

Source Name: Engineered Polymer Solutions Inc., d/b/a Valspar Coatings  
Source Address: 28335 Clay Street, Elkhart, Indiana 46517  
Mailing Address: 28335 Clay Street, Elkhart, Indiana 46517  
FESOP No.: F 039-16867-00147  
Facilities: CF1, SB1 and SB2  
Parameter: Worst Case Single HAP Emissions  
Limit: Less than a total of 9.5 tons per twelve (12) consecutive month period, with compliance determined at the end of each month

YEAR: \_\_\_\_\_

Month	Single HAP (tons)	Single HAP (tons)	Single HAP (tons)
	This Month	Previous 11 Months	12 Month Total

- No deviation occurred in this month.
- Deviation/s occurred in this month.  
Deviation has been reported on \_\_\_\_\_

Submitted by: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

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

**FESOP Quarterly Report**

Source Name: Engineered Polymer Solutions Inc., d/b/a Valspar Coatings  
Source Address: 28335 Clay Street, Elkhart, Indiana 46517  
Mailing Address: 28335 Clay Street, Elkhart, Indiana 46517  
FESOP No.: F 039-16867-00147  
Facilities: CF1, SB1 and SB2  
Parameter: Total HAP Emissions  
Limit: Less than a total of 24.5 tons per twelve (12) consecutive month period, with compliance determined at the end of each month

YEAR: \_\_\_\_\_

Month	Total HAPs (tons)	Total HAPs (tons)	Total HAPs (tons)
	This Month	Previous 11 Months	12 Month Total

- No deviation occurred in this month.
- Deviation/s occurred in this month.  
Deviation has been reported on \_\_\_\_\_

Submitted by: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

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

**FESOP Quarterly Report**

Source Name: Engineered Polymer Solutions Inc., d/b/a Valspar Coatings  
Source Address: 28335 Clay Street, Elkhart, Indiana 46517  
Mailing Address: 28335 Clay Street, Elkhart, Indiana 46517  
FESOP No.: F 039-16867-00147  
Facility: CF1  
Parameter: VOC Emissions  
Limit: Less than twenty-five (25) tons per twelve (12) consecutive month period, with compliance determined at the end of each month

YEAR: \_\_\_\_\_

Month	VOC Emissions (tons)	VOC Emissions (tons)	VOC Emissions (tons)
	This Month	Previous 11 Months	12 Month Total

- No deviation occurred in this month.
- Deviation/s occurred in this month.  
Deviation has been reported on \_\_\_\_\_

Submitted by: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

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

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Engineered Polymer Solutions Inc., d/b/a Valspar Coatings  
Source Address: 28335 Clay Street, Elkhart, Indiana 46517  
Mailing Address: 28335 Clay Street, Elkhart, Indiana 46517  
FESOP No.: F 039-16867-00147

Months: \_\_\_\_\_ to \_\_\_\_\_ Year: \_\_\_\_\_

Page 1 of 2

<p>This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".</p>	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

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

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

A certification is not required for this report.

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

Technical Support Document (TSD) for a  
Federally Enforceable State Operating Permit (FESOP)

**Source Background and Description**

<b>Source Name:</b>	<b>Engineered Polymer Solutions Inc., d/b/a Valspar Coatings</b>
<b>Source Location:</b>	<b>28335 Clay Street, Elkhart, Indiana 46517</b>
<b>County:</b>	<b>Elkhart</b>
<b>SIC Code:</b>	<b>2851</b>
<b>Operation Permit No.:</b>	<b>F 039-16867-00147</b>
<b>Permit Reviewer:</b>	<b>Edward A. Longenberger</b>

The Office of Air Quality (OAQ) has reviewed a FESOP application from Engineered Polymer Solutions Inc., d/b/a Valspar Coatings relating to the operation of a gelcoat and paint manufacturing source.

