



Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

May 5, 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: Godfrey Marine-Syracuse Plant / 085-17518-00022

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, 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 4-21.5-3-7 and IC 13-15-6-1(b) or IC 13-15-6-1(a) 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.

For an **initial Title V Operating Permit**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **thirty (30)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(b).

For a **Title V Operating Permit renewal**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **fifteen (15)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(a).

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.

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of an initial Title V operating permit, permit renewal, or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impracticable to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency
401 M Street
Washington, D.C. 20406

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.



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PART 70 OPERATING PERMIT RENEWAL OFFICE OF AIR QUALITY

**Godfrey Marine - Syracuse Plant
300 East Chicago Street
Syracuse, Indiana 46567**

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

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T085-17518-00022	
Issued by: Original signed by Janet McCabe Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: May 5, 2004 Expiration Date: May 5, 2009

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary aluminum boat manufacturing plant.

Responsible Official:	Plant Manager
Source Address:	300 East Chicago Street, Syracuse, IN 46567
Mailing Address:	300 East Chicago Street, Syracuse, IN 46567
General Source Phone Number:	(574) 457-2082
SIC Code:	3732
County Location:	Kosciusko
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD Rules; Major Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

- (a) seven (7) air atomization paint spray booths, identified as Paint Booth #1 - 7, each with a maximum capacity of 7.97 gallons of coating material per hour, using air filters as paint booth overspray control, and exhausting to stacks S31, S50, S32, S33, S35, S51 and S52, respectively; and
- (b) one (1) adhesive application area, for carpet installation, consisting of nine (9) glue guns, identified as Glue Guns #1 - #9, with a maximum capacity of applying 14.04 gallons of adhesive per hour per glue gun.

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

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

- (a) hand application for xylene cleaning of pontoon boots; and [326 IAC 8-1-6]
- (b) hand application for lacquer cleaning of hull-type boats. [326 IAC 8-1-6]
- (c) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 cubic feet per minute, including the following; deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations. [326 IAC 6-3]
- (d) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. [40 CFR 52 Subpart P]

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

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

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

SECTION B

GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

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

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

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.3 Enforceability [326 IAC 2-7-7]

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.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.5 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

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

B.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]

- (a) The Permittee shall furnish to IDEM, OAQ within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). 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.8 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

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

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

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

and

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

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

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

**B.10 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]
[326 IAC 1-6-3]**

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) 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.

- (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 "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.11 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality,
Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted 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 2-7-5(3)(C)(ii) and must contain the

following:

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

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

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

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

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance,

IDEM, OAQ shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ has issued the modification. [326 IAC 2-7-12(b)(8)]

B.13 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.

B.14 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

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

Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

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

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

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination

[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.16 Permit Renewal [326 IAC 2-7-4]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality

100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
- (1) A timely renewal application is one that is:
- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.
- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAQ fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.17 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:
- Indiana Department of Environmental Management
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 "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]
- (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 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)]

[326 IAC 2-7-12 (b)(2)]

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.19 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:
- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
 - (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
 - (4) The Permittee notifies the:

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

and

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

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and
 - (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-7-20(b)(1), (c)(1), and (e)(2).
- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

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

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-7-10.5.

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

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

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

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

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
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 "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

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

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

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

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

- C.1 Particulate 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 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.3 Open Burning [326 IAC 4-1] [IC 13-17-9]
- The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.
- C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]
- The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.
- C.5 Fugitive Dust Emissions [326 IAC 6-4]
- The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.
- C.6 Operation of Equipment [326 IAC 2-7-6(6)]
- Except as otherwise provided by statute or 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.7 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC 1-7-1(3), 1-7-2, 1-7-3(c) and (d), 1-7-4, and 1-7-5(a), (b), and (d) are not federally enforceable.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
- (2) If there is a change in the following:
- (A) Asbestos removal or demolition start date;
- (B) Removal or demolition contractor; or
- (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, 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 2-7-6(1)]

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

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

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

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

C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

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 the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

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

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.

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

C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

- (a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures in January 1998.
- (b) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level.
[326 IAC 1-5-3]

C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

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

C.15 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:
 - (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.
 - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee

documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.

- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
 - (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
 - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
 - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, 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 a minor permit modification 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, in accordance with Section D, response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all

monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

**C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
[326 IAC 2-7-6]**

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

**C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)]
[326 IAC 2-6]**

- (a) The Permittee shall submit an emission statement certified pursuant to the requirements of 326 IAC 2-6. This statement must be received in accordance with the compliance schedule specified in 326 IAC 2-6-3 and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal shall cover the period identified in 326 IAC 2-6. The annual emission statement shall meet the following requirements:
 - (1) Indicate estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
 - (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(32) ("Regulated pollutant which is used only for purposes of Section 19 of this rule") from the source, for purposes of Part 70 fee assessment.

- (b) The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

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

- (c) The emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

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

-
- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. 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.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

- (a) The Permittee 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 "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) Unless otherwise specified in this permit, 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 "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.20 Compliance with 40 CFR 82 and 326 IAC 22-1

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

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

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

SECTION D.1

FACILITY OPERATION CONDITIONS

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

- (a) seven (7) air atomization paint spray booths, identified as Paint Booth #1 - 7, each with a maximum capacity of 7.97 gallons of coating material per hour, using air filters as paint booth overspray control, and exhausting to stacks S31, S50, S32, S33, S35, S51 and S52, respectively; and
- (b) one (1) adhesive application area, for carpet installation, consisting of nine (9) glue guns, identified as Glue Guns #1 - #9, with a maximum capacity of applying 14.04 gallons of adhesive per hour per glue gun.

Insignificant Activities:

- (a) hand application for xylene cleaning of pontoon boots; and [326 IAC 8-1-6]
- (b) hand application for lacquer cleaning of hull-type boats. [326 IAC 8-1-6]

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

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

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6] [326 IAC 2-2]

Pursuant to T085-6496-00022, issued on October 1, 1998, the VOC input usage at each of the seven (7) paint spray booths and the one (1) adhesive application area shall be limited to twenty-four (24) tons per twelve (12) consecutive month period with compliance demonstrated at the end of each month. Therefore, the best available control technology (BACT) requirement in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) and 326 IAC 2-2 (PSD) do not apply.

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

Any change or modification which may increase VOC usage for hand wiping cleaning solvent operations to 25 tons per year shall require OAQ's prior approval.

D.1.3 General Provisions Relating to NESHAP [326 IAC 20-1][40 CFR Part 63, Subpart A]

The provisions of 40 CFR 63 Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facilities described in this section except when otherwise specified in 40 CFR 63 Subpart VVVV.

D.1.4 Emissions Standards for Boat Manufacturing [40 CFR Part 63.5743, Subpart VVVV] [326 IAC 20]

Pursuant to 40 CFR 63.5743(a), the Permittee must comply with either the separate emission limits in paragraphs (a) and (b) below, or the combined emission limit in paragraph (c) below. Compliance with these limitations is based on a 12-month rolling average that is calculated at the end of every month.

- (a) The emissions from aluminum wipedown solvents shall be limited to no more than 0.33 kilograms of organic HAP per liter of total coating solids applied from aluminum primers, clear coats, and top coats combined. No limit applies when cleaning surfaces are receiving decals or adhesive graphics.
- (b) The emissions from aluminum recreational boat surface coatings (including thinners, activators, primers, topcoats, and clear coats) shall be limited to no more than 1.22 kilograms of organic HAP per liter of total coating solids applied from aluminum primers, clear coats, and top coats combined.
- (c) The emissions from the combined aluminum surface coatings and aluminum wipedown solvents shall be limited to no more than 1.55 kilograms of organic HAP per liter of total

coating solids applied from aluminum primers, clear coats, and top coats combined.

D.1.5 Compliance With Work Practice Standards [40 CFR Part 63.5743, Subpart VVVV] [326 IAC 20]

Pursuant to 40 CFR 63.5743(b), the Permittee shall comply with the following work practice standard when cleaning aluminum coating spray guns with solvents containing more than 5 percent organic HAP by weight:

- (a) Clean spray guns in an enclosed device. Keep the device closed except when you place spray guns in or remove them from the device.
- (b) Disassemble the spray gun and manually clean the components in a vat. Keep the vat closed when you are not using it.
- (c) Clean spray guns by placing solvent in the pressure pot and forcing the solvent through the gun. Do not use atomizing air during this procedure. Direct the used cleaning solvent from the spray gun into a container that you keep closed when you are not using it.
- (d) An alternative gun cleaning process or technology approved by the Administrator according to the procedures in 40 CFR 63.6(g).

D.1.6 Compliance Requirements for Boat Manufacturing [40 CFR Part 63.5755, Subpart VVVV] [326 IAC 20]

Pursuant to 40 CFR 63.5755, the Permittee must demonstrate compliance with the aluminum coating spray gun cleaning work practice standards by meeting the requirements of paragraph (a) or (b) of this section.

- (a) Demonstrate that solvents used to clean the aluminum coating spray guns contain no more than 5 percent organic HAP by weight by determining organic HAP content with the methods in Sec. 63.5758. Keep records of the organic HAP content determination.
- (b) For solvents containing more than 5 percent organic HAP by weight, comply with the requirements in paragraph (b)(1) or (b)(2), and paragraph (b)(3) of this section.
 - (1) For an enclosed spray gun cleaner, visually inspect it at least once per month to ensure that covers are in place and the covers have no visible gaps when the cleaner is not in use, and that there are no leaks from hoses or fittings.
 - (2) If the source is manually cleaning the gun or spraying solvent into a container that can be closed, visually inspect all solvent containers at least once per month to ensure that the containers have covers and the covers fit with no visible gaps.
 - (3) Keep records of the monthly inspections and any repairs that are made to the enclosed gun cleaners or the covers.

D.1.7 Particulate Matter (PM) [40 CFR 52 Subpart P]

Pursuant to T085-6496-00022, issued on October 1, 1998 and 40 CFR 52 Subpart P, the PM from the seven (7) paint spray booths 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:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.1.8 Particulate [326 IAC 6-3-2(d)]

Pursuant to T085-6496-00022, issued on October 1, 1998 and 326 IAC 6-3-2(d), particulate from the seven (7) paint spray booths shall be controlled by air filters, and the Permittee shall operate the control devices in accordance with manufacturer's specifications.

D.1.9 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and their control devices.

Compliance Determination Requirements

D.1.10 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. 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.1.11 Determination Requirements for Boat Manufacturing [40 CFR Part 63.5746, Subpart VVVV] [326 IAC 20]

- (a) Pursuant to 40 CFR 63.5746 the Permittee shall demonstrate compliance with the emission limits in Conditions D.1.4 and D.1.6 for aluminum wipedown solvents and aluminum coatings specified in 40 CFR 63.5743(a), by meeting the following requirements:
- (1) Determine and record the organic HAP content (kilograms of organic HAP per kilogram of material, or weight fraction) of each aluminum wipedown solvent and aluminum coating (including primers, topcoats, clear coats, thinners, and activators). Use the methods in 40 CFR 63.5758 to determine organic HAP content.
 - (2) Use the methods in 40 CFR 63.5758(b) to determine the solids content (liters of solids per liter of coating, or volume fraction) of each aluminum surface coating, including primers, topcoats, and clear coats. Keep records of the solids content.
 - (3) Use the methods in 40 CFR 63.5758(c) to determine the density of each aluminum surface coating and wipedown solvent.
 - (4) Compliance is based on a 12-month rolling average calculated at the end of every month. The first 12-month rolling-average period begins on the compliance date specified in 40 CFR 63.5695.
 - (5) At the end of the twelfth month after the compliance date and at the end of every subsequent month, use the procedures in 40 CFR 63.5749 to calculate the organic HAP from aluminum wipedown solvents per liter of coating solids, and use the procedures in 40 CFR 63.5752 to calculate the kilograms of organic HAP from aluminum coatings per liter of coating solids.
 - (6) Keep records of the calculations used to determine compliance.
 - (7) Approval of alternative means of demonstrating compliance. The Permittee may apply to the Administrator for permission to use an alternative means (such as an add-on control system) of limiting emissions from aluminum wipedown solvent and coating operations and demonstrating compliance with the emission limits in 40 CFR 63.5743(a).

- (A) The application must include the information listed in the following paragraphs of this section.
- (i) An engineering evaluation that compares the emissions using the alternative means to the emissions that would result from using the strategy specified in paragraphs (a) through (e) of Sec. 63.5746. The engineering evaluation may include the results from an emission test that accurately measures the capture efficiency and control device efficiency achieved by the control system and the composition of the associated coatings so that the emissions comparison can be made.
 - (ii) A proposed monitoring protocol that includes operating parameter values to be monitored for compliance and an explanation of how the operating parameter values will be established through a performance test.
 - (iii) Details of appropriate recordkeeping and reporting procedures.
- (B) The Administrator will approve the alternative means of limiting emissions if the Administrator determines that HAP emissions will be no greater than if the source uses the procedures described in paragraphs (1) through (5) of this section to demonstrate compliance.
- (C) The Administrator's approval may specify operation, maintenance, and monitoring requirements to ensure emissions from the regulated operations are no greater than those that would otherwise result from regulated operations in compliance with this subpart.
- (b) Pursuant to 40 CFR 63.5749, the Permittee shall calculate the organic HAP content of aluminum wipedown solvents as follows:
- (1) Use the following equation to calculate the weighted-average organic HAP content of aluminum wipedown solvents used in the past 12 months.

$$\text{HAP}_{\text{WD}} = \frac{\sum_{j=1}^n (\text{Vol}_j)(D_j)(W_j)}{\sum_{i=1}^m (\text{Vol}_i)(\text{Solids}_i)} \quad (\text{Eq. 1})$$

Where:

- HAP_{WD} = weighted-average organic HAP content of aluminum wipedown solvents, kilograms of HAP per liter of total coating solids from aluminum primers, top coats, and clear coats.
- n = number of different wipedown solvents used in the past 12 months.
- Vol_j = volume of aluminum wipedown solvent j used in the past 12 months, liters.
- D_j = density of aluminum wipedown solvent j , kilograms per liter.
- W_j = mass fraction of organic HAP in aluminum wipedown solvent j .
- m = number of different aluminum surface coatings (primers, top coats, and clear coats) used in the past 12 months.
- Vol_i = volume of aluminum primer, top coat, or clear coat i used in the past 12 months, liters.

Solids_i = solids content aluminum primer, top coat, or clear coat i, liter solids per liter of coating.

(2) Compliance is based on a 12-month rolling average. If the weighted-average organic HAP content does not exceed 0.33 kilograms of organic HAP per liter of total coating solids, then the source is in compliance with the emission limit specified in Sec. 63.5743(a)(1).