**History**

Engineered Polymer Solutions Inc., d/b/a Valspar Coatings was issued a Part 70 Operating Permit on December 17, 1998 for the gelcoat and paint manufacturing source. The Part 70 Permit contained a VOC limitation on the manufacturing operations of less than twenty-five (25) tons per year, in order to render the requirements of 326 IAC 8-1-6 not applicable. In December 2002, a Significant Permit Modification was issued which limited facility-wide HAPs emissions to less than the major source levels, in order to render the requirements of 40 CFR Part 63, Subparts FFFF and HHHHH not applicable. These limitations also have the effect of limiting emissions to below the Part 70 thresholds. Therefore, the Permittee has chosen to operate under the terms and conditions of the FESOP permit program, instead of renewing their Part 70 Operating Permit.

**Permitted Emission Units and Pollution Control Equipment**

The source consists of the following permitted emission units and pollution control devices:

- (a) One (1) gelcoat mixing area, identified as CF1, constructed in 1995, equipped with two baghouses for particulate control, exhausting to Stacks DC1 and DC2, consisting of the following equipment:
- (1) Three (3) mix tanks, capacity: 1,100 gallons each;
  - (2) One (1) mix tank, capacity: 2,400 gallons;
  - (3) Four (4) mix tanks, capacity: 1,100 gallons, each;
  - (4) Two (2) mix tanks, capacity: 1,200 gallons, each;
  - (5) One (1) mix tank, capacity: 1,000 gallons;
  - (6) One (1) mix tank, capacity: 2,400 gallons;
  - (7) One (1) putty mix tank, constructed in 2001, capacity: 500 gallons;

- (8) Ten (10) portable tanks, capacity: fifty-five (55) gallons, each;
  - (9) Two (2) portable tanks, capacity: one hundred ten (110) gallons, each;
  - (10) Seven (7) portable tanks, capacity: one hundred sixty five (165) gallons, each;
  - (11) Three (3) portable tanks, capacity: two hundred twenty (220) gallons, each;
  - (12) Ten (10) portable tanks, capacity: three hundred thirty (330) gallons, each;
  - (13) Six (6) portable tanks, capacity: four hundred forty (440) gallons, each;
  - (14) Ten (10) portable tanks, capacity: five hundred fifty (550) gallons, each;
  - (15) Twelve (12) portable tanks, capacity: six hundred sixty (660) gallons, each;
  - (16) One (1) soup tank;
  - (17) One (1) five (5) horsepower lightning blender;
  - (18) Three (3) Myers 4-stage hydraulic units (blenders);
  - (19) One (1) fifteen (15) horsepower Myers blender;
  - (20) One (1) ten (10) horsepower Myers blender;
  - (21) One (1) one hundred and twenty five (125) horsepower two-speed disperser;
  - (22) Two (2) 30/60 horsepower two-speed dispersers with sweep arm;
  - (23) One (1) one hundred (100) horsepower two speed disperser;
  - (24) One (1) sixty (60) horsepower variable-speed disperser;
  - (25) One (1) fifty (50) horsepower variable-speed disperser;
  - (26) One (1) thirty-five (35) horsepower variable-speed disperser;
  - (27) One (1) twenty-five (25) horsepower variable-speed disperser;
  - (28) One (1) thirty (30) horsepower variable-speed disperser;
  - (29) One (1) 12-inch duct fan;
  - (30) Two (2) dry filters; and
  - (31) One (1) three thousand (3,000) acfm fabric filter.
- (b) Two (2) spray paint booths used for testing the coatings for consistency and color sprayed onto glass plates, identified as SB1 and SB2, constructed in 1994, each equip-

ped with one (1) air atomization spray gun and dry filters for particulate control, capacity: twenty-five (25) plates per hour and seven (7) plates per hour, respectively.

### **Unpermitted Emission Units and Pollution Control Equipment**

There are no unpermitted emission units operating at this source during this review process.

### **Insignificant Activities**

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour.
- (b) Combustion source flame safety purging on startup.
- (c) The following VOC and HAP storage containers:
- (d) Vessels storing lubricating oil, hydraulic oils, machining oils, and machining fluids.
- (e) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-3-2] [326 IAC 8-3-5]
- (f) Closed loop heating and cooling systems.
- (g) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (h) Asbestos abatement projects regulated by 326 IAC 14-10.
- (i) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (j) Filter or coalescer media changeout.
- (k) A laboratory as defined in 326 IAC 2-7-1(21)(D).
- (l) One (1) tote washing machine which uses solvent to clean empty coating containers.
- (m) Two (2) fixed-roof above-ground organic solvent storage tanks, capacity: ten thousand (10,000) gallons, each.
- (n) Six (6) fixed-roof above-ground solvent-based resins storage tanks, capacity: six thousand (6,000) gallons, each.