(c) Pursuant to 40 CFR 63.5752, the Permittee shall calculate the organic HAP content of aluminum recreational boat surface coatings as follows:

(1) Use the following equation to calculate the weighted-average HAP content for all aluminum surface coatings used in the past 12 months.

$$HAP_{WD} = \frac{\sum_{i=1}^m (Vol_i)(D_i)(W_i) + \sum_{k=1}^D (Vol_k)(D_k)(W_k)}{\sum_{i=1}^m (Vol_i)(Solids_i)} \quad (\text{Eq. 1})$$

Where:

HAP_{SC} = weighted-average organic HAP content for all aluminum coating materials, kilograms of organic HAP per liter of coating solids.

m = number of different aluminum primers, top coats, and clear coats used in the past 12 months.

Vol_i = volume of aluminum primer, top coat, or clear coat i used in the past 12 months, liters.

D_i = density of coating i, kilograms per liter.

W_i = mass fraction of organic HAP in coating i, kilograms of organic HAP per kilogram of coating.

p = number of different thinners, activators, and other coating additives used in the past 12 months.

Vol_k = total volume of thinner, activator, or additive k used in the past 12 months, liters.

D_k = density of thinner, activator, or additive k, kilograms per liter.

W_k = mass fraction of organic HAP in thinner, activator, or additive k, kilograms of organic HAP per kilogram of thinner or activator.

Solids_i = solids content of aluminum primer, top coat, or clear coat i, liter solids per liter of coating.

(2) Compliance is based on a 12-month rolling average. If the weighted-average organic HAP content does not exceed 1.22 kilograms of organic HAP per liter of coating solids, then the source is in compliance with the emission limit specified in Sec. 63.5743(a)(2).

(d) Pursuant to 40 CFR 63.5753, the Permittee shall calculate the combined organic HAP content of aluminum wipedown solvents and aluminum recreational boat surface coatings as follows:

(1) Use the following equation to calculate the combined weighted-average organic HAP content of aluminum wipedown solvents and aluminum recreational boat surface coatings.

$$HAP_{\text{Combined}} = HAP_{WD} + HAP_{SC}$$

Where:

HAP_{WD} = the weighted-average organic HAP content of aluminum wipedown solvents used in the past 12 months, calculated using equation 1 of Sec. 63.5749.

HAP_{SC} = the weighted average organic HAP content of aluminum recreational boat surface coatings used in the past 12 months, calculated using equation 1 of Sec. 63.5752.

- (2) Compliance is based on a 12-month rolling average. If the combined organic HAP content does not exceed 1.55 kilograms of organic HAP per liter of total coating solids, then the source is in compliance with the emission limit specified in Sec. 63.5743(a)(3).

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

D.1.12 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the air filters, weekly observations shall be made of the overspray from the seven (7) paint spray booths 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 violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

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

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 VOC usage limits and/or the VOC 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 of coating material and solvent less water used on monthly basis.
- (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
- (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
- (2) The cleanup solvent usage for each month;

- (3) The total VOC usage for each month; and
- (4) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.1.2, the Permittee shall maintain records of VOC usage for hand wiping cleaning solvent.
- (c) To document compliance with Condition D.1.11, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.14 Boat Manufacturing Record Keeping Requirements [40 CFR Part 63, Subpart VVVV]
[326 IAC 20]

-
- (a) Pursuant to 40 CFR 63.5767, the Permittee must keep the following records, in addition to records specified in individual sections of this subpart.
 - (1) A copy of each notification and report that is submitted to comply with this subpart.
 - (2) All documentation supporting any notification or report that is submitted.
 - (3) If the facility is not controlled by an add-on control device (i.e., the source is complying with organic HAP content limits, application equipment requirements, or MACT model point value averaging provisions), the Permittee must keep the records specified in paragraphs (a)(3)(A) through (a)(3)(C) of this section.
 - (A) The total amounts of open molding production resin, pigmented gel coat, clear gel coat, tooling resin, and tooling gel coat used per month and the weighted-average organic HAP contents for each operation, expressed as weight-percent. For open molding production resin and tooling resin, the Permittee must also record the amounts of each applied by atomized and nonatomized methods.
 - (B) The total amount of each aluminum coating used per month (including primers, top coats, clear coats, thinners, and activators) and the weighted-average organic HAP content as determined in 40 CFR 63.5752.
 - (C) The total amount of each aluminum wipedown solvent used per month and the weighted-average organic HAP content as determined in Sec. 63.5749.
 - (b) Pursuant to 40 CFR 63.5770, the Permittee shall comply with the following:
 - (1) Records must be readily available and in a form so they can be easily inspected and reviewed.
 - (2) The Permittee must keep each record for 5 years following the date that each record is generated.
 - (3) Keep each record on site for at least 2 years after the date that each record is generated. The records can be kept offsite for the remaining 3 years.
 - (4) Records may be kept on paper or an alternative media, such as microfilm, computer, computer disks, magnetic tapes, or on microfiche.

D.1.15 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

D.1.16 Boat Manufacturing Reporting Requirements [40 CFR Part 63, Subpart VVVV] [326 IAC 20]

- (a) Pursuant to 40 CFR 63.5761, the Permittee shall:
- (1) Submit all of the notifications in Table 7 to this subpart that apply by the date in the table.
 - (2) If the Permittee change any information submitted in any notification, the Permittee must submit the changes in writing to IDEM, OAQ within 15 calendar days after the change.
- (b) Pursuant to 40 CFR 63.5764(a), the Permittee must submit each applicable report specified in paragraphs (b) through (e) of Sec. 63.5764. To the extent possible, each report must be organized according to the operations covered by this subpart and the compliance procedure followed for that operation.
- (c) Pursuant to 40 CFR 63.5764(b), unless the IDEM, OAQ has approved a different schedule for submission of reports under Sec. 63.10(a), the Permittee must submit each report by the dates according to the following:
- (1) The first compliance report must cover the period beginning 12 months after the compliance date specified in 40 CFR 63.5695 and ending on June 30 or December 31, whichever date is the first date following the end of the first 12-month period after the compliance date that is specified in 40 CFR 63.5695.
 - (2) The first compliance report must be postmarked or delivered no later than 60 calendar days after the end of the compliance reporting period specified in paragraph (c)(1) of this section.
 - (3) Each subsequent compliance report must cover the applicable semiannual reporting period from January 1 through June 30 or from July 1 through December 31.
 - (4) Each subsequent compliance report must be postmarked or delivered no later than 60 calendar days after the end of the semiannual reporting period.
 - (5) For each affected source that is subject to permitting regulations pursuant to 40 CFR part 70 or 71, and if the permitting authority has established dates for submitting semiannual reports pursuant to 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), the Permittee may submit the first and subsequent compliance reports according to the dates the permitting authority has established instead of according to the dates in paragraphs (c)(1) through (4) of this section.
- (d) Pursuant to 40 CFR 63.5764(c), the compliance report must contain the following information:

- (1) Company name and address.
- (2) A statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the report.
- (3) The date of the report and the beginning and ending dates of the reporting period.
- (4) A description of any changes in the manufacturing process since the last compliance report.
- (5) A statement or table showing, for each regulated operation, the applicable organic HAP content limit, application equipment requirement, or MACT model point value averaging provision with which you are complying. The statement or table must also show the actual weighted-average organic HAP content or weighted-average MACT model point value (if applicable) for each operation during each of the rolling 12-month averaging periods that end during the reporting period.
- (6) If the source was in compliance with the emission limits and work practice standards during the reporting period, the Permittee must include a statement to that effect.
- (7) If the source deviated from an emission limit or work practice standard during the reporting period, the Permittee must also include the information listed in the following paragraphs of this section in the semiannual compliance report.
 - (A) A description of the operation involved in the deviation.
 - (B) The quantity, organic HAP content, and application method (if relevant) of the materials involved in the deviation.
 - (C) A description of any corrective action the Permittee took to minimize the deviation and actions the Permittee has taken to prevent it from happening again.
 - (D) A statement of whether or not the source was in compliance for the 12-month averaging period that ended at the end of the reporting period.

SECTION D.2

FACILITY OPERATION CONDITIONS

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

- (c) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 cubic feet per minute, including the following; deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations. [326 IAC 6-3]
- (d) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. [40 CFR 52 Subpart P]

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

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

D.2.1 Particulate [326 IAC 6-3-2] [40 CFR 52 Subpart P]

- (a) Pursuant to 326 IAC 6-3-2(e)(2), the allowable particulate emissions from grinding and machining operations shall not exceed 0.551 pounds per hour.
- (b) Pursuant to 40 CFR 52 Subpart P, the allowable particulate matter emissions rate from the welding operation shall not exceed 0.551 pounds per hour.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Godfrey Marine - Syracuse Plant
Source Address: 300 East Chicago Street, Syracuse, IN 46567
Mailing Address: 300 East Chicago Street, Syracuse, IN 46567
Part 70 Permit No.: T085-17518-00022

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Phone:

Date:

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

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: Godfrey Marine - Syracuse Plant
Source Address: 300 East Chicago Street, Syracuse, IN 46567
Mailing Address: 300 East Chicago Street, Syracuse, IN 46567
Part 70 Permit No.: T085-17518-00022

This form consists of 2 pages

Page 1 of 2

- 9** This is an emergency as defined in 326 IAC 2-7-1(12)
- C** The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
 - C** The Permittee must submit notice in writing or by facsimile within two (2) 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 ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

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

Part 70 Quarterly Report

Source Name: Godfrey Marine - Syracuse Plant
 Source Address: 300 East Chicago Street, Syracuse, IN 46567
 Mailing Address: 300 East Chicago Street, Syracuse, IN 46567
 Part 70 Permit No.: T085-17518-00022
 Facility: Seven (7) paint spray booths and the adhesive application area
 Parameter: VOC
 Limit: Twenty-four (24) tons per twelve (12) consecutive month period for each of the seven (7) paint spray booths and the adhesive application area, with compliance demonstrated at the end of each month.

YEAR: _____

Facility ID #	Month 1 VOC Usage (tons)			Month 2 VOC Usage (tons)			Month 3 VOC Usage (tons)		
	This Month	Previous 11 months	12 Month Total	This Month	Previous 11 months	12 Month Total	This Month	Previous 11 months	12 Month Total
Paint Booth #1									
Paint Booth #2									
Paint Booth #3									
Paint Booth #4									
Paint Booth #5									
Paint Booth #6									
Paint Booth #7									
Adhesive Application									

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

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

Attach a signed certification to complete this report.

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

**PART 70 OPERATING PERMIT
 QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Godfrey Marine - Syracuse Plant
 Source Address: 300 East Chicago Street, Syracuse, IN 46567
 Mailing Address: 300 East Chicago Street, Syracuse, IN 46567
 Part 70 Permit No.: T085-17518-00022

Months: _____ **to** _____ **Year:** _____

<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. 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".</p>	
<p><input checked="" type="radio"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.</p>	
<p><input checked="" type="radio"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD</p>	
<p>Permit Requirement (specify permit condition #)</p>	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
<p>Permit Requirement (specify permit condition #)</p>	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

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

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Part 70 Operating Permit Renewal

Source Background and Description

Source Name: Godfrey Marine - Syracuse Plant
Source Location: 300 East Chicago Street, Syracuse, IN 46567
County: Kosciusko
SIC Code: 3732
Operation Permit No.: T085-17518-00022
Permit Reviewer: Alic Bent/EVP

The Office of Air Quality (OAQ) has reviewed a Part 70 permit renewal application from Godfrey Marine - Syracuse Plant relating to the operation of a stationary aluminum boat manufacturing plant.

Permitted Emission Units and Pollution Control Equipment

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

- (a) seven (7) air atomization paint spray booths, identified as Paint Booth #1 - 7, each with a maximum capacity of 7.97 gallons of coating material per hour, using air filters as paint booth overspray control, and exhausting to stacks S31, S50, S32, S33, S35, S51 and S52, respectively; and
- (b) one (1) adhesive application area, for carpet installation, consisting of nine (9) glue guns, identified as Glue Guns #1 - #9, with a maximum capacity of applying 14.04 gallons of adhesive per hour per glue gun.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities 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) hand application for xylene cleaning of pontoon boots; and [326 IAC 8-1-6]
- (b) hand application for lacquer cleaning of hull-type boats. [326 IAC 8-1-6]
- (c) Natural gas fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.
- (d) Propane or liquefied petroleum gas, or butane-fired combustion sources with heat input equal to or less than six million (6,000,000) Btu per hour.

- (e) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.
- (f) A petroleum fuel, other than gasoline, dispensing facility, having as storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.
- (g) The following VOC and HAP storage containers:
 - (1) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughput less than 12,000 gallons.
 - (2) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (h) Equipment used exclusively for filling drums, pails or other packaging containers with lubricating oils, waxes and greases.
- (i) Degreasing operations, constructed in 1959, that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
- (j) Cleaners and solvents characterized as follows:
 - (1) having a vapor pressure equal to or less than 2kPa; 15 mm Hg; or 0.3 psi measured at 38 degrees C (100 F); or
 - (2) having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20 degrees C (68 F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (k) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. [40 CFR 52 Subpart P]
- (l) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs.
- (m) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (n) Paved and unpaved roads and parking lots with public access.
- (o) On site fire and emergency response training approved by the department.
- (p) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 cubic feet per minute, including the following; deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations. [326 IAC 6-3]
- (q) Other activities or categories not previously identified:
 - (1) band saw cutting of styrofoam;
 - (2) woodworking operations not controlled by fabric filter;
 - (3) Vacuum system of aluminum dust;
 - (4) Diisocyanate foam;
 - (5) Serial tag adhesives;
 - (6) Boat repair cleaners; and
 - (7) Paint Drying Ovens.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (a) Part 70 Operating Permit T085-6496-00022, issued on October 1, 1998;
- (b) First Administrative Amendment 085-14025-00022, issued on June 15, 2001;
- (c) Second Administrative Amendment 085-14365-00022, issued on August 13, 2001; and
- (d) First Reopening 085-13351-00022, issued on January 30, 2002.

All conditions from previous approvals were incorporated into this Part 70 permit.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit 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 Part 70 permit renewal application for the purposes of this review was received on January 29, 2003.

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

Emission Calculations

See Appendix A: pages 1 through 2 of this document for detailed emissions calculations

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions.

Pollutant	Potential To Emit (tons/year)
PM	greater than 100, less than 250
PM-10	greater than 100, less than 250
SO ₂	less than 100
VOC	greater than 250
CO	less than 100
NO _x	less than 100

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential To Emit (tons/year)
Xylene	greater than 10

Toluene	less than 10
Ethyl Benzene	greater than 10
MEK	greater than 10
MIBK	greater than 10
Chromium	greater than 10
Glycol Ethers	greater than 10
Naphthalene	greater than 10
Hexane	greater than 10
Methanol	greater than 10
TOTAL	greater than 25

- (a) The unrestricted potential emissions of PM-10 and VOC are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The unrestricted potential emissions of any single HAP is equal to or greater than ten (10) tons per year and the unrestricted potential emissions of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (c) **Fugitive Emissions**
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 1996 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	0.16
PM-10	0.16
VOC	54.72
Total HAP	30.73

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission

units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 operating permit.