### **Existing Approvals**

The source has been operating under the following previous approvals including:

- (a) T 039-7428-00147, issued on December 17, 1998;

- (b) MPM 039-12993-00147, issued on April 12, 2001;
- (c) Reopening 039-13257-00147, issued on January 15, 2002;
- (d) AA 039-15221-00147, issued on February 7, 2002; and
- (e) SPM 039-15899-00147, issued on December 3, 2002.

All conditions from previous approvals were incorporated into this FESOP except the following:

T 039-7428-00147 issued on December 17, 1998

Condition D.1.1, the production limit of 1,600,000 gallons per year of gelcoat produced at CF1, in order to limit VOC emissions from CF1 to less than twenty-five (25) tons per year. This limit rendered the requirements of 326 IAC 8-1-6 not applicable.

Reason not incorporated: The VOC emissions from CF1 are still limited to less than twenty-five (25) tons per year. However, the facility will demonstrate compliance with the limit by calculating VOC emissions in accordance with the U.S. EPA Inventory Improvement Program Volume II: Chapter 8, Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Facilities. This methodology is consistent with the source-wide HAPs emission limitation which was included in the Part 70 permit through SPM 039-15899-00147, issued December 3, 2002. As a result, the annual production limit is no longer needed.

### **Enforcement Issue**

There are no enforcement actions pending.

### **Recommendation**

The staff recommends to the Commissioner that the FESOP 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 administratively complete and timely Title V renewal application for the purposes of this review was received on December 4, 2002. On March 18, 2004, the Permittee requested to process the application as a FESOP instead of a Title V renewal.

There was no notice of completeness letter mailed to the source.

### **Potential to Emit**

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U.S. EPA, the department, or the appropriate local air pollution control agency."

Pollutant	Potential to Emit (tons/yr)
PM	Less than 100
PM <sub>10</sub>	Less than 100
SO <sub>2</sub>	Less than 100
VOC	Less than 100
CO	Less than 100
NO <sub>x</sub>	Less than 100

HAPs	Potential to Emit (tons/yr)
Styrene	Greater than 10
Total HAPs	Less than 25

The potential to emit (as defined in 326 IAC 2-7-1(29)) of a single HAP (Styrene) is equal to or greater than ten (10) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7. The source will be issued a FESOP because the source will limit its emissions below the Title V levels.

**Potential to Emit After Issuance**

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

Process/emission unit	Potential To Emit (tons/year)						
	PM	PM <sub>10</sub>	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
CF1	2.0	2.0	-	Less than 25.0	-	-	Single less than 9.5
SB1 and SB2	0.2	0.2	-	1.0	-	-	Total less than 24.5
Insignificant Activities	1.0	1.0	0.5	1.0	0.5	0.5	0.5
Total Emissions	3.2	3.2	0.5	Less than 27.0	0.5	0.5	Single less than 10.0 Total less than 25.0

- (a) CF1 is limited to less than twenty-five (25) tons per year of VOC in order to render the requirements of 326 IAC 8-1-6 not applicable.

- (b) CF1 and the two (2) spray booths (SB1 and SB2) are limited to less than a total of 9.5 tons per year of a single HAP and less than a total of 24.5 tons per year of combined HAPs in order to ensure that the source is not a major source of HAPs as defined in 40 CFR 63.2. This limitation allows for HAP emissions of 0.5 tons per year from the insignificant activities.

### County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM <sub>10</sub>	Attainment
SO <sub>2</sub>	Attainment
NO <sub>2</sub>	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. Elkhart County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.
- (b) Elkhart County has been classified as attainment or unclassifiable for all remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.
- (c) Fugitive Emissions  
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 or 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

### Source Status

Existing Source PSD, Part 70, or FESOP Definition (emissions after controls, based on 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/yr)
PM	Less than 100
PM <sub>10</sub>	Less than 100
SO <sub>2</sub>	Less than 100
VOC	Less than 100
CO	Less than 100
NO <sub>x</sub>	Less than 100
Single HAP	Less than 10
Combination HAPs	Less than 25

This existing source is **not** a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or greater and it is not in one of the 28 listed source categories.