Process/facility	Potential to Emit (tons/year)							
	PM	PM-10	SO ₂	VOC	CO	NO _x	Single HAP	Total HAPs
Paint Spray Booth	10.89 ⁽¹⁾	10.89 ⁽¹⁾	0.0	168.0 ⁽²⁾	0.0	0.0	⁽³⁾	⁽³⁾
Adhesive Application	0.96	0.96	0.0	24.0 ⁽²⁾	0.0	0.0	⁽³⁾	⁽³⁾
Hand Wipe Cleaning Solvent	0.0	0.0	0.0	16.3	0.0	0.0	11.8 (xylene)	11.8
Total Emissions	11.85	11.85	0.0	208.3	0.0	0.0	< 250	< 250

- (1) Based on controlled PM and PM10 potential emissions
- (2) Limit to render 326 IAC 8-1-6 and 326 IAC 2-2 not applicable.
- (3) HAP emissions will be limited by the VOC input limit.

County Attainment Status

The source is located in Kosciusko County.

Pollutant	Status
PM-10	Attainment
SO ₂	Attainment
NO ₂	Attainment
Ozone	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. Kosciusko 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.
- (b) Kosciusko County has been classified as attainment or unclassifiable for all other pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

- (a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.
- (b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (b) The requirements of Section 112(j) of the Clean Air Act (40 CFR Part 63.50 through 63.56) are applicable to this source because the source is a major source of HAPs (i.e., the source has the potential to emit 10 tons per year or greater of a single HAP or 25 tons per year or greater of a combination of HAPs) and the source includes one or more units that belong to one or more source categories affected by the Section 112(j) Maximum Achievable Control Technology (MACT) Hammer date of May 15, 2002.

As an existing major source of hazardous air pollutants (HAPs), this aluminum recreational boat building plant is subject to the requirements of 40 CFR 63, Subpart VVVV - National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing. This NESHAP is applicable to all major sources of HAP that were in existence on August 22, 2001. This source is required to comply with this subpart by August 23, 2004.

- (1) Pursuant to 40 CFR 63.5743(a), the Permittee must comply with either the separate emission limits in paragraphs (1)(A) and (B) of this section, or the combined emission limit in paragraph (1)(C) of this section. Compliance with these limitations is based on a 12-month rolling average that is calculated at the end of every month.
 - (A) The emissions from aluminum wipedown solvents shall be limited to no more than 0.33 kilograms of organic HAP per liter of total coating solids applied from aluminum primers, clear coats, and top coats combined. No limit applies when cleaning surfaces are receiving decals or adhesive graphics.
 - (B) The emissions from aluminum recreational boat surface coatings (including thinners, activators, primers, topcoats, and clear coats) shall be limited to no more than 1.22 kilograms of organic HAP per liter of total coating solids applied from aluminum primers, clear coats, and top coats combined.
 - (C) The emissions from the combined aluminum surface coatings and aluminum wipedown solvents shall be limited to no more than 1.55 kilograms of organic HAP per liter of total coating solids applied from aluminum primers, clear coats, and top coats combined.
- (2) Pursuant to 40 CFR 63.5743(b), the Permittee shall comply with the following work practice standard when cleaning aluminum coating spray guns with solvents containing more than 5 percent organic HAP by weight:
 - (A) Clean spray guns in an enclosed device. Keep the device closed except when you place spray guns in or remove them from the device.
 - (B) Disassemble the spray gun and manually clean the components in a vat. Keep the vat closed when you are not using it.
 - (C) Clean spray guns by placing solvent in the pressure pot and forcing the solvent through the gun. Do not use atomizing air during this procedure. Direct the used cleaning solvent from the spray gun into a container that you keep closed when you are not using it.

- (D) An alternative gun cleaning process or technology approved by the Administrator according to the procedures in 40 CFR 63.6(g).
- (3) Pursuant to 40 CFR 63.5746, the Permittee shall demonstrate compliance with the emission limits for aluminum wipedown solvents and aluminum coatings specified in 40 CFR 63.5743(a), by meeting the following requirements:
- (A) Determine and record the organic HAP content (kilograms of organic HAP per kilogram of material, or weight fraction) of each aluminum wipedown solvent and aluminum coating (including primers, topcoats, clear coats, thinners, and activators). Use the methods in 40 CFR 63.5758 to determine organic HAP content.
 - (B) Use the methods in 40 CFR 63.5758(b) to determine the solids content (liters of solids per liter of coating, or volume fraction) of each aluminum surface coating, including primers, topcoats, and clear coats. Keep records of the solids content.
 - (C) Use the methods in 40 CFR 63.5758(c) to determine the density of each aluminum surface coating and wipedown solvent.
 - (D) Compliance is based on a 12-month rolling average calculated at the end of every month. The first 12-month rolling-average period begins on the compliance date specified in 40 CFR 63.5695.
 - (E) At the end of the twelfth month after the compliance date and at the end of every subsequent month, use the procedures in 40 CFR 63.5749 to calculate the organic HAP from aluminum wipedown solvents per liter of coating solids, and use the procedures in 40 CFR 63.5752 to calculate the kilograms of organic HAP from aluminum coatings per liter of coating solids.
 - (F) Keep records of the calculations used to determine compliance.
 - (G) Approval of alternative means of demonstrating compliance. The Permittee may apply to the Administrator for permission to use an alternative means (such as an add-on control system) of limiting emissions from aluminum wipedown solvent and coating operations and demonstrating compliance with the emission limits in 40 CFR 63.5743(a).
 - (i) The application must include the information listed in the following paragraphs of this section.
 - (aa) An engineering evaluation that compares the emissions using the alternative means to the emissions that would result from using the strategy specified in paragraphs (a) through (e) of Sec. 63.5746. The engineering evaluation may include the results from an emission test that accurately measures the capture efficiency and control device efficiency achieved by the control system and the

composition of the associated coatings so that the emissions comparison can be made.

- (bb) A proposed monitoring protocol that includes operating parameter values to be monitored for compliance and an explanation of how the operating parameter values will be established through a performance test.
 - (cc) Details of appropriate recordkeeping and reporting procedures.
 - (ii) The Administrator will approve the alternative means of limiting emissions if the Administrator determines that HAP emissions will be no greater than if the source uses the procedures described in paragraphs (A) through (E) of this section to demonstrate compliance.
 - (iii) The Administrator's approval may specify operation, maintenance, and monitoring requirements to ensure emissions from the regulated operations are no greater than those that would otherwise result from regulated operations in compliance with this subpart.
- (4) Pursuant to 40 CFR 63.5749, the Permittee shall calculate the organic HAP content of aluminum wipedown solvents as follows:

- (A) Use the following equation to calculate the weighted-average organic HAP content of aluminum wipedown solvents used in the past 12 months.

$$\text{HAP}_{\text{WD}} = \frac{\sum_{j=1}^n (\text{Vol}_j)(D_j)(W_j)}{\sum_{i=1}^m (\text{Vol}_i)(\text{Solids}_i)} \quad (\text{Eq. 1})$$

Where:

HAP_{WD} = weighted-average organic HAP content of aluminum wipedown solvents, kilograms of HAP per liter of total coating solids from aluminum primers, top coats, and clear coats.

n = number of different wipedown solvents used in the past 12 months.

Vol_j = volume of aluminum wipedown solvent j used in the past 12 months, liters.

D_j = density of aluminum wipedown solvent j , kilograms per liter.

W_j = mass fraction of organic HAP in aluminum wipedown solvent j .

m = number of different aluminum surface coatings (primers, top coats, and clear coats) used in the past 12 months.

Vol_i = volume of aluminum primer, top coat, or clear coat i used in the past 12 months, liters.

Solids_i = solids content aluminum primer, top coat, or clear coat i , liter solids per liter of coating.