#### Federal Rule Applicability

- (a) This Part 70 Operating Permit does not involve a pollutant-specific emissions unit as defined in 40 CFR 64.1 for any criteria pollutant with the potential to emit before controls equal to or greater than the major source threshold. Therefore, the requirements of 40 CFR 64, Compliance Assurance Monitoring, are not applicable.
- (b) The insignificant storage tanks are not subject to the requirements of the New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60), 40 CFR 60.110b, Subpart Kb, because each tank has a storage capacity less than seventy-five (75) cubic meters.
- (c) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Miscellaneous Coating Manufacturing (40 CFR 63, Subpart HHHHH), because the Permittee has accepted a federally enforceable limitation which ensures that this gelcoat and paint manufacturing source is not a major source of HAPs, as defined in 40 CFR 63.2.
- (d) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Miscellaneous Organic Chemical Manufacturing and Miscellaneous Coating Manufacturing (40 CFR 63, Subpart FFFF), because the Permittee has accepted a federally enforceable limitation which ensures that this gelcoat and paint manufacturing facility is not a major source of HAPs, as defined in 40 CFR 63.2.
- (e) The insignificant degreasing operations are not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs), Subpart T (40 CFR 63.460-469) because no halogenated HAP solvents are used.

### **State Rule Applicability – Entire Source**

#### 326 IAC 2-6 (Emission Reporting)

This source is located in Elkhart County and is not required to have an operating permit under 326 IAC 2-7 (Part 70 Permit Program). Therefore, the requirements of 326 IAC 2-6 do not apply.

#### 326 IAC 5-1 (Opacity Limitations)

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

### **State Rule Applicability – Individual Facilities**

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

- (a) The emissions of any single HAP from the one (1) gelcoat mixing area (CF1) and the two (2) spray booths (SB1 and SB2), shall be limited to less than a total of 9.5 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (b) The emissions of any combination of HAPs from the one (1) gelcoat mixing area (CF1) and the two (2) spray booths (SB1 and SB2), shall be limited to less than a total of 24.5 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with these HAPs limitations shall be determined as follows:

- (a) For the one (1) gelcoat mixing area (CF1), HAPs emissions shall be determined by using the methodologies contained in the US EPA Inventory Improvement Program Volume II: Chapter 8, Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Facilities. Records of the HAPs emissions and all supporting calculations shall be kept on a monthly basis and shall be sufficient to demonstrate compliance for the most recent twelve (12) month period.
- (b) For the two (2) spray booths (SB1 and SB2), compliance shall be demonstrated at the end of each month based on the HAPs usage for the most recent twelve (12) month period. Compliance shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation and production data supplied by the Permittee. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Therefore, the requirements of 326 IAC 2-7 are not applicable, and this source is not a major source of HAPs as defined in 40 CFR 63.2.

#### 326 IAC 6-3-2 (Process Operations)

On June 12, 2002, revisions to 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) became effective; this rule was previously referred to as 326 IAC 6-3 (Process Operations). As of the date this permit is being issued these revisions have not been approved by EPA into the Indiana State Implementation Plan (SIP); therefore, the following requirements from the previous version of 326 IAC 6-3 (Process Operations) which has been approved into the SIP will remain applicable requirements until the revisions to 326 IAC 6-3 are approved into the SIP and the condition is modified in a subsequent permit action.

Pursuant to 40 CFR 52, Subpart P the particulate from the gelcoat mixing area (CF1) and the two (2) spray booths (SB1 and SB2) 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:

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

Under the rule revision, particulate from the surface coating booths shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications. Pursuant to T 039-7428-00147, issued on December 17, 1998, the bag-houses for particulate control shall be in operation and control emissions from the gelcoat mixing area (CF1) at all times that raw materials that have the potential to release particulate emissions are being dispensed into the manufacturing equipment.