(B) Compliance is based on a 12-month rolling average. If the weighted-average organic HAP content does not exceed 0.33 kilograms of organic HAP per liter of total coating solids, then the source is in compliance with the emission limit specified in Sec. 63.5743(a)(1).

(5) Pursuant to 40 CFR 63.5752, the Permittee shall calculate the organic HAP content of aluminum recreational boat surface coatings as follows:

(A) Use the following equation to calculate the weighted-average HAP content for all aluminum surface coatings used in the past 12 months.

$$HAP_{WD} = \frac{\sum_{i=1}^m (Vol_i)(D_i)(W_i) + \sum_{k=1}^D (Vol_k)(D_k)(W_k)}{\sum_{i=1}^m (Vol_i)(Solids_i)} \quad (\text{Eq. 1})$$

Where:

HAP_{SC} = weighted-average organic HAP content for all aluminum coating materials, kilograms of organic HAP per liter of coating solids.

m = number of different aluminum primers, top coats, and clear coats used in the past 12 months.

Vol_i = volume of aluminum primer, top coat, or clear coat i used in the past 12 months, liters.

D_i = density of coating i , kilograms per liter.

W_i = mass fraction of organic HAP in coating i , kilograms of organic HAP per kilogram of coating.

p = number of different thinners, activators, and other coating additives used in the past 12 months.

Vol_k = total volume of thinner, activator, or additive k used in the past 12 months, liters.

D_k = density of thinner, activator, or additive k , kilograms per liter.

W_k = mass fraction of organic HAP in thinner, activator, or additive k , kilograms of organic HAP per kilogram of thinner or activator.

$Solids_i$ = solids content of aluminum primer, top coat, or clear coat i , liter solids per liter of coating.

(B) Compliance is based on a 12-month rolling average. If the weighted-average organic HAP content does not exceed 1.22 kilograms of organic HAP per liter of coating solids, then the source is in compliance with the emission limit specified in Sec. 63.5743(a)(2).

(6) Pursuant to 40 CFR 63.5753, the Permittee shall calculate the combined organic HAP content of aluminum wipedown solvents and aluminum recreational boat surface coatings as follows:

(A) Use the following equation to calculate the combined weighted-average organic HAP content of aluminum wipedown solvents and aluminum recreational boat surface coatings.

$$HAP_{Combined} = HAP_{WD} + HAP_{SC}$$

Where:

HAP_{WD} = the weighted-average organic HAP content of aluminum wipedown solvents used in the past 12 months, calculated using equation 1 of Sec. 63.5749.

HAP_{SC} = the weighted average organic HAP content of aluminum recreational boat surface coatings used in the past 12 months, calculated using equation 1 of Sec. 63.5752.

- (B) Compliance is based on a 12-month rolling average. If the combined organic HAP content does not exceed 1.55 kilograms of organic HAP per liter of total coating solids, then the source is in compliance with the emission limit specified in Sec. 63.5743(a)(3).

(7) Spray Gun Cleaning Work Practice Standards

Pursuant to 40 CFR 63.5755, the Permittee must demonstrate compliance with the aluminum coating spray gun cleaning work practice standards by meeting the requirements of paragraph (A) or (B) of this section.

- (A) Demonstrate that solvents used to clean the aluminum coating spray guns contain no more than 5 percent organic HAP by weight by determining organic HAP content with the methods in Sec. 63.5758. Keep records of the organic HAP content determination.

- (B) For solvents containing more than 5 percent organic HAP by weight, comply with the requirements in the following paragraphs of this section.

(i) For an enclosed spray gun cleaner, visually inspect it at least once per month to ensure that covers are in place and the covers have no visible gaps when the cleaner is not in use, and that there are no leaks from hoses or fittings.

(ii) If the source is manually cleaning the gun or spraying solvent into a container that can be closed, visually inspect all solvent containers at least once per month to ensure that the containers have covers and the covers fit with no visible gaps.

(iii) Keep records of the monthly inspections and any repairs that are made to the enclosed gun cleaners or the covers.

- (8) Methods for Determining Hazardous Air Pollutant Content for this subpart are required under 40 CFR 63.5758.

(9) Notifications, Reports, and Records

Pursuant to 40 CFR 63.5761, the Permittee shall:

- (A) Submit all of the notifications in Table 7 to this subpart that apply by the date in the table.

- (B) If the Permittee change any information submitted in any notification, the Permittee must submit the changes in writing to IDEM, OAQ within 15 calendar days after the change.

(10) Reporting Requirements

Pursuant to 40 CFR 63.5764(a), the Permittee must submit each applicable report specified in paragraphs (b) through (e) of Sec. 63.5764. To the extent possible,

each report must be organized according to the operations covered by this subpart and the compliance procedure followed for that operation.

Pursuant to 40 CFR 63.5764(b), unless the IDEM, OAQ has approved a different schedule for submission of reports under Sec. 63.10(a), the Permittee must submit each report by the dates according to the following:

- (A) The first compliance report must cover the period beginning 12 months after the compliance date specified in 40 CFR 63.5695 and ending on June 30 or December 31, whichever date is the first date following the end of the first 12-month period after the compliance date that is specified in 40 CFR 63.5695.
- (B) The first compliance report must be postmarked or delivered no later than 60 calendar days after the end of the compliance reporting period specified in paragraph (A) of this section.
- (C) Each subsequent compliance report must cover the applicable semiannual reporting period from January 1 through June 30 or from July 1 through December 31.
- (D) Each subsequent compliance report must be postmarked or delivered no later than 60 calendar days after the end of the semiannual reporting period.
- (E) For each affected source that is subject to permitting regulations pursuant to 40 CFR part 70 or 71, and if the permitting authority has established dates for submitting semiannual reports pursuant to 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), the Permittee may submit the first and subsequent compliance reports according to the dates the permitting authority has established instead of according to the dates in paragraphs (A) through (D) of this section.

Pursuant to 40 CFR 63.5764(c), the compliance report must contain the following information:

- (A) Company name and address.
- (B) A statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the report.
- (C) The date of the report and the beginning and ending dates of the reporting period.
- (D) A description of any changes in the manufacturing process since the last compliance report.
- (E) A statement or table showing, for each regulated operation, the applicable organic HAP content limit, application equipment requirement, or MACT model point value averaging provision with which you are complying. The statement or table must also show the actual weighted-average organic HAP content or weighted-average MACT model point value (if applicable) for each operation during each of the rolling 12-month averaging periods that end during the reporting period.
- (F) If the source was in compliance with the emission limits and work practice standards during the reporting period, the Permittee must include a

statement to that effect.

- (G) If the source deviated from an emission limit or work practice standard during the reporting period, the Permittee must also include the information listed in 40 CFR 63.5764(c) in the semiannual compliance report.
 - (i) A description of the operation involved in the deviation.
 - (ii) The quantity, organic HAP content, and application method (if relevant) of the materials involved in the deviation.
 - (iii) A description of any corrective action the Permittee took to minimize the deviation and actions the Permittee has taken to prevent it from happening again.
 - (iv) A statement of whether or not the source was in compliance for the 12-month averaging period that ended at the end of the reporting period.

(11) Recordkeeping Requirements

Pursuant to 40 CFR 63.5767, the Permittee must keep the following records, in addition to records specified in individual sections of this subpart.

- (A) A copy of each notification and report that is submitted to comply with this subpart.
- (B) All documentation supporting any notification or report that is submitted.
- (C) If the facility is not controlled by an add-on control device (i.e., the source is complying with organic HAP content limits, application equipment requirements, or MACT model point value averaging provisions), the Permittee keep the records specified in paragraphs (C)(i) through (iii) of this section.
 - (i) The total amounts of open molding production resin, pigmented gel coat, clear gel coat, tooling resin, and tooling gel coat used per month and the weighted-average organic HAP contents for each operation, expressed as weight-percent. For open molding production resin and tooling resin, the Permittee must also record the amounts of each applied by atomized and nonatomized methods.
 - (ii) The total amount of each aluminum coating used per month (including primers, top coats, clear coats, thinners, and activators) and the weighted-average organic HAP content as determined in 40 CFR 63.5752.
 - (iii) The total amount of each aluminum wipedown solvent used per month and the weighted-average organic HAP content as determined in Sec. 63.5749.

Pursuant to 40 CFR 63.5770, the Permittee shall comply with the following:

- (A) Records must be readily available and in a form so they can be easily inspected and reviewed.
 - (B) The Permittee must keep each record for 5 years following the date that each record is generated.
 - (C) Keep each record on site for at least 2 years after the date that each record is generated. The records can be kept offsite for the remaining 3 years.
 - (D) Records may be kept on paper or an alternative media, such as microfilm, computer, computer disks, magnetic tapes, or on microfiche.
- (c) The National Emissions Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 20 and 40 CFR 63) for the Shipbuilding and Ship Repair source category (i.e., 40 CFR 63.780 - 63.788, Subpart II) does not apply to this source since the rule does not include pleasure craft manufacturing (i.e., this source) as an affected source.
- (d) The National Emissions Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 20 and 40 CFR 63) for Marine Tank Vessel Loading Operations source category (i.e., 40 CFR 63.560 - 63.567, Subpart Y) does not apply to this source since the rule does not include pleasure craft manufacturing (i.e., this source) as an affected source.
- (e) This source is not subject to the provisions of 40 CFR 64, Compliance Assurance Monitoring. In order for this rule to apply, a specific emissions unit must meet three criteria for a given pollutant:
- (1) The unit is subject to an emission limitation or standard for the applicable regulated air pollutant;
 - (2) The unit uses a control device to achieve compliance with any such emission limitation or standard, and
 - (3) The unit has potential pre-control device emissions of the applicable regulated air pollutant that are equal or greater than 100 tons per year.
- For this source, no unit meets the three criteria for a given pollutant. Therefore, 40 CFR 64 is not applicable.
- (f) The degreasing operation is not subject to National Emissions Standard for Hazardous Air Pollutants (NESHAP), 40 CFR 63.460, Subpart T. The degreasing operation at the source does not use any halogenated solvent cleaners.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration, PSD)

This source is not subject to the requirements of this rule. This source was constructed prior to the rule applicability date of August 7, 1977 and is not considered a major source because it is not one of the 28 listed source categories, no major modifications were done, and it has the potential to emit after controls of less than 250 tons per year of any criteria pollutant. Since 1977 the source has made the following modification:

Spray Booths #2, #6 and #7, all constructed in 1996, with unrestricted potential emissions of VOC, PM/PM10 of 577.28 and 86.52 tons per year, respectively. Pursuant to T085-6496-00022, issued on October 1, 1998, the source limited VOC usage for each spray booth to 24 tons per 12 consecutive

month period, with compliance determined at the end of each month. The VOC emissions are less than the PSD major modification emissions threshold of 250 tons per year, therefore, the installation of these units was a minor modification to an existing minor source.

For this Title V Renewal permit review, the source shall continue to limit Spray Booths #2, #6 and #7 VOC usages, such that the source wide potential to emit of VOC is limited to less than 250 tons per year.

Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration, PSD) do not apply to this source.

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

This source is not subject to this rule. This rule applies to major sources of hazardous air pollutants (HAP) that were constructed or reconstructed after July 27, 1997. All the facilities at this source were constructed before 1997, therefore, 326 IAC 2-4.1 does not apply.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year) of VOC. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

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 this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) 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.

326 IAC 6-4 (Fugitive Dust Emissions)

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).

State Rule Applicability - Individual Facilities

326 IAC 8-1-6 (General Reduction Requirements)

This rule applies to facilities located anywhere in the state that were constructed on or after January 1, 1980, and which have potential volatile organic compound (VOC) emissions of 25 tons per year or more and are not otherwise regulated by other provisions of article 8. Paint spray booths #1, #3, #4 and #5, and the adhesive application area were constructed before 1980, therefore 326 IAC 8-1-6 does not apply. Paint spray booths #2, #6 and #7 were constructed in 1996 and have potential volatile organic compound (VOC) emissions of 25 tons per year or more, therefore this rule applies. Pursuant to T085-6496-00022, issued on October 1, 1998, VOC emissions from the seven (7) paint spray booths, and adhesive application area are each limited to 24 tons per year. Therefore, the requirements of 326 IAC 8-1-6 do not apply. Hand wiping of cleaning solvents has a potential

emissions of less than 25 tons per year, therefore, the requirements of 326 IAC 8-1-6 do not apply.

326 IAC 8-6 (Organic Solvent Emission Limitations)

Provisions of 326 IAC 8-6 (Organic Solvent Emission Limitations) apply to units commencing operation after October 7, 1974, and prior to January 1, 1980, with potential emissions of 100 tons per year or greater of VOC, and not limited by any other 326 IAC 8 rules.

Paint spray booths #1, #3, #4 and #5, and the adhesive application area were constructed before 1974, and Paint spray booths #2, #6 and #7 were constructed after 1980, therefore 326 IAC 8-6 does not apply.

326 IAC 8-2-9 (Miscellaneous Metal Coating)

The surface coating operations at the source are not subject to this rule. This rule applies to miscellaneous metal coating operations including any industrial category which coats metal parts or products under the Standard Industrial Classification Code of major groups #33, #34, #35, #36, #37, #38 and #39 that are not involved in the surface coating of the exterior of marine vessels. This source belongs to the Standard Industrial Classification Code of group #37, one of the specifically listed groups, however, the surface coating operations at the source are all for coating the exterior of marine vessels. Therefore the requirements of 326 IAC 8-2-9 do not apply.

326 IAC 6-3-2 (Process Operations)

Pursuant to 40 CFR 52 Subpart P, the particulate matter (PM) from the spray booths shall be limited by the following:

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

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

Particulate from the spray booths shall be controlled by air filters. The Permittee shall operate the control devices in accordance with manufacturer's specifications, pursuant to 326 IAC 6-3-2(d).

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

- (a) The Grinding and Machining operations handles less than 100 pounds of material per hour. Pursuant to 326 IAC 6-3-2(e)(2), allowable particulate emissions from these units shall not exceed 0.551 pounds per hour.
- (b) Pursuant to 326 IAC 6-3-1(b)(9), the welding operation is exempt from 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) because less than 625 pounds of wire is consumed per day. However 40 CFR 52 Subpart P applies. Pursuant to 40 CFR 52 Subpart P, the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

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

The cold cleaning operations are not subject to 326 IAC 8-3-2 (Cold Cleaner Operations). This rule applies to cold cleaner type degreasing facilities constructed after January 1, 1980 and before July 1, 1990. The cold cleaning operations at this source were constructed prior to 1980, therefore, 326 IAC 8-3-2 does not apply.

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

The cold cleaning operations are not subject to 326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control). This rule applies to cold cleaner type degreasing facilities constructed after July 1, 1990. The cold cleaning operations at this source were constructed prior to 1990, therefore, 326 IAC

8-3-5 does not apply.

Testing Requirements

Testing of this facility is not required by this permit.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

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

The compliance monitoring requirements applicable to this source are as follows:

1. The seven (7) paint spray booths have applicable compliance monitoring conditions as specified below:
 - (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the air filters, weekly observations shall be made of the overspray from the seven (7) paint spray 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 violation of this permit.
 - (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

These monitoring conditions are necessary because the air filters for paint spray booths must operate properly to ensure compliance with 326 IAC 6-3-2 (Process Operations) and 326 IAC 2-7 (Part 70).

Conclusion

The operation of this aluminum boat manufacturing plant shall be subject to the conditions of the attached proposed Part 70 Permit No. T085-17518-00022.

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

**Addendum to the
Technical Support Document (TSD) for a Part 70 Permit**

Source Background and Description

Source Name:	Godfrey Marine – Syracuse Plant
Source Location:	300 East Chicago Street, Syracuse, Indiana 46567
County:	Kosciusko
SIC Code:	3732
Operation Permit No.:	T085-17518-00022
Permit Reviewer:	Alic Bent/EVP

On March 8, 2004, the Office of Air Quality (OAQ) had a notice published in the Times Union in Warsaw, Indiana, stating that Godfrey Marine – Syracuse Plant had applied for a Part 70 permit renewal for the operation of a stationary aluminum boat manufacturing plant. The notice also stated that OAQ proposed to issue a Part 70 Permit for this operation and provided information on how the public could review the proposed Part 70 Permit 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 Part 70 Permit should be issued as proposed.

Upon further review, the OAQ has decided to make the following change to the Part 70 Permit. Bolded language has been added and the language with a line through it has been deleted.

1. Section C.17 has been revised to include the latest model changes.

C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)]~~[326 IAC 2-7-5(7)]~~[326 IAC 2-7-19(c)]
[326 IAC 2-6]

-
- (a) The Permittee shall submit an ~~annual~~ emission statement certified pursuant to the requirements of 326 IAC 2-6., ~~that must be received by July 1 of each year~~ **This statement must be received in accordance with the compliance schedule specified in 326 IAC 2-6-3** and must comply with the minimum requirements specified in 326 IAC 2-6-4. **The submittal should cover the period identified in 326 IAC 2-6.** The ~~annual~~ emission statement shall meet the following requirements:
- (1) Indicate estimated actual emission of pollutants from the source, in compliance with 326 IAC 2-6 (emission Reporting);
 - (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1 (32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.
- ~~(b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:~~

The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The emission statement does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

- (be) The ~~annual~~ emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

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

PUBLIC COPY

Company Name: **Godfrey Marine - Syracuse Plant**
Address City IN Zip: **300 East Chicago St. Syracuse, IN 46587**
Part 70 No.: **T085-17518-00022**
Reviewer: **Alic Bent/EVP**
Date: **August 17, 2003**

Potential Emissions (uncontrolled):																
Material (as applied)	Density (Lb/Gal)	Weight % Volatile (H2O& Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential ton/yr	lb VOC /gal solids	Transfer Efficiency
Paint Booth #1																
Wash Primer											51.50	1236.06	225.58	7.40	148.55	75.00%
Paint Booth #2																
Wash Primer											51.50	1236.06	225.58	7.40	148.55	75.00%
Paint Booth #3																
Blue Grey Flat											34.54	829.02	151.30	50.76	15.53	75.00%
Olive Drab											35.48	851.46	155.39	47.29	17.64	75.00%
Paint Booth #4																
96 Insignia Blue											40.13	963.03	175.75	27.97	21.04	75.00%
Paint Booth #5																
Low White Elp											37.43	898.31	163.94	45.06	17.16	75.00%
96 Stone Gray											38.85	932.37	170.16	37.66	19.00	75.00%
Paint Booth #6																
Blue Grey Flat											34.54	829.02	151.30	50.76	15.53	75.00%
96 Insignia Blue											40.13	963.03	175.75	27.97	21.04	75.00%
Paint Booth #7																
Hunter Green											40.17	964.11	175.95	28.36	21.33	75.00%
Adhesive Application																
Con-Bond Glue											76.00	1824.08	332.89	19.27	58.97	75.00%
Hand Wipe Operation																
Xylene											2.69	64.65	11.80	0.00		100.00%
V M & P											1.02	24.43	4.46	0.00		100.00%
Total Potential Emissions:											377.47	9059.27	1653.32	236.98		
Potential Emissions (controlled):																
Total Limited Emissions:											Control Efficiency:		Controlled PM tons/yr			
											PM		11.85			
											95.00%					

Methodology:

Usages of Blue Grey Flat and 96 Insignia Blue in Booth #6 are mutually exclusive.
Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids) * Transfer Efficiency
Coating usages are mutually exclusive for each coating booth. Therefore, Total = Worst Coating + Sum of all solvents used
Controlled emission rate = uncontrolled emission rate * (1 - control efficiency)
Usages of coating materials in each paint booth are mutually exclusive.
**** VOC emissions of Booths #1 - #7 and adhesive application are each limited at 24 ton/yr, therefore the requirements of 326 IAC 8-1-6 do not apply.**

**Appendix A: Emission Calculations
HAP Emissions**

PUBLIC COPY

**Company Name: Godfrey Marine - Syracuse Plant
Address City IN Zip: 300 East Chicago Street, Syracuse, IN 46567
Operating Permit: T085-17518-00022
Reviewer: Alic Bent/EVP
Date: August 17, 2003**

Material	Booth ID	Density (Lb/Gal)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Ethy Benzene	Weight % Chromium	Weight % MEK	Weight % MIBK	Weight % Glycol Ether	Weight % Napthalene	Weight % Methanol	Weight % Hexane	Xylene (ton/yr)	Toluene (ton/yr)	Ethyl Benzene (ton/yr)	Chromium (ton/yr)	MEK (ton/yr)	MIBK (ton/yr)	Glycol Ethers (ton/yr)	Napthalene (ton/yr)	Methanol (ton/yr)	Hexane (ton/yr)	Total (ton/yr)
POTENTIAL EMISSIONS																									
Wwash primer	#1														30.97	1.33	12.75	6.68	20.03	13.35	0.00	0.00	6.68	0.00	91.78
Wwash primer	#2														30.97	1.33	12.75	6.68	20.03	13.35	0.00	0.00	6.68	0.00	91.78
Blue grey flat	#3														0.00	0.00	0.00	0.00	0.00	0.00	17.72	0.00	0.00	0.00	17.72
Olive drab	#3														0.00	0.00	0.00	0.00	0.00	0.00	17.23	0.00	0.00	0.00	17.23
96 insignia blue	#4														97.20	0.00	14.38	0.00	0.00	0.00	0.00	10.90	0.00	0.00	122.48
Low White Elip	#5														86.05	0.00	17.21	0.00	0.00	0.00	0.00	0.00	0.00	0.00	103.26
96 Stone Gray	#5														96.24	0.00	16.04	0.00	0.00	0.00	0.00	0.00	0.00	0.00	112.28
Blue grey flat	#6														0.00	0.00	0.00	0.00	0.00	0.00	17.72	0.00	0.00	0.00	17.72
96 insignia blue	#6														97.20	0.00	14.38	0.00	0.00	0.00	0.00	10.90	0.00	0.00	122.48
hunter green	#7														108.73	0.00	14.46	0.00	0.00	0.00	0.00	0.00	0.00	0.00	123.19
Con-Bond Glue	Glue Guns														0.00	38.95	0.00	0.00	0.41	0.00	0.00	0.00	0.00	33.62	72.97
Xylene															11.80	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	11.80
V M & P															0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Potential HAP Emissions															473.11	41.62	85.93	13.35	40.46	26.70	35.43	21.80	13.35	33.62	785.38

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs*emission limitaiions
Usages of coating materials in each paint booth are mutually exclusive.