#### 326 IAC 8-1-6 (New facilities; general reduction requirements)

- (a) The VOC emissions from the one (1) gelcoat mixing area, identified as CF1, shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period, with compliance determined at the end of each month. Therefore, the requirements of 326 IAC 8-1-6 are not applicable to CF1.

Compliance with this limitation shall be determined by using the methodologies contained in the U.S. EPA Inventory Improvement Program Volume II: Chapter 8, Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Facilities, and shall be demonstrated at the end of each month based on the VOC usage for the most recent twelve (12) month period.

- (b) Any change or modification at the two (2) spray booths (SB1 and SB2) that would increase the potential VOC emissions to twenty-five (25) tons per year or more, may cause the facilities to be subject to 326 IAC 8-1-6, and shall require prior approval from IDEM, OAQ.

#### **State Rule Applicability – Insignificant Activities**

#### 326 IAC 8-3-2 (Cold Cleaner Operations)

Pursuant to 326 IAC 8-3-2, for cold cleaning operations constructed after January 1, 1980, the Permittee shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control)

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), for cold cleaner degreaser operations without remote solvent reservoirs, the Permittee shall ensure that the following control equipment requirements are met:
  - (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
    - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
    - (B) The solvent is agitated; or
    - (C) The solvent is heated.
  - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
  - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
  - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
  - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32)

millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):

- (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
  - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
  - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), for cold cleaning facilities, the Permittee shall ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
  - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
  - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

### Testing Requirements

All emission calculations are based on material usage and production records in conjunction with the U.S. EPA Inventory Improvement Program Volume II: Chapter 8, Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing. Therefore, no testing is required.

### Compliance Requirements

Permits issued under 326 IAC 2-8 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 2-8-4. 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 in Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforce-

ment 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 this source are as follows:

- (a) The gelcoat mixing area (CF1) has applicable compliance monitoring conditions as specified below:
  - (1) Visible emission notations of the gelcoat mixing area (CF1) stack exhausts shall be performed once per shift during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting start up or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emissions is observed.
  - (2) The Permittee shall record the total static pressure drop across the baghouses controlling the gelcoat mixing area (CF1), at least once per shift when the gelcoat mixing area (CF1) is in operation. When for any one reading, the pressure drop across the baghouses is outside the normal range of 0.5 and 3.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
  - (3) An inspection shall be performed each calendar quarter of all bags controlling the gelcoat mixing area (CF1). Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.
  - (4) In the event that bag failure has been observed:
    - (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit. If operations

continue after bag failure is observed and it will be ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

- (b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

These monitoring conditions are necessary because the baghouses for the gelcoat mixing area (CF1) must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-8 (FESOP).

- (b) The two (2) spray booths (SB1 and SB2) 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. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks 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 Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
  - (2) Monthly inspections shall be performed of the coating emissions from the stacks 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 Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

These monitoring conditions are necessary because the dry filters for the two (2) spray booths (SB1 and SB2) must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-8 (FESOP).

## **Conclusion**

The operation of this gelcoat and paint manufacturing source shall be subject to the conditions of the **FESOP 039-16867-00147**.

## Indiana Department of Environmental Management Office of Air Quality

### Addendum to the Technical Support Document for a Federally Enforceable State Operating Permit (FESOP)

**Source Name:** Engineered Polymer Solutions Inc., d/b/a Valspar Coatings  
**Source Location:** 28335 Clay Street, Elkhart, Indiana 46517  
**County:** Elkhart  
**FESOP:** F 039-16867-00147  
**SIC Code:** 2851  
**Permit Reviewer:** Edward A. Longenberger

On April 19, 2004, the Office of Air Quality (OAQ) had a notice published in the The Truth in Elkhart, Indiana, stating that Engineered Polymer Solutions Inc., d/b/a Valspar Coatings had applied for a Federally Enforceable State Operating Permit (FESOP) to operate a gelcoat and paint manufacturing source. The notice also stated that OAQ proposed to issue a FESOP for this operation and provided information on how the public could review the proposed FESOP and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this FESOP should be issued as proposed.

On May 19, 2004, Alex Iacoli of Engineered Polymer Solutions d/b/a Valspar Coatings submitted comments on the proposed FESOP. The comments are as follows: The permit language, if changed, has deleted language as ~~strikeouts~~ and new language **bolded**.

#### Comment 1:

The Emission Inventory Improvement Program (EIIP) calculation methodology is referenced in several permit conditions (see Pages 27 and 30). The EIIP emission calculations are based on the production of each categorical coating manufacturer at the plant. Therefore, Valspar requests changes the language from VOC or HAP usage to production. In addition, Valspar requests adding the revision date of August 2000 to the permit language. Therefore, Valspar requests that these sections read: **Compliance with this limitation shall be determined by using the methodologies contained in the U.S. EPA Emission Inventory Improvement Program Volume II: Chapter 8, Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Facilities, August 2000, and shall be demonstrated at the end of each month based on the production for the most recent twelve (12) month period.**

#### Response 1:

As a result of this comment, IDEM, OAQ has made the following changes to Conditions D.1.6, D.1.7 and D.1.14:

#### D.1.6 HAPs Emissions

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- (a) Compliance with Condition D.1.1(a) shall be determined by using the methodologies contained in the U.S. EPA Inventory Improvement Program Volume II: Chapter 8, Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Facilities, August 2000, and shall be demonstrated at the end of each month based on the **production** ~~HAP usage~~ for the most recent twelve (12) month period.

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

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- (a) Compliance with the VOC emission limitation contained in Condition D.1.2(a) shall be determined by using the methodologies contained in the U.S. EPA Inventory Improvement Program Volume II: Chapter 8, Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Facilities, August 2000, and shall be demonstrated at the end of each month based on the **production VOC usage** for the most recent twelve (12) month period.

D.1.14 Record Keeping Requirements

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- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAPs emission limits established in Condition D.1.1. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
- (4) The calculations used to quantify HAPs emissions from the gelcoat production area (CF1), including all equations and assumptions. The Permittee shall calculate HAPs emissions using the U.S. EPA Inventory Improvement Program Volume II: Chapter 8, Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Facilities, August 2000.
- (b) To document compliance with Condition D.1.2(a), the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC emission limit established in Condition D.1.2(a). Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
- (4) The calculations used to quantify VOC emissions from the gelcoat production area (CF1), including all equations and assumptions. The Permittee shall calculate VOC emissions using the U.S. EPA Inventory Improvement Program Volume II: Chapter 8, Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Facilities, August 2000.

**Comment 2:**

Condition D.1.9(a) of the draft FESOP requires visible emission notations once per shift of the gelcoat mixing area stack exhausts. Particulate emissions from this source are controlled by a baghouse and it should not have visible emissions. Valspar feels that this permit condition is onerous and burdensome. Valspar requests modifying the permit requirement to monthly visible notations.

Condition D.1.10 of the draft FESOP requires recording the total static pressure drop across the baghouse once per shift of the gelcoat mixing area stack exhausts. Valspar feels that this permit condition is onerous and burdensome. Valspar believes that a weekly pressure drop reading would be appropriate for a properly operated and maintained baghouse. Valspar requests modifying the permit requirement to weekly pressure drop readings.

### Response 2:

326 IAC 2-8-4(3) requires that every FESOP contain monitoring requirements which assure that all reasonable information is provided to evaluate continuous compliance with the applicable requirements. The suggested wording would allow sporadic use of compliance monitoring, which would not ensure continuous compliance. Since no visible emissions are expected from the gelcoat mixing area stacks, the occurrence of visible emissions from the stacks would indicate a problem with the control equipment, and would make the Permittee aware that corrective action is required. Baghouse failure can occur suddenly; therefore monitoring of baghouse operational parameters should be more frequently than weekly or even daily in such cases where a source operates more than one shift per day. The OAQ believes that visible emissions notations and pressure drop readings once per operating shift are reasonable requirements. Therefore, no change to the permit has been made as a result of these comments.

### Comment 3:

Condition D.1.13 of the Draft FESOP requires daily inspections of the placement, integrity, and particulate loading of the dry particulate filters on the two (2) spray booths. In addition, this permit condition requires weekly overspray observations from the surface coating booth stacks, and monthly inspections of the presence of overspray on the rooftops and nearby ground. One spray booth is used for research and development and is used infrequently; the other is used for quality control/assurance purposes and is operated for minutes at a time several times per day. Valspar feels that this permit condition is onerous and burdensome. **Valspar requests monthly inspections of the filters. In addition, Valspar requests removing the overspray observation requirements.**

### Response 3:

Engineered Polymer Solutions Inc., d/b/a Valspar Coatings manufactures paints and gelcoats. These two (2) spray booths (SB1 and SB2) are used for research and development of new paint blends, and for quality control/assurance of paints and gelcoats that are in production. As such, the overspray particulate emissions from these spray booths are not expected to be environmentally significant. IDEM, OAQ agrees that these monitoring requirements, which are typically reserved for production spray booths, should not be required for the two (2) research and development and QA/QC spray booths (SB1 and SB2).

Therefore, Condition D.1.13 and the associated record keeping requirement in Condition D.1.14(g) have been removed from the permit, as follows:

#### ~~D.1.13 Monitoring~~

- ~~(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks 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 Plan Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.~~
- ~~(b) Monthly inspections shall be performed of the coating emissions from the stacks 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 Response Plan Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.~~

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

#### D.1.14 Record Keeping Requirements

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- (f) To document compliance with Condition D.1.11, the Permittee shall maintain records of the results of the inspections required under Condition D.1.11.
- ~~(g) To document compliance with Condition D.1.13, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.~~
- ~~(g h)~~ To document compliance with Condition D.1.5, the Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan.
- ~~(h i)~~ All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Upon further review, the OAQ has decided to make the following changes to the FESOP: The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language is **bolded**):

#### Change 1:

Due to the recent designation of Elkhart County as nonattainment for the 8-hour ozone standard, the County Attainment Status section of the Technical Support Document is inaccurate. However, IDEM, OAQ prefers that the Technical Support Document reflect the document that was on public notice. Changes to the technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of issues are documented and part of the record regarding this permit decision. The changes are as follows:

#### County Attainment Status

The source is located in Elkhart County.

<b>Pollutant</b>	<b>Status</b>
PM <sub>10</sub>	Attainment
SO <sub>2</sub>	Attainment
NO <sub>2</sub>	Attainment
<b>1-Hour Ozone</b>	Maintenance Attainment
<b>8-Hour Ozone</b>	<b>Nonattainment</b>
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. Elkhart County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.~~ **Volatile organic compounds (VOC) and Nitrogen Oxides (NO<sub>x</sub>) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for nonattainment new source review.**

- (b) Elkhart County has been classified as attainment or unclassifiable for all remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.
- (c) Fugitive Emissions  
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 or 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

### Change 2:

Section A.1 of the permit is also changed as a result of the designation of Elkhart County as nonattainment for the 8-hour ozone standard:

#### A.1 General Information [326 IAC 2-8-3(b)]

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The Permittee owns and operates a stationary gelcoat and paint manufacturing source.

Authorized individual:	Plant Manager
Source Address:	28335 Clay Street, Elkhart, Indiana 46517
Mailing Address:	28335 Clay Street, Elkhart, Indiana 46517
General Source Phone:	574 - 522 - 1062
SIC Code:	2851
Source Location Status:	Elkhart County
	<b>Nonattainment for 8-hour ozone</b>
Source Status:	Attainment for all <b>remaining</b> criteria pollutants Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD Rules <b>and Nonattainment New Source Review Rules</b> ; Minor Source, Section 112 of the Clean Air Act

### Change 3:

Condition B.22 is amended as shown to reflect the new name for the IDEM, OAQ billing section:

#### B.22 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

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- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.

- (b) 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 317-233-4320 (ask for OAQ, ~~IM & Billing Section~~ **Billing, Licensing, and Training Section (BLT)**), to determine the appropriate permit fee.

**Change 4:**

The Quarterly Deviation and Compliance Monitoring Report Form has been corrected to be consistent with Condition B.14(a) of the permit:

Page 1 of 2

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. **A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.** ~~Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report.~~ Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD