



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

TO: Interested Parties / Applicant
DATE: March 7, 2006
RE: Harris Kayot, Inc. / 003-17597-00177
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

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

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

The Permittee shall 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.: T003-17597-00177	
Original signed by: Paul Dubenetzky, Assistant Commissioner Office of Air Quality	Issuance Date: March 7, 2006 Expiration Date: March 7, 2011

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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 fiberglass boat manufacturing facility.

Responsible Official:	President
Source Address:	2801 West State Boulevard, Fort Wayne, Indiana 46808
Mailing Address:	2801 West State Boulevard, Fort Wayne, Indiana 46808
General Source Phone Number:	(260) 432-4555
SIC Code:	3732
County Location:	Allen
Source Location Status:	Non-attainment for 8 hour ozone standard 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 Minor Source, Non-attainment NSR Rules 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) Gelcoat application operations consisting of the following emissions units:
 - (1) One (1) HVLP spray gun, identified as G1, used for gelcoat application within an application booth, constructed in 1992, with a maximum throughput capacity of 0.34 boats per hour, using dry filters as control for particulate matter (PM) overspray, and exhausting through Stack E14.
 - (2) One (1) HVLP spray gun, identified as G17, used for gelcoat application within an application booth, installed in 2003, with a maximum throughput capacity of 0.34 boats per hour, using dry filters as control for particulate matter (PM) overspray, and exhausting through Stack E31.
- (b) Molding operations facilities consisting of the following emissions units:
 - (1) Three (3) atomized chop guns, identified as G2, G3 and G4, and a hand lay-up area, constructed in 1992, with a maximum throughput capacity of 0.17 boats per gun per hour, using dry filters as control for particulate matter (PM) overspray, and exhausting through Stacks E12 and E13.
 - (2) Three (3) mechanical, non-atomized chop guns, identified as G18, G19 and G20, used to apply resin, installed in 2003, with a maximum throughput capacity of 0.17 boats per gun per hour, using dry filters as control for particulate matter (PM) overspray, and exhausting to Stacks E32, E33, and E34.

- (c) One (1) fiberglass grinding and smoothing operation consisting of various grinders, sanders and saws, constructed in 1992, with a maximum capacity of 1,075 pounds per hour, using a baghouse as control, and exhausting through Stack E15.
- (d) Woodworking operations including various saws and routers, constructed in 1992, with a maximum capacity of 475 pounds of wood per hour, using a baghouse and a moveable bag filter as control, with the baghouse exhausting through Stack E2 and the moveable bag filter exhausting inside the building.

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

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

- (a) One (1) natural gas fired boiler, identified as B1, constructed in 1992, with a maximum heat input rate of 7.0 million British thermal units per hour, and exhausting through Stack E1. [326 IAC 6-2-4]
- (b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-3-5]
- (c) Welding operations, constructed in 1992, consisting of nine (9) metal inert gas (MIG) stations and four (4) tungsten inert gas (TIG) stations consuming no more than 10.0 pounds of wire per hour, combined, using no controls, and venting through Stacks E3-E6. [326 IAC 6-3-2]
- (d) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]

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);

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] [IC 13-15-3-6(a)]

- (a) This permit, T033-17597-00177, 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 of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal 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.

B.3 Term of Conditions [326 IAC 2-1.1-9.5]

Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

- (a) The condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or
- (b) The emission unit to which the condition pertains permanently ceases operation.

B.4 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.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. One (1) certification may cover multiple forms in (1) one submittal.
- (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
Indianapolis, Indiana 46204-2251

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) 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 PMPs do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) 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
Indianapolis, Indiana 46204-2251

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 shall 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) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, 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] [326 IAC 2-7-10.5]

- (a) All terms and conditions of permits established prior to T033-17597-00177 and issued pursuant to permitting programs approved into the state implementation plan have been either
 - (1) incorporated as originally stated,

- (2) revised under 326 IAC 2-7-10.5, or
- (3) deleted under 326 IAC 2-7-10.5.

- (b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

B.14 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.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

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.16 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 shall 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.17 Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4] [326 IAC 2-7-8(e)]

- (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
Indianapolis, Indiana 46204-2251

- (b) A timely renewal application is one that is:
 - (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (2) 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) 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.

B.18 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
Indianapolis, Indiana 46204-2251

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.19 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.20 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 limitations provided in 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
Indianapolis, Indiana 46204-2251

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, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-7-20(b), (c), or (e). The Permittee shall make 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 emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.21 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.22 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 shall 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 shall 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.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee shall 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
Indianapolis, Indiana 46204-2251

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.24 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, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.25 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314][326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

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 [326 IAC 6-3-2]

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 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
Indianapolis, Indiana 46204-2251

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.7 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
Indianapolis, Indiana 46204-2251

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 shall 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.8 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.9 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 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
Indianapolis, Indiana 46204-2251

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.10 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.11 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

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

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

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

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

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

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

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

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

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

C.12 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 shall comply with the applicable requirements of 40 CFR 68.

C.13 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.

(b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:

- (1) initial inspection and evaluation;
 - (2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or
 - (3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
- (1) monitoring results;
 - (2) review of operation and maintenance procedures and records;
 - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall maintain the following records:
- (1) monitoring data;
 - (2) monitor performance data, if applicable; and
 - (3) corrective actions taken.

C.14 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.15 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) In accordance with the compliance schedule specified in 326 IAC 2-6-3(b)(1), starting in 2007 and every three (3) years thereafter, the Permittee shall submit by July 1 an

emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

- (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
- (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.

The statement shall be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

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

- (b) 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.16 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.17 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 shall 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
Indianapolis, Indiana 46204-2251

- (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, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

C.18 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 shall comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances shall 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 shall 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) Gelcoat application operations consisting of the following emissions units:
- (1) One (1) HVLP spray gun, identified as G1, used for gelcoat application within an application booth, constructed in 1992, with a maximum throughput capacity of 0.34 boats per hour, using dry filters as control for particulate matter (PM) overspray, and exhausting through Stack E14.
 - (2) One (1) HVLP spray gun, identified as G17, used for gelcoat application within an application booth, installed in 2003, with a maximum throughput capacity of 0.34 boats per hour, using dry filters as control for particulate matter (PM) overspray, and exhausting through Stack E31.
- (b) Molding operations facilities consisting of the following emissions units:
- (1) Three (3) atomized chop guns, identified as G2, G3 and G4, and a hand lay-up area, constructed in 1992, with a maximum throughput capacity of 0.17 boats per gun per hour, using dry filters as control for particulate matter (PM) overspray, and exhausting through Stacks E12 and E13.
 - (2) Three (3) mechanical, non-atomized chop guns, identified as G18, G19 and G20, used to apply resin, installed in 2003, with a maximum throughput capacity of 0.17 boats per gun per hour, using dry filters as control for particulate matter (PM) overspray, and exhausting to Stacks E32, E33, and E34.

(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 Term of Applicability

The Conditions in Section E.1 of this permit shall apply to the emissions units described in Section D.1 of this permit beginning on August 23, 2004.

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

Pursuant to Significant Permit Modification 003-17105-00177, issued on April 8, 2003, the emissions of volatile organic compounds from the gelcoat and molding operations (G1, G2, G3, G4, G17, G18, G19, G20) shall not exceed twenty-five (25) tons per twelve (12) consecutive month period, with compliance determined at the end of each month. VOC emissions from the gelcoats and resins used by these facilities shall be calculated by multiplying the usage of each gelcoat and resin by the emission factor provided by the "Unified Emission Factors For Open Molding of Composites, Composites Fabricators Association, April 1999." Compliance with this limit makes 326 IAC 8-1-6 (New Facilities - General Reduction Requirements) not applicable to these gelcoat and molding operations.

D.1.3 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate emissions from the gelcoat and molding operations (G1, G2, G3, G4, G17, G18, G19 and G20) shall be controlled by dry particulate filters, and the Permittee shall operate the control devices in accordance with manufacturer's specifications.

D.1.4 Preventive Maintenance Plan [326 IAC 2-7-4(c)(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of

this permit, is required for these facilities and any control devices.

Compliance Determination Requirements

D.1.5 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

Compliance with the VOC usage limitations contained in Conditions D.1.2 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

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

D.1.6 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the stacks (EU12, EU13, EU14, E31, E32, E33, and E34) while one or more of the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C – Response to Excursions or Exceedances.. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from 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. When there is a noticeable change in overspray emission, or when evidence of overspray emissions is observed at any stack exhaust, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

D.1.7 Visible Emissions Notations

- (a) Weekly visible emission notations of the gelcoat application stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed at the gelcoat application stack exhaust, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

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

D.1.8 Record Keeping Requirements

- (a) To document compliance with Condition D.1.2, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC allowable usage level established in Condition D.1.2.
 - (1) The amount and VOC content of each gelcoat and resin used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used;
 - (2) The total VOC usage for each month; and
 - (3) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.1.6, the Permittee shall maintain a log of weekly overspray observations and monthly inspections.
- (c) To document compliance with Condition D.1.7, the Permittee shall maintain records of weekly visible emission notations of the gelcoat operations' stack exhaust.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.9 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.2 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.

SECTION D.2 FACILITY OPERATION CONDITIONS

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

- (c) One (1) fiberglass grinding and smoothing operation consisting of various grinders, sanders and saws, constructed in 1992, with a maximum capacity of 1,075 pounds per hour, using a baghouse as control, and exhausting through Stack E15.
- (d) Woodworking operations including various saws and routers, constructed in 1992, with a maximum capacity of 475 pounds of wood per hour, using a baghouse and a moveable bag filter as control, with the baghouse exhausting through Stack E2 and the moveable bag filter exhausting inside the building.

(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]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the fiberglass grinding and smoothing operations shall not exceed 2.70 pounds per hour when operating at a process weight rate of 1,075 pounds per hour.

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

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

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

D.2.2 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the woodworking facilities shall not exceed 1.58 pounds per hour when operating at a process weight rate of 480.0 pounds per hour.

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

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

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

D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

D.2.4 Particulate Control

- (a) In order to comply with conditions D.2.1 and D.2.2 the baghouses for particulate control shall be in operation and control emissions from the fiberglass grinding and smoothing operations and the woodworking facilities at all times that the fiberglass grinding and smoothing operations and the woodworking facilities are in operation.

- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

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

D.2.5 Visible Emissions Notations

- (a) Daily visible emission notations of the woodworking baghouse stack exhaust (Stack E2) shall be performed during normal daylight operations when exhausting to the atmosphere.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed at the woodworking baghouse stack exhaust, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

D.2.6 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the woodworking facilities when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

D.2.7 Broken Bag or Failure Detection

In the event that bag failure has been observed:

- (a) For a single compartment baghouse controlling emissions from a process operated continuously, failed units and the associated process shall be shut down immediately until the failed unit have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emissions unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Bag failure can be indicated by a significant drop in the baghouse's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

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

D.2.8 Record Keeping Requirements

- (a) To document compliance with Condition D.2.5, the Permittee shall maintain records of daily visible emission notations of the woodworking baghouse stack exhaust (Stack E2).
- (b) To document compliance with Condition D.2.6, the Permittee shall maintain records of the results of the inspections required under Condition D.2.6 and the dates the vents are redirected.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.3

FACILITY OPERATION CONDITIONS

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

- (a) One (1) natural gas fired boiler, identified as B1, constructed in 1992, with a maximum heat input rate of 7.0 million British thermal units per hour and exhausting through Stack E1. [326 IAC 6-2-4]
- (b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-3-2] [326 IAC 6-3-5]
- (c) Welding operations, constructed in 1992, consisting of nine (9) metal inert gas (MIG) stations and four (4) tungsten inert gas (TIG) stations consuming no more than 10.0 pounds of wire per hour, combined, using no controls, and venting through Stacks E3-E6. [326 IAC 6-3-2]
- (d) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]

(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.3.1 Particulate [326 IAC 6-2-3]

Pursuant to 326 IAC 6-2-3(e) (Particulate Matter Emission Limitations for Sources of Indirect Heating), the PM emissions from the 7.0 million British thermal units per hour boiler shall be limited to 0.6 pounds per MMBtu heat input.

D.3.2 Particulate [326 IAC 6-3]

Pursuant to 326 IAC 6-3-2(e)(2) (Particulate Emission Limitations for Manufacturing Processes), the particulate emission rate from the welding stations shall not exceed 0.551 pounds per hour when operating at a process weight rate of 10.0 pounds per hour.

D.3.3 Degreaser [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), the Permittee of a cold cleaning facility shall:

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

D.3.4 Degreaser [326 IAC 8-3-5]

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- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the Permittee of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:

- (1) Equip the degreaser with a cover. The cover shall be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kilopascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.
 - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kilopascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility shall be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
 - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
 - (4) The solvent spray, if used, shall be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
 - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kilopascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the Permittee of a cold cleaning facility shall ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

SECTION E.1 FACILITY OPERATION CONDITIONS

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

E.1.1 General Provisions Relating to NESHAP [326 IAC 20-48-1] [40 CFR 63, Subpart A]

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

E.1.2 Emissions Standards for Fiberglass Boat Manufacturing Facilities [40 CFR 63.5698] [40 CFR 63.5740]

Pursuant to 40 CFR 63.5698 and 40 CFR 63.5740, the Permittee shall limit HAP emissions from its open molding operations and its carpet and fabric adhesive operations as follows:

- (a) Organic HAP emissions from the five (5) open molding operations specified in paragraph (b) shall not exceed the limit calculated using the following equation:

$$\text{HAP limit} = [46(M_R) + 159 (M_{PG}) + 291(M_{CG}) + 54(M_{TR}) + 214(M_{TG})] \text{ (Eq.1)}$$

Where:

- HAP limit = Total allowable organic HAP (in kilograms) that can be emitted from the open molding operations.
- M_R = Mass of production resin (in megagrams) used in the past 12 months, excluding any exempt materials.
- M_{PG} = Mass of pigmented gel coat (in megagrams) used in the past 12 months, excluding any exempt materials.
- M_{CG} = Mass of clear gel coat (in megagrams) used in the past 12 months, excluding any exempt materials.
- M_{TR} = Mass of tooling resin (in megagrams) used in the past 12 months, excluding any exempt materials.
- M_{TG} = Mass of tooling gel coat (in megagrams) used in the past 12 months, excluding any exempt materials.

- (b) Organic HAP emissions from the following five (5) open molding operations shall be limited to the limit specified in paragraph (a):

- (1) Production resin;
- (2) Pigmented gel coat;
- (3) Clear gel coat;
- (4) Tooling resin; and
- (5) Tooling gel coat.

- (c) Organic HAP emissions from the following materials are exempt from the open molding emission limit specified in paragraph (a):

- (1) Production resins (including skin coat resins) that must meet specifications for use in military vessels or must be approved by the U.S. Coast Guard for use in the construction of lifeboats, rescue boats, and other life-saving appliances approved under 46 CFR subchapter Q or the construction of small passenger vessels regulated by 46 CFR subchapter T. Production resins for which this exemption is used must be applied with nonatomizing (non-spray) resin

application equipment.

- (2) Pigmented, clear, and tooling gel coat used for part or mold repair and touch up. The total gel coat materials included in this exemption must not exceed 1 percent by weight of all gel coat used at your facility on a 12-month rolling-average basis.
 - (3) Pure, 100 percent vinylester resin used for skin coats. This exemption does not apply to blends of vinylester and polyester resins used for skin coats. The total resin materials included in the exemption cannot exceed 5 percent by weight of all resin used at the facility on a 12-month rolling-average basis.
 - (4) Records must be kept to verify amounts of all exempt materials used on a per month basis.
- (d) The Permittee shall use carpet and fabric adhesives that contain no more than 5 percent organic HAP by weight.
- (e) Pursuant to 40 CFR 63.5704, the Permittee shall demonstrate that emissions from the open molding resin and gel coat operations meet the emission limit specified in Condition E.2.2(a) using the emissions averaging methods specified in Condition E.1.8. The Permittee shall use the methods specified in Condition E.1.9 to determine the organic HAP content of resins and gel coats. The Permittee shall complete the calculations described in Condition E.1.8 to show that the organic HAP emissions do not exceed the limit specified in Condition E.1.2(a). Compliance with these requirements shall be based on a 12-month rolling average.

E.1.3 Implementation Plan [40 CFR 63.5707]

Pursuant to 40 CFR 63.5707, the Permittee shall prepare an implementation plan for all open molding operations complying with the emissions averaging compliance option. The implementation plan shall describe the steps the Permittee will take to bring the open molding operations into compliance with 40 CFR 63, Subpart VVVV.

- (a) For each operation included in the emissions average, the implementation plan shall include the following elements:
- (1) A description of each operation included in the average.
 - (2) The maximum organic HAP content of the materials used, the application method used (if any atomized resin application methods are used in the average), and any other methods used to control emissions.
 - (3) Calculations showing that the operations covered by the plan will comply with the open molding emission limit, as specified in Condition E.1.2(a).

E.1.4 Work Practice Standards [40 CFR 63.5731] [40 CFR 63.5734]

Pursuant to 40 CFR 63.5731 and 40 CFR 63.5734, the Permittee shall meet the following work practice standards for its resin and gel coat mixing operations and its resin and gel coat application equipment cleaning operations:

- (a) All resin and gel coat mixing containers with a capacity equal to or greater than 208 liters, including those used for on-site mixing of putties and polyputties, shall have a cover with no visible gaps in place at all times. This work practice standard does not apply when material is being manually added to or removed from a container, or when mixing or pumping equipment is being placed in or removed from a container.
- (b) The Permittee shall demonstrate compliance with the work practice standard in paragraph

(a) of this Condition by visually inspecting all mixing containers subject to this standard at least once per month. The inspection should ensure that all containers have covers with no visible gaps between the cover and the container, or between the cover and equipment passing through the cover.

- (c) For routine flushing of resin and gel coat application equipment (e.g., spray guns, flowcoaters, brushes, rollers, and squeegees), the Permittee shall use a cleaning solvent that contains no more than 5 percent organic HAP by weight. For removing cured resin or gel coat from application equipment, no organic HAP content limit applies.
- (d) The Permittee shall store organic HAP-containing solvents used for removing cured resin or gel coat in containers with covers. The covers shall have no visible gaps and shall be in place at all times, except when equipment to be cleaned is placed in or removed from the container. On containers with a capacity greater than 7.6 liters, the distance from the top of the container to the solvent surface must be no less than 0.75 times the diameter of the container. Containers that store organic HAP-containing solvents used for removing cured resin or gel coat are exempt from the requirements of 40 CFR 63, Subpart T. Cured resin or gel coat means resin or gel coat that has changed from a liquid to a solid.

E.1.5 Work Practice Standards for Fiberglass Boat Manufacturing [326 IAC 20-48-3]

Pursuant to 326 IAC 20-48-3, in addition to the requirements imposed by 40 CFR 63.5731 and 40 CFR 63.5734(b), the following work practice standards shall be implemented:

- (a) Nonatomizing spray equipment shall not be operated at pressures that atomize the material during the application process.
- (b) Solvents sprayed during cleanup and resin changes shall be directed into solvent collection containers.
- (c) For routine flushing of resin and gel coat application equipment, such as spray guns, flowcoaters, brushes, rollers, and squeegees, owners or operators must use a cleaning solvent that contains no hazardous air pollutants (HAPs). However, recycled cleaning solvents that contain less than or equal to five percent (5%) HAP by weight are considered to contain no HAP for the purposes of this subdivision. For removing cured resin or gel coat from application equipment, no organic HAP limit applies.
- (d) Clean-up rags with solvent shall be stored in closed containers.
- (e) Closed containers shall be used for the storage of the following:
 - (1) All production and tooling resins that contain HAPs.
 - (2) All production and tooling gel coats that contain HAPs.
 - (3) Waste resins and gel coats that contain HAPs.
 - (4) Cleaning materials, including waste cleaning materials.
 - (5) Other materials that contain HAPs.
- (f) The covers of the closed containers must have no visible gaps and must be in place at all times, except when equipment is placed in or removed from the container.

E.1.6 Operator Training for Fiberglass Boat Manufacturing [326 IAC 20-48-4]

Pursuant to 326 IAC 20-48-4, all new and existing personnel, including contract personnel, who are involved in resin and gel coat spraying and spray-like applications that could result in excess

emissions if performed improperly, shall be trained according to the following schedule:

- (a) All personnel hired shall be trained within fifteen (15) days of hiring.
- (b) To ensure training goals listed in paragraph (d) are maintained, all personnel shall be given refresher training annually.
- (c) Personnel who have been trained by another owner or operator subject to 326 IAC 20-48 are exempt from requirements of paragraph (a) if written documentation that the employee's training is current is provided to the new employer.
- (d) The lesson plans shall cover, for the initial and refresher training, at a minimum, all of the following topics:
 - (1) Appropriate application techniques.
 - (2) Appropriate equipment cleaning procedures.
 - (3) Appropriate equipment setup and adjustment to minimize material usage and overspray.

Compliance Determination Requirements

E.1.7 Determining Hazardous Air Pollutant (HAP) Content of Materials [40 CFR 63.5758]

Pursuant to 40 CFR 63.5758, the Permittee shall determine the organic HAP content of materials used in its open molding resin and gel coat operations and carpet and fabric adhesive operations using one or more of the following methods:

- (a) Method 311 (appendix A to 40 CFR part 63). The Permittee may use Method 311 for determining the mass fraction of organic HAP. The Permittee shall use the procedures specified in the following two (2) paragraphs when determining organic HAP content by Method 311.
 - (1) Include in the organic HAP total each organic HAP that is measured to be present at 0.1 percent by mass or more for Occupational Safety and Health Administration (OSHA)-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and at 1.0 percent by mass or more for other compounds. Express the mass fraction of each organic HAP measured as a value truncated to four places after the decimal point (for example, 0.1234).
 - (2) Calculate the total organic HAP content in the test material by adding up the individual organic HAP contents and truncating the result to three places after the decimal point (for example, 0.123).
- (b) ASTM D1259-85 (Standard Test Method for Nonvolatile Content of Resins) may be used to measure the mass fraction of volatile matter of resins and gel coats for open molding operations. Use that value as a substitute for mass fraction of organic HAP.
- (c) By providing information on organic HAP content from information supplied by the supplier or manufacturer of the material, such as manufacturer's formulation data, according to the following three (3) paragraphs:
 - (1) Include in the organic HAP total each organic HAP that is present at 0.1 percent by mass or more for OSHA-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and at 1.0 percent by mass or more for other compounds.

- (2) If the organic HAP content is provided by the material supplier or manufacturer as a range, then the Permittee shall use the upper limit of the range for determining compliance. If a separate measurement of the total organic HAP content using the methods specified in paragraphs (a) – (c) above exceeds the upper limit of the range of the total organic HAP content provided by the material supplier or manufacturer, then the Permittee shall use the measured organic HAP content to determine compliance.
- (3) If the organic HAP content is provided as a single value, the Permittee may assume the value is a manufacturing target value and actual organic HAP content may vary from the target value. If a separate measurement of the total organic HAP content using the methods specified in paragraphs (a) – (c) is less than 2 percentage points higher than the value for total organic HAP content provided by the material supplier or manufacturer, then the Permittee shall use the provided value to demonstrate compliance. If the measured total organic HAP content exceeds the provided value by 2 percentage points or more, then the Permittee shall use the measured organic HAP content to determine compliance.
- (d) For solvent blends, the Permittee shall calculate organic HAP content using detailed information available from the supplier or manufacturer of the material or by using the values for organic HAP content listed in Table 5 or 6 of 40 CFR 63, Subpart VVVV.
- (e) The Permittee may use an alternative test method for determining mass fraction of organic HAP by obtaining prior approval by the Administrator, following the procedure set forth in 40 CFR 63.7(f).

E.1.8 Demonstrating Compliance with HAP Emissions Limits [40 CFR 63.5710]

Pursuant to 40 CFR 63.5710, the Permittee shall demonstrate compliance by the following:

- (a) Compliance with the emissions averaging option shall be demonstrated on a 12-month rolling-average basis and shall be determined at the end of every month (12 times per year). The first 12-month rolling-average period begins on August 22, 2004.
- (b) At the end of the twelfth month after August 22, 2004 and at the end of every subsequent month, the Permittee shall use the following equation to demonstrate that the organic HAP emissions from those operations included in the average do not exceed the emission limit specified in Condition E.1.2(a) calculated for the same 12-month period. (Include terms in the equations for the HAP emissions and HAP emission limits only for those operations and materials included in the average.)

$$\text{HAP Emissions} = [(PV_R)(M_R) + (PV_{PG})(M_{PG}) + (PV_{CG})(M_{CG}) + (PV_{TR})(M_{TR}) + (PV_{TG})(M_{TG})]$$

Where:

- HAP emissions = Organic HAP emissions calculated using MACT model point values for each operation included in the average, kilograms.
- PV_R = Weighted-average MACT model point value for production resin used in the past 12 months, kilograms per megagram.
- M_R = Mass of production resin (in megagrams) used in the past 12 months.
- PV_{PG} = Weighted-average MACT model point value for pigmented gel coat used in the past 12 months, kilograms per megagram.
- M_{PG} = Mass of pigmented gel coat used in the past 12 months.

- PV_{CG} = Weighted-average MACT model point value for clear gel coat used in the past 12 months, kilograms per megagram.
- M_{CG} = Mass of clear gel coat (in megagrams) used in the past 12 months.
- PV_{VTR} = Weighted-average MACT model point value for tooling resin used in the past 12 months, kilograms per megagram.
- M_{TR} = Mass of tooling resin (in megagrams) used in the past 12 months.
- PV_{TG} = Weighted-average MACT model point value for tooling gel coat used in the past 12 months, kilograms per megagram.
- M_{TG} = Mass of tooling gel coat (in megagrams) used in the past 12 months.

- (c) At the end of every month, the Permittee shall use the following equation to compute the weighted-average MACT model point value for each open molding resin and gel coat operation included in the average:

$$PV_{OP} = \frac{\sum (M_i P_{Vi})}{\sum (M_i)}$$

Where:

- PV_{OP} = Weighted-average MACT model point value for each open molding operation (PV_R , PV_{PG} , PV_{CG} , PV_{TR} , and PV_{TG}) included in the average, in kilograms of HAP per megagram of material applied.
- M_i = Mass of resin or gel coat i (in megagrams) used within an operation in the past 12 months.
- n = Number of different open molding resins and gel coats used within an operation in the past 12 months.
- P_{Vi} = The MACT model point value for resin or gel coat i used within an operation in the past 12 months, in kilograms of HAP per megagram of material applied.

- (d) The Permittee shall use the following three (3) equations to calculate the MACT model point value (PVi) for each resin and gel coat used in each operation in the past 12 months:

- (1) For production resin and tooling resin operation(s) using atomized spray application, the MACT model point value = $0.014 \times (\text{Resin HAP}\%)^{2.425}$
- (2) For production resin and tooling resin operation(s) using non-atomized spray application, the MACT model point value = $0.014 \times (\text{Resin HAP}\%)^{2.275}$
- (3) For pigmented gel coat, clear gel coat and tooling gel coat using any method of application, the MACT model point value = $0.445 \times (\text{Gel coat HAP}\%)^{1.675}$

- (e) If the organic HAP emissions, as calculated in paragraph (b) of this Condition, are less than the organic HAP limit calculated in Condition E.1.2(a) for the same 12-month period, then the Permittee shall be deemed to be in compliance with the emission limit specified in Condition E.1.2(a) for those operations and materials included in the average.

Pursuant to 40 CFR 63.5737, the Permittee shall demonstrate compliance with the resin and gel coat application equipment cleaning standards in Condition E.1.4 by the following:

- (a) The Permittee shall determine and record the organic HAP content of the cleaning solvents subject to the work practice standards specified in Condition E.1.4 using the methods specified in Condition E.1.7.
- (b) If the Permittee recycles cleaning solvents on site, the Permittee shall use documentation from the solvent manufacturer or supplier or a measurement of the organic HAP content of the cleaning solvent as originally obtained from the solvent supplier for demonstrating compliance, subject to the conditions in Condition E.1.7 for demonstrating compliance with organic HAP content limits.
- (c) At least once per month, the Permittee shall visually inspect any containers holding organic HAP-containing solvents used for removing cured resin and gel coat to ensure that the containers have covers with no visible gaps. The Permittee shall keep records of the monthly inspections and any repairs made to the covers.

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

E.1.10 Record Keeping Requirements

- (a) Pursuant to 326 IAC 20-48-4, and in order to comply with Condition E.1.6, the Permittee shall maintain the following training records on site and available for inspection and review:

- (1) A copy of the current training program.
- (2) A list of all current personnel, by name, that are required to be trained and the dates they were trained and the date of the most recent refresher training.

Records of prior training programs and former personnel are not required to be maintained.

- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

E.1.11 Record Keeping Requirements for Fiberglass Boat Manufacturing Facilities [40 CFR 63.5767]

- (a) Pursuant to 40 CFR 63.5698, the Permittee shall keep records of the amounts of materials exempt from the open molding emissions limits used on a per month basis per Condition E.1.2(c)
- (b) Pursuant to 40 CFR 63.5740, the Permittee shall keep records of the amount and HAP content of all carpet and fabric adhesives used by the source. HAP content shall be calculated using any of the methods specified in Condition E.1.7.
- (c) Pursuant to 40 CFR 63.5707, and in order to demonstrate compliance with Condition E.1.3, the Permittee shall keep records of the implementation plan and any calculations required by the implementation plan. The Permittee shall provide a copy of the implementation plan to the Administrator when asked.
- (d) Pursuant to 40 CFR 63.5731, and in order to demonstrate compliance with Condition E.1.4, the Permittee shall keep records of the monthly visual inspections of the gelcoat and resin mixing containers and any repairs made to the covers.
- (e) Pursuant to 40 CFR 63.5734, and in order to demonstrate compliance with Condition E.1.4 and Condition E.1.9, the Permittee shall keep records of the monthly visual

inspections of the containers used to store solvent used for removing cured resin and gelcoat from the application equipment and any repairs made to the covers.

- (f) Pursuant to 40 CFR 63.5704, and in order to demonstrate compliance with Conditions E.1.2(a) and Condition E.1.8, the Permittee shall keep the following records for each resin and gel coat used in the gelcoat and open molding operations:
- (1) Hazardous Air Pollutant content.
 - (2) Amount of material used per month.
 - (3) Application method used for production resin and tooling resin.
 - (4) Calculations performed to demonstrate compliance based on MACT model point values, as described in 40 CFR 63.5710
- (g) Pursuant to 40 CFR 63.5767, the Permittee shall keep the following records:
- (1) In order to demonstrate compliance with Condition E.1.12, the Permittee shall keep a copy of each notification and report that you submitted to comply with this subpart.
 - (2) All documentation supporting any notification or report that the Permittee submits.
 - (3) A Permittee complying using the MACT model point value averaging provisions must keep records of 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.
 - (4) Records must be readily available and in a form so they can be easily inspected and reviewed.
 - (5) Records must be kept for 5 years following the date that each record is generated.
 - (6) Records must be kept on site for at least 2 years after the date that each record is generated. The Permittee can keep the records offsite for the remaining 3 years.
 - (7) Records may be kept on paper or an alternative media, such as microfilm, computer, computer disks, magnetic tapes, or on microfiche.

E.1.12 Notification Requirements for Fiberglass Boat Manufacturing Facilities [40 CFR 63.5761]

Pursuant to 40 CFR 63.5761, the Permittee shall submit all of the following notifications by the dates specified:

- (a) The Permittee shall submit an initial notification containing the information specified in 40 CFR 63.9(b)(2) no later than 120 calendar days after August 22, 2004.
- (b) The Permittee complying with organic HAP content limits, compliance status application equipment requirements; or MACT model point value averaging provisions shall submit a notification of compliance status as specified in 40 CFR 63.9(h) no later than 30 calendar days after August 22, 2004. The notification of compliance status shall include a copy of the implementation plan as specified in Condition E.1.3.

- (c) If the Permittee changes any information submitted in any notification, the Permittee shall submit the changes in writing to the Administrator within 15 calendar days after the change.

E.1.13 Reporting Requirements for Fiberglass Boat Manufacturing Facilities [40 CFR 63.5764]

Pursuant to 40 CFR 63.5764, the Permittee shall submit the following reports by the dates specified unless the Administrator has approved a different schedule for submission of reports under 40 CFR 63.10(a):

- (a) The first compliance report must cover the period beginning 12 months after August 22, 2004 and ending on December 31, 2005. The first compliance report shall be postmarked or delivered no later than 60 calendar days after the end of the compliance reporting period specified above. Each subsequent compliance report shall cover the applicable semiannual reporting period from January 1 through June 30 and from July 1 through December 31. Each subsequent compliance report shall be postmarked or delivered no later than 60 calendar days after the end of the semiannual reporting period. The compliance report must include 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 MACT model point value averaging provision with which the source is complying. The statement or table shall also show the actual weighted-average MACT model point value for each operation during each of the rolling 12-month averaging periods that end during the reporting period.
 - (6) If the Permittee was in compliance with the emission limits and work practice standards during the reporting period, the report shall include a statement to that effect.
 - (7) If the Permittee deviated from an emission limit or work practice standard during the reporting period, the report shall also include the information listed in the following four (4) paragraphs 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 taken to minimize the deviation and actions the Permittee has taken to prevent it from happening again.
 - (D) A statement of whether or not the facility was in compliance for the 12-month averaging period that ended at the end of the reporting period.
- (b) Pursuant to 40 CFR 63.5707, and in order to demonstrate compliance with Condition E.1.3, the Permittee shall submit the implementation plan to the Administrator with the

notification of compliance status, as specified in Condition E.1.12(b). If the implementation plan is revised, the Permittee shall submit the revised plan with its next semiannual compliance report, as specified in paragraph (a)

- (c) To the extent possible, the Permittee shall organize each report according to the operations covered by 40 CFR 63, Subpart VVVV and the compliance procedure followed for that operation.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Harris Kayot, Inc.
Source Address: 2801 West State Boulevard, Fort Wayne, Indiana 46808
Mailing Address: 2801 West State Boulevard, Fort Wayne, Indiana 46808
Part 70 Permit No.: T003-17597-00177

**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
Indianapolis, Indiana 46204-2251
Phone: 317-233-5674
Fax: 317-233-5967**

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: Harris Kayot, Inc.
Source Address: 2801 West State Boulevard, Fort Wayne, Indiana 46808
Mailing Address: 2801 West State Boulevard, Fort Wayne, Indiana 46808
Part 70 Permit No.: T003-17597-00177

This form consists of 2 pages

Page 1 of 2

- | |
|---|
| <input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12) |
| X The Permittee shall 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 |
| X The Permittee shall 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
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: Harris Kayot, Inc.
Source Address: 2801 West State Boulevard, Fort Wayne, Indiana 46808
Mailing Address: 2801 West State Boulevard, Fort Wayne, Indiana 46808
Part 70 Permit No.: T003-17597-00177
Facility: Gelcoat and molding operations (G1, G2, G3, G4, G17, G18, G19, G20)
Parameter: Volatile Organic Compounds (VOC)
Limit: Twenty-five (25) tons of VOC per twelve (12) consecutive month period, with compliance determined at the end of each month

YEAR:

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

No deviation occurred in this quarter.

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: Harris Kayot, Inc.
Source Address: 2801 West State Boulevard, Fort Wayne, Indiana 46808
Mailing Address: 2801 West State Boulevard, Fort Wayne, Indiana 46808
Part 70 Permit No.: T003-17597-00177

Months: _____ to _____ Year: _____

Page 1 of 2

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

Addendum to the Technical Support Document for a Part 70 Operating Permit (Title V) Renewal

Source Background and Description

Source Name: Harris Kayot, Inc.
Source Location: 2801 West State Boulevard, Fort Wayne, Indiana, 46808
County: Allen
SIC Code: 3732
Operation Permit No.: T003-17597-00177
Permit Reviewer: ERG/ST

On December 29, 2004, the Office of Air Quality (OAQ) had a notice published in the Fort Wayne Journal Gazette, Fort Wayne, Indiana, stating that Harris Kayot, Inc. had applied for a Part 70 Operating Permit (Title V) Renewal to operate a fiberglass boat manufacturing operation with control. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed 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 permit should be issued as proposed.

On September 22, 2005, the source submitted information to IDEM regarding a change in ownership of the source and a change in the responsible official. Additions to the permit are shown in **bold** while deletions are shown in ~~strikeout~~.

Comment 1:

The previous owner was:
Harris Kayot Marine, LLC (dba: Harris Kayot, Inc.)
2801 West state Blvd, Fort Wayne, Indiana 46808

The new owner is:
Brunswick Corporation
200 S. Wacker, Suite 1300, Chicago, Illinois 60606

The previous responsible official was:
Mark Schaefer, Personnel Manager

The new responsible official is:
James M. Poiry, President

Response to Comment 1:

The facility name will remain unchanged as a result of the change in ownership. The following change has been made to the permit:

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 fiberglass boat manufacturing facility.

Responsible Official: ~~Personnel Manager~~ **President**
Source Address: 2801 West State Boulevard, Fort Wayne, Indiana 46808
...

Upon further review, the OAQ has decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted). The Table of Contents has been modified, if applicable, to reflect these changes. When conditions are added, deleted, or moved the remaining conditions have been renumbered to reflect these changes.

1. IDEM's mailing address has been corrected throughout the permit:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, ~~P.O. Box 6015~~
Indianapolis, Indiana 46204-~~2251~~ ~~6-6015~~

2. IDEM has decided to include the following updates to further address and clarify permit conditions.

B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5] [IC 13-15-3-6(a)]

(a) This permit, ~~T033-17597-00177~~, 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 of this permit.

(b) **If IDEM, OAQ, upon receiving a timely and complete renewal 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.**

B.3 Term of Conditions [326 IAC 2-1.1-9.5]

Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

- (a) **The condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or**
- (b) **The emission unit to which the condition pertains permanently ceases operation.**

B.4 14 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5] [326 IAC 2-7-10.5]

(a) All terms and conditions of ~~previous~~ permits **established prior to T033-17597-00177 and** issued pursuant to permitting programs approved into the state implementation plan have been either:

- (1) incorporated as originally stated,

- (2) revised **under 326 IAC 2-7-10.5**, or
- (3) deleted **under 326 IAC 2-7-10.5**.

~~by this permit.~~

- (b) **Provided that all terms and conditions are accurately reflected in this permit, A**all previous registrations and permits are superseded by this **Part 70 operating** permit.

B.4617 Permit Renewal [326 IAC 2-7-3] [326 IAC 2-7-4] [326 IAC 2-7-8(e)]

- (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 46204-2251 6-6015

- (b) ~~Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]~~

~~(1) A timely renewal application is one that is:~~

~~(A) (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and~~

~~(B) (2) 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.~~

3. Indiana was required to incorporate credible evidence provisions into state rules consistent with the SIP call published by U.S. EPA in 1997 (62 FR 8314). Indiana has incorporated the credible evidence provisions in 326 IAC 1-1-6. This rule became effective March 16, 2005; therefore, the condition reflecting this rule is incorporated into the permit as follows:

B.2425 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314] [326 IAC 1-1-6]

~~Notwithstanding the conditions of this permit that state specific methods that may be used to demonstrate compliance with, or a violation of, applicable requirements, any person (including the Permittee) may also use other credible evidence to demonstrate compliance with, or a violation of, any term or condition of this permit. For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.~~

4. IDEM has determined that the Permittee is not required to keep records of all preventive maintenance. However, where the Permittee seeks to demonstrate that an emergency has occurred, the Permittee must provide, upon request, records of preventive maintenance in order to establish that the lack of proper maintenance did not cause or contribute to the deviation. Therefore, IDEM has deleted paragraph (b) of Section B – Preventive Maintenance, and has amended the Section B – Emergency Provisions condition as follows. Some changes shown here reflect changes made for other reasons, and will be documented elsewhere in this addendum.

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]

...

~~(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.~~

~~(e)~~**(b)** 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 PMPs ~~does~~ not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

~~(d)~~**(c)** 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]

...

(e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions.

However, 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.

...

D.1.98 Record Keeping Requirements

...

- (b) To document compliance with Conditions ~~D.1.5~~ and D.1.76, the Permittee shall maintain a log of weekly overspray observations, **and** monthly inspections. ~~and those additional inspections prescribed by the Preventative Maintenance Plan.~~
- (c) To document compliance with Condition D.1.87, the Permittee shall maintain records of weekly visible emission notations of the gelcoat operations' stack exhaust.

...

D.2.8 Record Keeping Requirements

...

- ~~(c) To document compliance with Condition D.2.3, the Permittee shall maintain records of any additional inspections required by the Preventive Maintenance Plan.~~
- (dc) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

5. For clarification purposes, Condition B.20 (formerly B. 19) has been revised as follows:

B.4920 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

(a) ...

- (3) The changes do not result in emissions which exceed the ~~emissions allowable under~~ **limitations provided in** 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 6045
Indianapolis, Indiana ~~46206-6045~~ **46204-2251**

...

- (5) The Permittee maintains records on-site, **on a rolling five (5) year basis**, which document, ~~on a rolling five (5) year basis~~, all such changes and emissions ~~trading trades~~ that are subject to 326 IAC 2-7-20(b), (c), or (e). ~~and makes~~ **The Permittee shall make** 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).

...

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade **emissions** increases and decreases ~~in emissions in~~ at 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).

...

6. The 326 IAC 6-3 revisions that became effective on June 12, 2002 were approved into the State Implementation Plan on September 23, 2005. These rules replace the previous version of 326 IAC 6-3 (Process Operations) that had been part of the SIP; therefore, the requirements of the previous version of 326 IAC 6-3-2 are no long applicable to this source. Condition C.1 has been revised to remove (a) which contained these requirements.

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. This condition is not federally enforceable.~~

.....

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

~~Pursuant to 40 CFR 52, Subpart P, the particulate matter (PM) emissions from the gel coat and molding operations (G1, G2, G3, G4, G17, G18, G19 and G20) 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:~~

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

7. IDEM removed Condition C.6 - Operation of Equipment because the requirements in this condition have been included in Section D.

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.~~

8. Condition C.12 has been removed from the permit as there are no control devices requiring pressure drop monitoring to determine compliance or demonstrate compliance with applicable rules.

C.12 Pressure Gauge Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

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

~~(b) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee~~

~~can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.~~

9. IDEM has reconsidered the requirement to develop and follow a Compliance Response Plan. The Permittee will still be required to take reasonable response steps when a compliance monitoring parameter is determined to be out of range or abnormal. Replacing the requirement to develop and follow a Compliance Response Plan with a requirement to take reasonable response steps will ensure that the control equipment is returned to proper operation as soon as practicable, while still allowing the Permittee the flexibility to respond to situations that were not anticipated. The Section D conditions that refer to this condition have been revised to reflect the new condition title, and the following changes have been made to the Section C condition.

C.4513 Compliance Response Plan – Preparation, Implementation, Records, and Reports Response to Excursions or Exceedances [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.~~
- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.**
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:**
- (1) initial inspection and evaluation;**
- (2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or**
- (3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.**

- (c) **A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:**
 - (1) **monitoring results;**
 - (2) **review of operation and maintenance procedures and records;**
 - (3) **inspection of the control device, associated capture system, and the process.**
- (d) **Failure to take reasonable response steps shall be considered a deviation from the permit.**
- (e) **The Permittee shall maintain the following records:**
 - (1) **monitoring data;**
 - (2) **monitor performance data, if applicable; and**
 - (3) **corrective actions taken.**

...
D.1.76 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the dry filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the stacks (EU12, EU13, EU14, EU31, EU32, EU33, and EU34) while one or more of the booths are in operation. ~~The Compliance Response Plan shall be followed whenever~~ **If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances.** Failure to take response steps in accordance with Section C - ~~Compliance Response Plan - Preparation, Implementation, Records, and Reports~~ **Response to Excursions or Exceedances**, shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. ~~The Compliance Response Plan for these units 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.~~ **When there is a noticeable change in overspray emission, or when evidence of overspray emissions is observed at any stack exhaust, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances.** Failure to take response steps in accordance with Section C - ~~Compliance Response Plan - Preparation, Implementation, Records, and Reports~~ **Response to Excursions or Exceedances**, shall be considered a deviation from this permit.
- (c) ~~Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.~~

D.1.87 Visible Emissions Notations

...

- (e) **If abnormal emissions are observed at the gelcoat application stack exhaust, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances.** ~~The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.~~ Failure to take response steps in accordance with Section C - ~~Compliance Response Plan - Preparation, Implementation, Records, and Reports~~ **Response to Excursions or Exceedances**, shall be considered a deviation from this permit.

.....

D.2.5 Visible Emissions Notations

...

- (e) **If abnormal emissions are observed at the woodworking baghouse stack exhaust, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances.** ~~The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.~~ Failure to take response steps in accordance with Section C - ~~Compliance Response Plan - Preparation, Implementation, Records, and Reports~~ **Response to Excursions or Exceedances**, shall be considered a deviation from this permit.

10. Reporting periods were clarified in Condition C.17 (formerly C.19).

C.1917 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

..

- (e) **Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.**

11. Paragraph (a) of the Broken or Failed Baghouse condition has been deleted. For multi-compartment baghouses, the permit will not specify what actions the Permittee needs to take in response to a broken bag. However, a requirement has been added to Condition D.2.4 requiring the Permittee to notify IDEM if a broken bag is detected and the control device will not be repaired for more than ten (10) days. This notification allows IDEM to take any appropriate actions if the emission unit will continue to operate for a long period of time while the control device is not operating in optimum condition.

D.2.4 Particulate Control

- (a) In order to comply with Conditions D.2.1 and D.2.2, the baghouses for particulate control shall be in operation and control emissions from the fiberglass grinding and smoothing operations and the woodworking facilities at all times that the fiberglass grinding and smoothing operations and the woodworking facilities are in operation.
- (b) **In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.**

D.2.7 Broken or Failed Bag Detection

~~In the event that bag failure has been observed:~~

- ~~(a) For multi compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C—Compliance Response Plan—Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit. If operations continue after bag failure is observed and it will be ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.~~
- ~~(b) (a) For a single compartment baghouses **controlling emissions from a process operated continuously**, if failure is indicated by a significant drop in the baghouse=s pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process ~~will~~ **shall** be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).~~
- ~~(b) For a single compartment baghouse **controlling emissions from a batch process**, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emissions unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).~~

Bag failure can be indicated by a significant drop in the baghouse=s pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

11. The VOC emission limit of less than twenty-five (25) tons per year in Condition D.1.2 applies to all of the gelcoat and resin application emission units at the source, and not just emission units G17, G18, G19 and G20, as indicated in the draft permit. In addition, a typographical error that mis-identified emission units G17, G18, G19 and G20 as "617, 618, 619 and 620 shall be corrected. The permit and Quarterly Report form will be changed as follows:

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

Pursuant to Significant Permit Modification 003-17105-00177, issued on April 8, 2003, the emissions of volatile organic compounds from the gelcoat and molding operations ~~(617, 618, 619, 620)~~ **(G1, G2, G3, G4, G17, G18, G19, G20)** shall not exceed twenty-five (25) tons per twelve (12) consecutive month period, with compliance determined at the end of each month. VOC emissions from the gelcoats and resins used by these facilities shall be calculated by

multiplying the usage of each gelcoat and resin by the emission factor provided by the "Unified Emission Factors For Open Molding of Composites, Composites Fabricators Association, April 1999." Compliance with this limit makes 326 IAC 8-1-6 (New Facilities - General Reduction Requirements) not applicable to these gelcoat and molding operations.

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

Part 70 Quarterly Report

Source Name: Harris Kayot, Inc.
Source Address: 2801 West State Boulevard, Fort Wayne, Indiana 46808
Mailing Address: 2801 West State Boulevard, Fort Wayne, Indiana 46808
Part 70 Permit No.: T003-17597-00177
Facility: Gelcoat and molding operations ~~617, 618, 619, 620~~ (**G1, G2, G3, G4, G17, G18, G19, G20**)
Parameter: Volatile Organic Compounds (VOC)
Limit: Twenty-five (25) tons of VOC per twelve (12) consecutive month period, with compliance determined at the end of each month.

12. The County Attainment Status section in the Technical Support Document is changed to document a Notice published by U.S.EPA in Federal Register Notice 70 FR 943 dated January 5, 2005 regarding PM2.5 attainment status for Indiana Counties. Allen County is determined to be "Attainment or Unclassifiable for PM2.5." U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM 2.5 emissions. Therefore, until the U.S. EPA adopts specific provisions for PSD review for PM2.5 emissions, it has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions. No changes have been made to the TSD because the OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

County Attainment Status

The source is located in Allen County.

Pollutant	Status
PM-10	Attainment
PM2.5	Unclassifiable or Attainment
SO ₂	Attainment
NO ₂	Attainment
1 hour Ozone	Attainment
8 hour Ozone	Basic Non-attainment
CO	Attainment
Lead	Attainment

- (a) **Allen County has been classified as unclassifiable or attainment for PM2.5. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM 2.5 emissions. Therefore, until the U.S.EPA adopts specific provisions for PSD review for PM2.5 emissions, it has**

directed states to regulate PM10 emissions as surrogate for PM2.5 emissions. See the State Rule Applicability for the source section.

- ~~(a)~~(b) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to the ozone standards. Allen County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for nonattainment new source review.

- ~~(b)~~(c) Allen County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

**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:	Harris Kayot, Inc.
Source Location:	2801 West State Boulevard, Fort Wayne, Indiana, 46808
County:	Allen
SIC Code:	3732
Operation Permit No.:	T003-7743-00177
Operation Permit Issuance Date:	September 23, 1998
Permit Renewal No.:	003-17597-00177
Permit Reviewer:	ERG/ST

The Office of Air Quality (OAQ) has reviewed a Part 70 Operating Permit Renewal application from Harris Kayot, Inc. relating to the operation of a fiberglass boat manufacturing operation.

Permitted Emission Units and Pollution Control Equipment

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

- (a) Gelcoat application operations consisting of the following emissions units:
 - (1) One (1) HVLP spray gun, identified as G1, used for gelcoat application within an application booth, constructed in 1992, with a maximum throughput capacity of 0.34 boats per hour, using dry filters as control for particulate matter (PM) overspray, and exhausting through Stack E14.
 - (2) One (1) HVLP spray gun, identified as G17, used for gelcoat application within an application booth, installed in 2003, with a maximum throughput capacity of 0.34 boats per hour, using dry filters as control for particulate matter (PM) overspray, and exhausting through Stack E31.
- (b) Molding operations facilities consisting of the following emissions units:
 - (1) Three (3) atomized chop guns, identified as G2, G3 and G4, and a hand lay-up area, constructed in 1992, with a maximum throughput capacity of 0.17 boats per gun per hour, using dry filters as control for particulate matter (PM) overspray, and exhausting through Stacks E12 and E13.
 - (2) Three (3) mechanical, non-atomized chop guns, identified as G18, G19 and G20, used to apply resin, installed in 2003, with a maximum throughput capacity of 0.17 boats per gun per hour, using dry filters as control for particulate matter (PM) overspray, and exhausting to Stacks E32, E33, and E34.
- (c) One (1) fiberglass grinding and smoothing operation consisting of various grinders, sanders and saws, constructed in 1992, with a maximum capacity of 1,075 pounds per hour, using a baghouse as control, and exhausting through Stack E15.

- (d) Woodworking operations including various saws and routers, constructed in 1992, with a maximum capacity of 475 pounds of wood per hour, using a baghouse and a moveable bag filter as control, with the baghouse exhausting through Stack E2 and the moveable bag filter exhausting inside the building.

Unpermitted Emission Units and Pollution Control Equipment

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

Insignificant Activities

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour, including:
 - (1) One (1) natural gas fired boiler, identified as B1, constructed in 1992, with a maximum heat input rate of 7.0 million British thermal units per hour, and exhausting through Stack E1. [326 IAC 6-2-4].
 - (2) One natural gas fired space heater, identified as E11, with a maximum heat input rate of 2.75 MM Btu/hr and functioning as an air make-up unit.
 - (3) Four (4) natural gas fired space heaters, each with a maximum heat input rate of 500,000 Btu per hour.
 - (4) Seven (7) natural gas fired space heaters, identified as H1-H7, each with a maximum heat input rate of 80,000 British thermal units per hour.
- (b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-3-2] [326 IAC 8-3-5]
- (c) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment, including:
 - (1) Welding operations, constructed in 1992, consisting of nine (9) metal inert gas (MIG) stations and four (4) tungsten inert gas (TIG) stations consuming no more than 10.0 pounds of wire per hour, combined, using no controls, and venting through Stacks E3-E6. [326 IAC 6-3]
- (d) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]
- (e) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs, applied by rolling and high volume, low pressure spraying methods resulting in no airborne particulate matter, using twelve glue guns, identified as G5 through G16, and exhausting to source ventilation.
- (f) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (g) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals measured at 38 degrees C).

- (h) A Pontoon etching process consisting of one (1) caustic sodium hydroxide cleaner dip tank, one (1) nitric acid brightening dip tank, and one (1) alkaline neutralizing tank. PM-10 emissions are less than five (5) pounds per hour and twenty-five (25) pounds per day.

Existing Approvals

The source has been operating under Title V permit T003-7743-00177 (issued on September 23, 1998) and the following permit revisions:

- (a) Minor Permit Modification 003-10574-00177, issued on March 30, 1999; and
- (b) Reopening 003-13137-00177, issued on November 11, 2001; and
- (c) Significant Source Modification 003-16250-00177, issued on March 19, 2003; and
- (d) Significant Permit Modification 003-17105-00177, issued on April 8, 2003.

All conditions from previous approvals were incorporated into this Title V 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 April 21, 2003.

Emission Calculations

See Appendix A of this document for detailed emission calculations (pages 1 through 3).

Potential to Emit of the Source

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

The source was issued a Part 70 Operating Permit on September 23, 1998. The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered enforceable only after issuance of the original Part 70 operating Permit and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/emission unit	Potential to Emit (tons/year)						
	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs*
Gelcoat Application	15.2	15.2	-	Less than 25	-	-	189
Production Resin Application	19.3	19.3	-		-	-	
Cleanup Solvent and Body Filler	-	-	-	18.8	-	-	0.12
Fiberglass Grinding and Smoothing	11.8	11.8	-	-	-	-	-
Woodworking	6.85	6.85	-	-	-	-	-
Boiler and Space Heaters	0.41	0.41	0.03	0.30	4.53	5.39	-
Welding	0.24	0.24	-	-	-	-	0.02
Total PTE	53.7	53.7	0.03	Less than 44.1	4.53	5.39	189

* The potential to emit hazardous air pollutants (HAPs) from the gelcoat and molding activities is 189 tons per year for total combined HAPs. Since the VOC emissions from these units are limited to 25 tons per year, the HAP emissions will be significantly less than the potential to emit stated in this table.

- () The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is equal to or greater than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- () 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 particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD applicability and Non-attainment area NSR.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2001

Pollutant	Actual Emissions (tons/year)
PM	--
PM-10	0
SO ₂	8
VOC	--
CO	--
NO _x	--
HAP (specify)	--

"--" Emissions data not reported

County Attainment Status

The source is located in Allen County.

Pollutant	Status
PM-10	Attainment

Pollutant	Status
SO ₂	Attainment
NO ₂	Attainment
1 hour Ozone	Attainment
8 hour Ozone	Basic Non-attainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to the ozone standards. Allen County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for nonattainment new source review.
- (b) Allen County has been classified as attainment or unclassifiable for all other criteria 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) The requirements of Compliance Assurance Monitoring (CAM) (40 CFR 64) are not included in this permit. Pursuant to 40 CFR 64.2(b)(i), the emission units at this source are regulated under emission limitations or standards (NSPS or NESHAP) proposed by the Administrator after November 15, 1990.
- (b) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in this permit.

The one (1) natural gas-fired boiler (B1) is not subject to the requirements of the New Source Performance Standards for Small Industrial-Commercial-Institutional Steam Generating Units (326 IAC 12, 40 CFR 60, Subpart Dc), because it has a maximum design input capacity less than 10 MMBtu/hr.

- (c) The source is subject to 40 CFR 63, Subpart VVVV as it is a fiberglass boat manufacturing facility and is a major source of HAP (has the potential to emit 10 tons or more per year of a single HAP or 25 tons or more per year of a combination of HAPs). The source is an existing source per the definition in 40 CFR 63.5692. As an existing fiberglass boat manufacturing facility that is a major source of HAPs, the source must comply with the provisions of 40 CFR 63, Subpart VVVV by August 23, 2004.

The Permittee has chosen to comply with the provisions of 40 CFR 63, Subpart VVVV by using the maximum achievable control technology (MACT) model point value averaging (emissions averaging) option, pursuant to 40 CFR 63.5701.

Pursuant to 40 CFR 63.5698, the Permittee must limit HAP emissions from its open molding operations per the following:

- (1) Organic HAP emissions from the following five (5) open molding operations must be limited to the limit specified in paragraph (c):
 - (A) Production resin;
 - (B) Pigmented gel coat;
 - (C) Clear gel coat;
 - (D) Tooling resin; and
 - (E) Tooling gel coat.

- (2) Organic HAP emissions from the following materials are exempt from the open molding emission limit specified in paragraph (3):
 - (A) Production resins (including skin coat resins) that must meet specifications for use in military vessels or must be approved by the U.S. Coast Guard for use in the construction of lifeboats, rescue boats, and other life-saving appliances approved under 46 CFR subchapter Q or the construction of small passenger vessels regulated by 46 CFR subchapter T. Production resins for which this exemption is used must be applied with nonatomizing (non-spray) resin application equipment.
 - (B) Pigmented, clear, and tooling gel coat used for part or mold repair and touch up. The total gel coat materials included in this exemption must not exceed one percent (1%) by weight of all gel coat used at your facility on a 12-month rolling-average basis.
 - (C) Pure, 100 percent vinylester resin used for skin coats. This exemption does not apply to blends of vinylester and polyester resins used for skin coats. The total resin materials included in the exemption cannot exceed 5 percent by weight of all resin used at your facility on a 12-month rolling-average basis.
 - (D) Records must be kept to verify amounts of all exempt materials used on a per month basis.

- (3) The limit on organic HAP emissions from the open molding operations specified in paragraph (1) shall be determined using the following formula (Eq.1):

$$\text{HAP limit} = [46(M_R) + 159 (M_{PG}) + 291(M_{CG}) + 54(M_{TR}) + 214(M_{TG})] \text{ (Eq.1)}$$

where:

- HAP limit = Total allowable organic HAP (in kilograms) that can be emitted from the open molding operations.
- M_R = Mass of production resin (in megagrams) used in the past 12 months, excluding any exempt materials.
- M_{PG} = Mass of pigmented gel coat (in megagrams) used in the past 12 months, excluding any exempt materials.
- M_{CG} = Mass of clear gel coat (in megagrams) used in the past 12 months, excluding any exempt materials.

- M_{TR} = Mass of tooling resin (in megagrams) used in the past 12 months, excluding any exempt materials.
- M_{TG} = Mass of tooling gel coat (in megagrams) used in the past 12 months, excluding any exempt materials.

Pursuant to 40 CFR 63.5704, the Permittee has chosen to comply with the open molding emissions limit by using the emissions averaging option shall demonstrate that emissions from the open molding resin and gel coat operations meet the emission limit specified in 40 CFR 63.5698 using the procedures described in 40 CFR 63.5710. Compliance with this option is based on a 12-month rolling average. In order to demonstrate compliance for those open molding operations and materials using the emissions averaging option, the Permittee shall perform the steps in the following three (3) paragraphs:

- (1) The Permittee shall use the methods specified in 40 CFR 63.5758 to determine the organic HAP content of resins and gel coats.
- (2) The Permittee shall complete the calculations described in 40 CFR 63.5710 to show that the organic HAP emissions do not exceed the limit specified in 40 CFR 63.5698.
- (3) The Permittee shall keep the following records for each resin and gel coat:
 - (A) Hazardous air pollutant content.
 - (B) Amount of material used per month.
 - (C) Application method used for production resin and tooling resin. This record is not required if all production resins and tooling resins are applied with nonatomized technology.
 - (D) Calculations performed to demonstrate compliance based on MACT model point values, as described in 40 CFR 63.5710.

Pursuant to 40 CFR 63.5707, the Permittee will comply with the emissions limitations for its open molding operations by using the emissions averaging option shall prepare an implementation plan. The implementation plan must describe the steps the Permittee will take to bring the open molding operations covered by 40 CFR 63, Subpart VVVV into compliance.

- (1) For each operation included in the emissions average, the implementation plan must include the elements listed in the following three (3) paragraphs:
 - (A) A description of each operation included in the average.
 - (B) The maximum organic HAP content of the materials used, the application method used (if any atomized resin application methods are used in the average), and any other methods used to control emissions.
 - (C) Calculations showing that the operations covered by the plan will comply with the open molding emission limit, as specified in 40 CFR 63.5698.
- (2) The Permittee shall submit the implementation plan to the Administrator with the notification of compliance status, as specified in 40 CFR 63.5761.
- (3) The Permittee shall keep the implementation plan on site and provide it to the Administrator when asked.

- (4) If the implementation plan is revised, the Permittee shall submit the revised plan with its next semiannual compliance report, as specified in 40 CFR 63.5764.

Pursuant to 40 CFR 63.5710, the Permittee will comply with the emissions limitations for its open molding operations by using the emissions averaging option shall demonstrate compliance by the following:

- (1) Compliance using the emissions averaging option is demonstrated on a 12-month rolling-average basis and is determined at the end of every month (12 times per year). The first 12-month rolling-average period begins on August 22, 2004.
- (2) At the end of the twelfth month after August 22, 2004 and at the end of every subsequent month, the Permittee shall use the following equation (Eq.2) to demonstrate that the organic HAP emissions from those operations included in the average do not exceed the emission limit in 40 CFR 63.5698 calculated for the same 12-month period. (Include terms in the equations for the HAP emissions and HAP emission limits only for those operations and materials included in the average.)

$$\text{HAP Emissions} = [(PV_R)(M_R) + (PV_{PG})(M_{PG}) + (PV_{CG})(M_{CG}) + (PV_{TR})(M_{TR}) + (PV_{TG})(M_{TG})] \quad (\text{Eq.2})$$

Where:

- HAP emissions = Organic HAP emissions calculated using MACT model point values for each operation included in the average, kilograms.
- PV_R = Weighted-average MACT model point value for production resin used in the past 12 months, kilograms per megagram.
- M_R = Mass of production resin (in megagrams) used in the past 12 months.
- PV_{PG} = Weighted-average MACT model point value for pigmented gel coat used in the past 12 months, kilograms per megagram.
- M_{PG} = Mass of pigmented gel coat used in the past 12 months.
- PV_{CG} = Weighted-average MACT model point value for clear gel coat used in the past 12 months, kilograms per megagram.
- M_{CG} = Mass of clear gel coat (in megagrams) used in the past 12 months.
- PV_{TR} = Weighted-average MACT model point value for tooling resin used in the past 12 months, kilograms per megagram.
- M_{TR} = Mass of tooling resin (in megagrams) used in the past 12 months.
- PV_{TG} = Weighted-average MACT model point value for tooling gel coat used in the past 12 months, kilograms per megagram.
- M_{TG} = Mass of tooling gel coat (in megagrams) used in the past 12 months.

- (3) At the end of every month, the Permittee shall use the following equation (Eq.3) to compute the weighted-average MACT model point value for each open molding resin and gel coat operation included in the average:

$$PV_{OP} = \sum (M_i PV_i) / \sum (M_i) \quad (\text{Eq.3})$$

Where:

- PV_{OP} = Weighted-average MACT model point value for each open molding operation (PV_R , PV_{PG} , PV_{CG} , PV_{TR} , and PV_{TG}) included in the average, in kilograms of HAP per megagram of material applied.
- M_i = Mass of resin or gel coat i (in megagrams) used within an operation in the past 12 months.
- n = Number of different open molding resins and gel coats used within an operation in the past 12 months.
- PV_i = The MACT model point value for resin or gel coat i used within an operation in the past 12 months, in kilograms of HAP per megagram of material applied.

- (4) The Permittee shall use the following three (3) equations to calculate the MACT model point value (PVi) for each resin and gel coat used in each operation in the past 12 months:
- (A) For production resin and tooling resin operation(s) using atomized spray application, the MACT model point value = $0.014 \times (\text{Resin HAP}\%)^{2.425}$
- (B) For production resin and tooling resin operation(s) using non-atomized spray application, the MACT model point value = $0.014 \times (\text{Resin HAP}\%)^{2.275}$
- (C) For pigmented gel coat, clear gel coat and tooling gel coat using any method of application, the MACT model point value = $0.445 \times (\text{Gel coat HAP}\%)^{1.675}$
- (5) If the organic HAP emissions, as calculated in paragraph (2) of this section, are less than the organic HAP limit calculated in 40 CFR 63.5698 for the same 12-month period, then the Permittee shall be deemed to be in compliance with the emission limit specified in 40 CFR 63.5698 for those operations and materials included in the average.

Pursuant to 40 CFR 63.5731, the Permittee must meet the following work practice standards for its resin and gel coat mixing operations:

- (1) All resin and gel coat mixing containers with a capacity equal to or greater than 208 liters, including those used for on-site mixing of putties and polyputties, must have a cover with no visible gaps in place at all times. This work practice standard does not apply when material is being manually added to or removed from a container, or when mixing or pumping equipment is being placed in or removed from a container.
- (2) The Permittee shall demonstrate compliance with the work practice standard in paragraph (a) of this section by visually inspecting all mixing containers subject to this standard at least once per month. The inspection should ensure that all containers have covers with no visible gaps between the cover and the container, or between the cover and equipment passing through the cover.
- (3) The Permittee shall keep records of which mixing containers are subject to this standard and the results of the inspections, including a description of any repairs or corrective actions taken.

Pursuant to 40 CFR 63.5734, the Permittee must meet the following work practice standards for its resin and gel coat application equipment cleaning operations:

- (1) For routine flushing of resin and gel coat application equipment (e.g., spray guns, flowcoaters, brushes, rollers, and squeegees), the Permittee shall use a cleaning solvent that contains no more than 5 percent organic HAP by weight. For removing cured resin or gel coat from application equipment, no organic HAP content limit applies.
- (2) The Permittee shall store organic HAP-containing solvents used for removing cured resin or gel coat in containers with covers. The covers must have no visible gaps and must be in place at all times, except when equipment to be cleaned is placed in or removed from the container. On containers with a capacity greater than 7.6 liters, the distance from the top of the container to the solvent surface must be no less than 0.75 times the diameter of the container. Containers that store organic HAP-containing solvents used for removing cured resin or gel coat are exempt from the requirements of 40 CFR part 63, subpart T. Cured resin or gel coat means resin or gel coat that has changed from a liquid to a solid.

Pursuant to 40 CFR 63.5737, the Permittee shall demonstrate compliance with the resin and gel coat application equipment cleaning standards by the following:

- (1) The Permittee shall determine and record the organic HAP content of the cleaning solvents subject to the work practice standards specified in Sec. 63.5734 using the methods specified in Sec. 63.5758.
- (2) If the Permittee recycles cleaning solvents on site, the Permittee shall use documentation from the solvent manufacturer or supplier or a measurement of the organic HAP content of the cleaning solvent as originally obtained from the solvent supplier for demonstrating compliance, subject to the conditions in 40 CFR 63.5758 for demonstrating compliance with organic HAP content limits.
- (3) At least once per month, the Permittee shall visually inspect any containers holding organic HAP-containing solvents used for removing cured resin and gel coat to ensure that the containers have covers with no visible gaps. The Permittee shall keep records of the monthly inspections and any repairs made to the covers.

Pursuant to 40 CFR 63.5740, the Permittee must meet the following emissions standards for its carpet and fabric adhesive operations:

- (1) The Permittee shall use carpet and fabric adhesives that contain no more than 5 percent organic HAP by weight.
- (2) The Permittee shall demonstrate compliance with the emission limit by determining and recording the organic HAP content of the carpet and fabric adhesives using the methods in 40 CFR 63.5758.

Pursuant to 40 CFR 63.5758, the Permittee shall determine the organic HAP content of materials used in its open molding resin and gel coat operations and carpet and fabric adhesive operations using one or more of the following methods:

- (1) Method 311 (appendix A to 40 CFR part 63) may be used to determine the mass fraction of organic HAP. Use the procedures specified in the following two (2) paragraphs when determining organic HAP content by Method 311.
 - (A) Include in the organic HAP total each organic HAP that is measured to be present at 0.1 percent by mass or more for Occupational Safety and

Health Administration (OSHA)-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and at 1.0 percent by mass or more for other compounds. Express the mass fraction of each organic HAP measured as a value truncated to four places after the decimal point (for example, 0.1234).

- (B) Calculate the total organic HAP content in the test material by adding up the individual organic HAP contents and truncating the result to three places after the decimal point (for example, 0.123).
- (2) Method 24 (appendix A to 40 CFR Part 60) may be used to determine the mass fraction of non-aqueous volatile matter of aluminum coatings. Use that value as a substitute for mass fraction of organic HAP.
 - (3) ASTM D1259-85 (Standard Test Method for Nonvolatile Content of Resins) may be used to measure the mass fraction of volatile matter of resins and gel coats for open molding operations. Use that value as a substitute for mass fraction of organic HAP.
 - (4) By providing information on organic HAP content from information supplied by the supplier or manufacturer of the material, such as manufacturer's formulation data, according to the following three (3) paragraphs:
 - (A) Include in the organic HAP total each organic HAP that is present at 0.1 percent by mass or more for OSHA-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and at 1.0 percent by mass or more for other compounds.
 - (B) If the organic HAP content is provided by the material supplier or manufacturer as a range, then the Permittee shall use the upper limit of the range for determining compliance. If a separate measurement of the total organic HAP content using the methods specified in paragraphs (1) – (3) above exceeds the upper limit of the range of the total organic HAP content provided by the material supplier or manufacturer, then the Permittee shall use the measured organic HAP content to determine compliance.
 - (C) If the organic HAP content is provided as a single value, the Permittee shall assume the value is a manufacturing target value and actual organic HAP content may vary from the target value. If a separate measurement of the total organic HAP content using the methods specified in paragraphs (1) – (3) is less than 2 percentage points higher than the value for total organic HAP content provided by the material supplier or manufacturer, then the Permittee shall use the provided value to demonstrate compliance. If the measured total organic HAP content exceeds the provided value by 2 percentage points or more, then the Permittee shall use the measured organic HAP content to determine compliance.
 - (5) For solvent blends, the Permittee shall calculate organic HAP content using detailed information available from the supplier or manufacturer of the material or by using the values for organic HAP content listed in Table 5 or 6 of 40 CFR 63, Subpart VVVV.

- (6) The Permittee may use an alternative test method for determining mass fraction of organic HAP by obtaining prior approval by the Administrator, following the procedure set forth in 40 CRR 63.7(f).

Pursuant to 40 CFR 63.5761, the Permittee shall submit all of the following notifications by the dates specified:

- (1) The Permittee shall submit an initial notification containing the information specified in 40 CFR 63.9(b)(2) no later than the dates specified in 40 CFR 63.9(b)(2).
- (2) The Permittee complying with organic HAP content limits, compliance status application equipment requirements; or MACT model point value averaging provisions shall submit a notification of compliance status as specified in 40 CFR 63.9(h) no later than 30 calendar days after August 22, 2004.
- (3) If the Permittee changes any information submitted in any notification, the Permittee shall submit the changes in writing to the Administrator within 15 calendar days after the change.

Pursuant to 40 CFR 63.5764, the Permittee shall submit the following reports by the dates specified unless the Administrator has approved a different schedule for submission of reports under 40 CFR 63.10(a):

- (1) For existing sources using the emissions averaging option, the first compliance report must cover the period beginning 12 months after August 22, 2004 and ending on December 31, 2005. The first compliance report must be postmarked or delivered no later than 60 calendar days after the end of the compliance reporting period specified above. Each subsequent compliance report must cover the applicable semiannual reporting period from January 1 through June 30 and from July 1 through December 31. Each subsequent compliance report must be postmarked or delivered no later than 60 calendar days after the end of the semiannual reporting period. 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 shall submit the first and subsequent compliance reports according to the dates the permitting authority has established instead of according to the dates specified in this paragraph. The compliance report must include the information specified in the following seven (7) paragraphs as follows:
 - (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 MACT model point value averaging provision with which the source is complying. The statement or table must also show the actual weighted-average MACT model point value for each operation during

each of the rolling 12-month averaging periods that end during the reporting period.

- (F) If the Permittee was in compliance with the emission limits and work practice standards during the reporting period, the Permittee shall include a statement to that effect.
- (G) If the Permittee deviated from an emission limit or work practice standard during the reporting period, the Permittee shall also include the information listed in the following four (4) paragraphs 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 taken to minimize the deviation and actions you have taken to prevent it from happening again.
 - (iv) A statement of whether or not the facility was in compliance for the 12-month averaging period that ended at the end of the reporting period.
- (2) To the extent possible, the Permittee shall organize each report according to the operations covered by 40 CFR 63, Subpart VVVV and the compliance procedure followed for that operation.

Pursuant to 40 CFR 63.5767, the Permittee shall keep the following records:

- (1) A copy of each notification and report submitted by the Permittee to comply with this subpart.
- (2) All documentation supporting any notification or report submitted by the Permittee.
- (3) A Permittee complying using the MACT model point value averaging provisions must keep records of 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.
- (4) Records must be readily available and in a form that can be easily inspected and reviewed.
- (5) Records must be kept for 5 years following the date that each record is generated.
- (6) Records must be kept on site for at least 2 years after the date that each record is generated. The Permittee may keep the records offsite for the remaining 3 years.

- (7) Records may be kept on paper or an alternative media, such as microfilm, computer, computer disks, magnetic tapes, or on microfiche.
- (d) The requirements of the National Emission Standards for Halogenated Solvent Cleaning (326 IAC 20-6, 40 CFR 63, Subpart T) are not included in this permit for the degreasing operations. The cold solvent cleaning machine does not use a solvent containing methylene chloride, perchlorethylene, trichlorethylene, 1,1,1-trichlorethane, carbon tetrachloride, chloroform or any combination of these halogenated HAP solvents in a total concentration greater than five percent (5%) by weight as a cleaning or drying agent.
- (e) The 7.0 MMBtu/hr natural gas-fired boiler (B-1) is subject to the requirements of the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63, Subpart DDDDD. The 7.0 MMBtu/hr natural gas-fired boiler (B-1) is part of the affected source for the small gaseous fuel subcategory, as defined by 40 CFR 63.7575, because it has a rated capacity of less than or equal to 10 million British thermal units per hour heat input. However, pursuant to 40 CFR 63.7506(c), there are no applicable requirements from 40 CFR 63, Subpart DDDDD and 40 CFR 63, Subpart A for the affected source for the small gaseous fuel subcategory.

State Rule Applicability – Entire Source

326 IAC 2-1.1-5 (Nonattainment New Source Review)

This source is located in Allen County. Allen County was designated as a nonattainment area for the 8-hour ozone standard on June 15, 2004. The potential to emit of VOC of this source, after limits, is less than 100 tons per year. Therefore, this source is a minor source for VOC under Nonattainment NSR.

326 IAC 2-2 (Prevention of Significant Deterioration) and 326 IAC 2-3 (Emission Offset)

This source was constructed in 1992. This source is not in one of the 28 source categories. There are no applicable New Source Performance Standards that were in effect on August 7, 1980. Fugitive emissions are not counted towards the total emissions of the source for purposes of determining PSD applicability.

At the time of construction, the potential to emit of PM, PM10, VOC and all other criteria pollutants from the source was less than 250 tons per year. The source was a minor PSD source at the time of construction.

Under SSM 003-16250-00177, issued March 19, 2003, the source was permitted to add a new gelcoat and molding line. The PTE for PM, PM10, VOC and all other criteria pollutants for these modifications was less than 250 tons per year. After these modifications, the PTE for VOC for this source was greater than 250 tons per year. However, in SSM 003-16250-00177, the source agreed to limit VOC emissions from this modification to less than 25 tons per year (see discussion of 326 IAC 8-1-6 below). These modifications did not trigger PSD review. The limits on VOC emissions accepted by the source in SSM 003-16250-00177 also kept total VOC emissions from the entire source from exceeding 250 tons per year after the modifications.

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

Although this source is a major source of HAP emissions it is not subject to 326 IAC 2-4.1 because it was constructed prior to the July 27, 1997 applicability date.

326 IAC 2-6 (Emission Reporting)

Since this source is required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program, this source is subject to 326 IAC 2-6 (Emission Reporting). In accordance with the compliance schedule in 326 IAC 2-6-3, an emission statement must be submitted triennially by

July 1 beginning in 2007 and every 3 years after. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

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 Exemptions), opacity shall meet the following, unless otherwise stated in the permit:

- () 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.
- () 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 20-25 (Emissions from Reinforced Plastics Composites Fabricating Emission Units)

The gelcoat and molding facilities are subject to 326 IAC 20-25 because:

1. They have a potential to emit 10 tons per year of any hazardous air pollutant (HAP) or 25 tons per year of any combination of HAPs and that manufacture;
2. They manufacture fiberglass boats; and
3. They have actual emissions of styrene equal to or greater than 3 tons per year.

Pursuant to 326 IAC 20-25-1(c), the gel coat and molding facilities will be subject to the requirements of 326 IAC 20-25 until August 23, 2004 (the date that the source shall be in compliance with 326 IAC 20-48).

Pursuant to 326 IAC 20-25-3, the gelcoat and molding facilities shall comply with the following conditions:

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

Watercraft Products	HAP Monomer Content (Weight Percent)
<u>Resin Manual or Mechanical Application</u>	
Production-Specialty Products	48*
Production-Noncorrosion Resistant Unfilled	35*
Production-Noncorrosion Resistant Filled (35% by weight)	38
Shrinkage Controlled	52
Tooling	43*
<u>Gel Coat Application</u>	
Production - Pigmented and Base Coat Gel Coat	34
Clear Production and Tooling	48

*Categories that must use mechanical nonatomized application technology or manual application as stated in subsection (c).

Compliance with these HAP monomer content limits shall be demonstrated on a monthly basis. If all of the resins and gel coats used during a month meet the specified HAP monomer content limits, then maintaining records of content is sufficient for demonstrating compliance with the HAP monomer content limits.

Compliance with the limitations contained in this condition may be demonstrated using monthly emission averaging within each resin or gel coat application category listed in subsection (b) by the use of resins or gel coats with HAP monomer contents lower than the limits specified, and/or additional emission reduction techniques approved by IDEM, OAQ.

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

For Averaging within a category:

$$3 \text{ Em}_A \leq 3 (M_R * E_a)$$

Where:

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

*Units: mass = tons
emission factor = lbs of monomer per ton of resin or gel coat
emissions = lbs of monomer*

Note: Fillers may not be included when averaging.

Where:

- M_R = Total monthly mass of material within each category (tons).
- E_a = Emission factor for each material based on allowable monomer content and allowable application method for each category (lbs of monomer per ton of resin or gel coat applied).
- Em_A = Actual monthly emissions from all materials used within a category based on material specific emission factors, emission reduction techniques and emission controls (lbs of monomer).

(b) The following categories of materials in subsection (a) shall be applied using mechanical nonatomized application technology or manual application:

- (1) Production noncorrosion resistant, unfilled resins from all sources.

- (2) Production, specialty product resins from all sources.
- (3) Tooling resins used in the manufacture of watercraft.
- (4) Production resin used for Class I flame and smoke products.

Nonatomized application equipment means the devices where resin or gel coat material does any of the following:

- (1) Flows from the applicator, in a steady state in a observable coherent flow, without droplets, for a minimum distance of three (3) inches from the applicator orifices such as flow coaters, flow choppers, and fluid impingement equipment.
- (2) Is mechanically dispensed within or on to a paint roller applicator such as pressure fed rollers.
- (3) Is deposited on fiber reinforcement moving through a resin or gel coat bath such as resin impregnators.

Nonatomized spray application technology includes flow coaters, flow choppers, pressure-fed rollers, fluid impingement, or other non-spray applications of a design and specifications approved by IDEM, OAQ.

Filled resins are resins containing greater than or equal to thirty-five percent (35%) by weight inert filler material, such as silica micro-spheres or micro-balloons, added to alter the density or other physical properties of the resin. The term "inert filler" does not include pigments.

- (c) Unless specified in subsection (b), gel coat application and mechanical application of resins shall be by any of the following spray technologies:
 - (1) Nonatomized application technology.
 - (2) Air-assisted airless.
 - (3) Airless.
 - (4) High volume, low pressure (HVLP).
 - (5) Equivalent emission reduction technologies to subdivisions (2) through (4).
- (d) The following cleaning operation standards for resin and gel coat application equipment shall apply:
 - (1) For routine flushing of resin and gel coat application equipment such as spray guns, flow coaters, brushes, rollers, and squeegees, a cleaning solvent shall contain no HAPs. This emission standard does not apply to solvents used for removing cured resin or gel coat from application equipment.
 - (2) A source must store HAP containing solvents used for removing cured resin or gel coat in containers with covers. The covers must have no visible gaps and must be in place at all times, except when equipment is placed in or removed from the container.

- (3) Recycled cleaning solvents that contain less than or equal to five percent (5%) HAP by weight are considered to contain no HAP for the purposes of this subsection.

Pursuant to 326 IAC 20-25-4, the following work practice standards shall be implemented:

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

Pursuant to 326 IAC 20-25-8, all new and existing personnel, including contract personnel, who are involved in resin and gel coat spraying and spray-like applications (for example those applications that could result in excess emissions if performed improperly) shall be trained according to the following schedule:

- (a) All new personnel shall be trained within fifteen (15) days of hiring.
- (b) All personnel hired before March 7, 2001 shall be trained or evaluated by a supervisor within thirty (30) days of the start of operation.
- (c) To ensure training goals listed in subsection (b) are maintained, all personnel shall be given refresher training annually.
- (d) Personnel who have been trained by another owner or operator subject to 326 IAC 20-25 are exempt from subdivision (a) if written documentation that the employee's training is current is provided by the new employer.
- (e) If the result of an evaluation show that training is needed, such training shall occur within fifteen (15) days of the evaluation.

- (f) The lesson plans shall cover, for the initial and refresher training, at a minimum, all of the following topics:
 - (1) Appropriate application techniques.
 - (2) Appropriate equipment cleaning procedures.
 - (3) Appropriate equipment setup and adjustment to minimize material usage and overspray.
- (g) The Permittee shall maintain the following training records on site and available for inspection and review:
 - (1) A copy of the current training program.
 - (2) A list of current personnel, by name, that are required to be trained and the dates they were trained and the date of the most recent refresher training. Records of prior training programs and former personnel are not required to be maintained.

These conditions imposed by 326 IAC 20-25 will remain in effect until August 23, 2004.

326 IAC 20-48 (Emission Standards for Hazardous Air Pollutants for Boat Manufacturing)

This source is subject to 326 IAC 20-48 because: it is a fiberglass boat manufacturing facility subject to 40 CFR 63, Subpart VVVV, it is a major source of hazardous air pollutants and it is an existing major source (as defined in 40 CFR 63.5683) as of August 22, 2001.

Pursuant to 326 IAC 20-48, an existing source that is a major source on or before August 22, 2001 shall comply with the requirements of 326 IAC 20-48 by August 23, 2004.

Pursuant to 326 IAC 20-48-2, in addition to alternative organic HAP content requirements for open molding resin operations contained in Table 2 to Subpart VVVV, 40 CFR 63, the alternative HAP content requirements for gel coat operations are as follows:

Gel Coat Application		
For this operation	And this application method	You must not exceed this weighted-average percent organic HAP content (weight percent) requirement
Pigmented gel coat operations	Atomized (spray)	33 percent
Clear gel coat operations	Atomized (spray)	48 percent
Tooling gel coat operations	Atomized (spray)	40 percent
Pigmented gel coat operations	Nonatomized (nonspray)	40 percent
Clear gel coat operations	Nonatomized (nonspray)	55 percent
Tooling gel coat operations	Nonatomized (nonspray)	54 percent

Pursuant to 326 IAC 20-48-3, in addition to the requirements imposed by 40 CFR 63.5731 and 40 CFR 63.5734(b), the following work practice standards are required:

- (a) Nonatomizing spray equipment shall not be operated at pressures that atomize the material during the application process.
- (b) Solvents sprayed during cleanup and resin changes shall be directed into solvent collection containers.
- (c) For routine flushing of resin and gel coat application equipment, such as spray guns, flowcoaters, brushes, rollers, and squeegees, owners or operators must use a cleaning solvent that contains no hazardous air pollutants (HAPs). However, recycled cleaning

solvents that contain less than or equal to five percent (5%) HAP by weight are considered to contain no HAP for the purposes of this subdivision. For removing cured resin or gel coat from application equipment, no organic HAP limit applies.

- (d) Clean-up rags with solvent shall be stored in closed containers.
- (e) Closed containers shall be used for the storage of the following:
 - (1) All production and tooling resins that contain HAPs.
 - (2) All production and tooling gel coats that contain HAPs.
 - (3) Waste resins and gel coats that contain HAPs.
 - (4) Cleaning materials, including waste cleaning materials.
 - (5) Other materials that contain HAPs.
- (f) The covers of the closed containers must have no visible gaps and must be in place at all times, except when equipment is placed in or removed from the container.

Pursuant to 326 IAC 20-48-4:

- (a) Each owner or operator shall train all new and existing personnel, including contract personnel, who are involved in resin and gel coat spraying and applications that could result in excess emissions if performed improperly according to the following schedule:
 - (1) All personnel hired shall be trained within fifteen (15) days of hiring.
 - (2) To ensure training goals listed in subsection (b) are maintained, all personnel shall be given refresher training annually.
 - (3) Personnel who have been trained by another owner or operator subject to this rule are exempt from subdivision (1) if written documentation that the employee's training is current is provided to the new employer.
- (b) The lesson plans shall cover, for the initial and refresher training, at a minimum, all of the following topics:
 - (1) Appropriate application techniques.
 - (2) Appropriate equipment cleaning procedures.
 - (3) Appropriate equipment setup and adjustment to minimize material usage and overspray.
- (c) The owner or operator shall maintain the following training records on site and available for inspection and review:
 - (1) A copy of the current training program.
 - (2) A list of all current personnel, by name, that are required to be trained and the dates they were trained and the date of the most recent refresher training.
- (d) Records of prior training programs and former personnel are not required to be maintained.

State Rule Applicability – Gelcoat and Molding Operations

326 IAC 6-3-2 (Process Operations)

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

Pursuant to SSM 003-16250-00177 issued on March 19, 2003 and 40 CFR 52 Subpart P, the particulate matter (PM) from the gelcoat and molding operations (G1, G2, G3, G4, G17, G18, G19 and G20) 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:

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

Under 326 IAC 6-3 (as revised), particulate from the gelcoat and molding operations shall be controlled by a dry particulate filter or an equivalent control device and the Permittee shall operate the control device in accordance with manufacturer's specifications.

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

The source added new gelcoat and resin guns (G17, G18, G19 and G20) to its existing gelcoat and molding line in 2003. The combined gelcoat and molding operations are considered as one facility under 326 IAC 8-1-6 and have the potential to emit greater than 25 tons per year of VOC. The expanded gelcoat and molding facility would be subject to 326 IAC 8-1-6 because the units are constructed after the applicability date of January 1, 1980 and have potential emissions of volatile organic compounds (VOC) that are greater than twenty-five (25) tons per year. However, Harris Kayot, Inc. agreed to limit the combined VOC emissions from these facilities to less than twenty-five (25) tons per twelve (12) consecutive month period. This limit was included in Significant Permit Modification 003-17105-00177 in Condition D.1.1.

Pursuant to Significant Permit Modification 003-17105-00177, issued April 8, 2003, the emissions of volatile organic compounds from the gelcoat and molding operations (617, 618, 619, 620) shall not exceed twenty-five (25) tons per twelve (12) consecutive month period, with compliance determined at the end of each month. VOC emissions from the gelcoats and resins shall be calculated by multiplying the usage of each gelcoat and resin by the emission factor provided by the "Unified Emission Factors for Open Molding of Composites," Composites Fabricators Association, April 1999. Compliance with this limit makes 326 IAC 8-1-6 (New Facilities - General Reduction Requirements) not applicable.

State Rule Applicability – 7 MMBtu Natural Gas-fired Boiler

326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating)

This boiler is an indirect heating facility and was constructed after September 21, 1983. The boiler has a heat input capacity less than 10 MMBtu/hr. Pursuant to 326 IAC 6-2-4(a), the particulate emissions from the 7.00 MMBtu/hr boiler shall not exceed 0.6 pounds of particulate matter per MMBtu heat input.

State Rule Applicability – Fiberglass Grinding and Smoothing and Woodworking Operations

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

- (a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the woodworking facilities shall not exceed 1.58 pounds per hour when operating at a process weight rate of 475.0 pounds per hour.
- (b) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the fiberglass grinding and smoothing operations shall not exceed 2.70 pounds per hour when operating at a process weight rate of 1075 pounds per hour.

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

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

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

The baghouses shall be in operation at all times the fiberglass grinding and smoothing operations and woodworking operations are in operation, in order to comply with this limit.

State Rule Applicability – Welding Operations

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

Pursuant to 326 IAC 6-3-2(e)(2) (Particulate Emission Limitations for Manufacturing Processes) the particulate from the welding operations shall not exceed 0.551 pounds per hour when working at a process rate of 10 pounds of wire per hour.

State Rule Applicability – Degreasing Facilities

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

This cold cleaner degreasing facility is located in Allen County, was constructed after January 1, 1980 and is used to perform organic solvent degreasing operations. Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), the Permittee of a cold cleaning facility shall:

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

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

This cold cleaner degreasing facility is located in Allen County, was constructed after January 1, 1990, is used to perform organic solvent degreasing operations and does not have a remote solvent reservoir. Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the Permittee of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:

- (a) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (1) the solvent volatility is greater than two (2) kilo Pascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
 - (2) the solvent is agitated; or
 - (3) the solvent is heated.
- (b) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kilo Pascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
- (c) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
- (d) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
- (e) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kilo Pascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
 - (1) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (2) A water cover when solvent used is insoluble in, and heavier than, water.
 - (3) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:

- (a) Close the cover whenever articles are not being handled in the degreaser.
- (b) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
- (c) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

Testing Requirements

- (a) The Permittee is not required to perform compliance stack tests for the woodworking baghouses. Visible emission notations, quarterly inspection, bag failure and overspray inspection requirements have been added consistent with current compliance monitoring requirements for Title V woodworking sources. These monitoring requirements should be sufficient to ensure compliance with the particulate matter emission limitations.
- (b) The Permittee is not required to perform compliance stack tests on the gelcoat and molding operations for VOC emissions because there are no VOC control devices in operation. The Permittee is required by conditions of this permit to keep records of the VOC and HAP used in these facilities.
- (c) However, IDEM may require compliance testing if necessary to determine if these facilities are in compliance.

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 in Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for 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 gelcoat and molding operations have applicable compliance monitoring conditions as specified below:
 - (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the dry filters. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
 - (b) Monthly inspections shall be performed of the coating emissions from the 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 deviation from this permit. Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

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

These monitoring conditions are necessary because the dry filters used to control particulate emissions from these emission units because they must operate properly to ensure compliance with 40 CFR 52, Subpart P, 326 IAC 6-3 (Particulate Emissions from Manufacturing Processes) and 326 IAC 2-7 (Part 70).

2. The woodworking operation has applicable compliance monitoring conditions as specified below:
- (a) Daily visible emissions notations of the woodworking operation exhaust stack E2 shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emissions is observed.
- (b) An inspection shall be performed each calendar quarter of all bags controlling the woodworking operations. All defective bags shall be replaced.

These monitoring conditions for the baghouses controlling the woodworking operations are necessary to ensure compliance with 326 IAC 6-3 (Particulate Emissions for Manufacturing Processes) and 326 IAC 2-7 (Part 70).

Conclusion

The operation of this fiberglass boat manufacturing operation shall be subject to the conditions of this Part 70 permit 003-19597-00177.

Appendix A: Emissions Calculations
Particulate Emissions from Gel Coat, Resin Molding,
Grinding and Woodworking Operations

Company Name: Harris Kayot, Inc.
Address City IN Zip: 2801 West State Boulevard, Ft. Wayne, Indiana 46808
Title V: 003-17597-00177
Reviewer: ERG/ST
Date: December 15, 2003

Gelcoat and Production Resin Application (Spray and Flocoat)					
Emissions Unit ID	Maximum Annual Throughput (Solids) (tons/yr)	Transfer Efficiency (%)	Control Efficiency (%)	PM/PM10 Before Controls (tons/yr)	PM/PM10 After Controls (tons/yr)
G1: Gelcoat Application	152	75	80	37.9	7.58
G17: Gelcoat Application	152	75	80	37.9	7.58
G2, G3, and G4: Atomized Chop Guns	967	90	80	96.7	19.3
G18, G19, and G20: Flocoater Applicators	967	100	-	0	0

Assume transfer efficiency of 80% for HVLP spray guns, 90% for chop guns and 100% for flocoater guns.

Maximum Annual Throughput (Solids) (tons/yr) = Annual Usage (lbs/yr) x 2 (expansion) x % solids x 8760 (hrs/yr) / 2040 (actual work hrs/yr) x 1/2000 (tons/lb).

PTE Before Controls (tons/yr) = Throughput (tons/yr) x (1-Transfer Efficiency).

PTE After Controls (tons/yr) = Throughput (tons/yr) x (1 - Transfer Efficiency) x (1 - Control Efficiency).

Fiberglass Grinding and Smoothing Operations					
baghouse					
Emissions Unit ID	Maximum Annual Throughput (Boats/yr)	PM/PM10 Emissions (lbs/boat)	Capture/Control Efficiency (%)	PM/PM10 Before Controls (tons/yr)	PM/PM10 After Controls (tons/yr)
Fiberglass Grinding and Smoothing	5957	2	80	5.96	1.19

Boat Production Rate is limited by Gelcoat spray rate of .34 + .34 = .68 boats per hour.

Source records show that 0.5 pounds of dust is collected from the baghouse and floor sweepings for each boat produced. To create a margin of error, calculations assume 2 pounds of particulate is sanded/grinded off of each boat hull.

PTE After Controls (tons/yr) = Max. Throughput (boats/yr) x Emissions (lb/boat) x (1 - Capture/Control Efficiency) x 1/2000 (ton/lb)

Woodworking Operations					
Woodworking operations are controlled by two (2) small portable baghouses, having respective airflows of 2100 acfm and 1900 acfm, and respective outlet grain loading rates of 0.053 gr/cf and 0.089 gr/cf.					
Emissions Unit ID	Outlet Grain Loading (gr/cf)		Capture/Control Efficiency (%)	PM/PM10 Before Controls (tons/yr)	PM/PM10 After Controls (tons/yr)
2100 acfm baghouse	0.053		80	4.18	0.84
1900 acfm baghouse	0.089		80	6.35	1.27

Assume combined capture and control efficiency of 80%

PTE (tons/yr) = Air Flow (acfm) x Outlet grain loading (gr/cf) x 60 (min/hr) x 1/7000 (lb/gr) x 8760 (hr/yr) x 1/2000 (ton/lb)

Welding Operations		
Welding operations consist of nine (9) MIG and four (4) TIG welding stations using a combined total of 10 lbs of wire per hour.		
	Manganese (tons/yr)	PM10 (tons/yr)
PM10 Default Emission Factor = 0.0055 lb PM10/lb electrode		
Manganese Default Emission Factor = 0.0005 lb PM10/lb electrode	0.022	0.24

Emissions (tons/yr) = Wire consumed (lbs/hr) x 8760 (hrs/yr) x Emission Factor (lb/lb wire) x 1/2000 (ton/lb)

Total Particulate Emissions	
PM/PM10 Before Controls (tons/yr)	PM/PM10 After Controls (tons/yr)
189	38.0

Appendix A: Emissions Calculations
HAP and VOC Emissions from
Gel Coat and Resin Molding Operations
(Emission Units G1, G2, G3, G4, G17, G18, G19, and G20)

Appendix A TSD Page 2 of 3

Company Name: Harris Kayot, Inc.
Address City IN Zip: 2801 West State Boulevard, Ft. Wayne, Indiana 46808
Title V: 003-17597-00177
Reviewer: ERG/ST
Date: December 15, 2003

Material	Annual Purchases ^a (lbs/yr)	Annual Purchases w/ 2x Expansion (lbs/yr)	Maximum Annual Usage ^b (tons/yr)	HAP (wt. %)	VOC ^c (wt. %)	MEK (wt. %)	Solids (tons/yr)	Emission Factor ^d (lbs/ton material)	Styrene Emissions (tons/yr)	Methyl Methacrylate Emissions (tons/yr)	Methacrylic Acid Emissions (tons/yr)	MEK Emissions (tons/yr)	VOC Emissions ^e (tons/yr)
Poly-Bond B 39 R, S or W, pumpable putty	53,500	107,000	229.74	24.40%	24.400%		173.7	52.20	6.00				6.00
STYPOL LSPC-3200 Production Resin	534,000	1,068,000	2293.06	33.51%	33.507%		1524.7	72.50	83.12				83.12
SprayCore 2000-OS 2nd Skin Cote	58,300	116,600	250.35	40.00%	40.000%		150.2	93.00	11.64				11.64
LUPEROX DHD-9, Clear Catalyst	3,300	6,600	14.17	2.00%	98.00%	2.00%	0.0					0.28	14.17
LUPEROX DHD-9, Red Catalyst	8,900	17,800	38.22	2.00%	98.00%	2.00%	0.0					0.76	38.22
STYPOL 073-5620 SkinCoat, VE-1 Cook	36,200	72,400	155.45	34.87%	44.873%		85.7	76.70	5.96				5.96
				10.00%				150.00					11.66
Polar White, 963WH206 (Gelcoat)	83,900	167,800	360.28	19.36%	27.859%		259.9	172.70	31.11				31.11
				8.50%				127.50					22.97
Navy, 954LH220 (Gelcoat)	5,200	10,400	22.33	36.47%	40.950%		13.2	366.50	4.09				4.09
				4.48%				67.50					0.75
Green, 954GH161 (Gelcoat)	5,300	10,600	22.76	36.12%	40.550%		13.5	358.10	4.07		0.77		4.07
				4.44%				67.50					0.77
Yellow, 954YH224 (Gelcoat)	1,100	2,200	4.72	35.29%	39.483%		2.9	342.00	0.81				0.81
				4.19%				63.00					0.149
Flame Red, 954RH126 (Gelcoat)	1,200	2,400	5.15	36.25%	40.571%		3.1	360.20	0.93				0.93
				4.33%				64.50					0.166
Pitch, 954BA025LG (Gelcoat)	250	500	1.07	38.18%	43.003%		0.6	402.00	0.22				0.22
				4.82%				72.00					0.039
Pebble (Taupe), 954NA846 (Gelcoat)	1,200	2,400	5.15	36.43%	40.982%		3.0	364.40	0.94		0.174		0.94
				4.55%				67.50					0.174
Orange, 954YH220 (Gelcoat)	1,200	2,400	5.15	35.75%	40.130%		3.1	352.00	0.91				0.91
				4.38%				66.00					0.170
Cabernet, 954MH030 (Gelcoat)	1,500	3,000	6.44	36.12%	40.554%		3.8	358.10	1.15		0.21		1.15
				4.44%				66.00					0.21
71000, body filler, for lamination	2,000	4,000	8.59	27.00%	27.000%		6.3	57.80	0.25				0.25
Acetone Clean-up Solvent	8,776	17,552	37.69		100.0%								37.69
Potential to Emit (tons/year)									151.20	25.4	11.7	1.05	278.33
									Total PTE for HAPs (tons/year)		189.3		
									Total PTE for VOCs (tons/year)		278		

Production Resin Solids (tons/yr) = 1934.3

Gelcoat Solids (tons/yr) = 303.1

All Solids (tons/yr) = 2244

^a Annual Usage based on 2001 usage records and 2040 hours of operation.

^b Maximum annual usage is based on 8760 hours of operation per year and doubling of material usage.

^c All HAPs are also VOCs. Assume that all HAP emissions (after UEF Emission Factor) are also VOC emissions. Styrene, methyl methacrylate, methacrylic acid and MEK are VOCs.

^d Emission Factors (in lbs/ton) for Styrene and Methyl Methacrylate for resin and gelcoat operations taken from the CFA Unified Emission Factors (July 23, 2001)

Assume all MEK and VOC in catalyst and cleaning solvents volatilizes to atmosphere.

Methodology:

Maximum Annual Usage (tons/yr) = Annual Usage (lbs/yr) x 2 (expansion) x 8760 (hrs/yr) / 2040 (actual work hrs/yr) x 1/2000 (tons/lb).

PTE (tons/yr) for gelcoats, resins and body filler = Max. Usage (tons/yr) x Emission Factor (lb/ton material) x 0.0005 (tons/lb)

PTE (tons/yr) for catalysts and cleanup solvents = Max. Usage (tons/yr) x % weight HAP (or % weight VOC).

Total PTE (tons/yr) for VOCs = PTE for HAPs + PTE for non-HAP VOCs.

Production resin Solids and Gelcoat Solids (tns/yr) = (1-%VOC) x Maximum Annual Usage (tons/yr)

Appendix A: Emission Calculations
Combustion Emissions - Natural Gas-Fired Boilers and Space Heaters

Company Name: Harris Kayot, Inc.
Address City IN Zip: 2801 West State Boulevard, Ft. Wayne, Indiana 46808
Title V: 003-17597-00177
Reviewer: ERG/ST
Date: December 15, 2003

			Pollutant							
			PM*	PM10*	SO ₂	NO _x **	CO	VOC	HAPs	
Natural Gas-Fired Boiler and Space Heaters (Insignificant Activity)			Emission Factor	7.6	7.6	0.6	100.0	84.0	5.5	0.09
			(units)	(lbs/MMCF)	(lbs/MMCF)	(lbs/MMCF)	(lbs/MMCF)	(lbs/MMCF)	(lbs/MMCF)	(lbs/MMCF)
			Potential To Emit (tons/yr)							
Emission Unit(s)	Max. Potential Throughput (MMCF/yr)	Heat Input Capacity (MMBtu/hr)	Emission Unit	PM	PM10	SO ₂	NO _x	CO	VOC	HAPs
B1	61.3	7.00	B1	0.23	0.23	0.018	3.07	2.58	0.17	0.003
H8	24.1	2.75	H8	0.09	0.09	0.007	1.20	1.01	0.07	0.001
H9 - H12	17.5	2.00	H9 - H12	0.07	0.07	0.005	0.88	0.74	0.05	0.001
H1 - H7	4.91	0.56	H1 - H7	0.02	0.02	0.001	0.25	0.21	0.01	0.000
Totals				0.41	0.41	0.032	5.39	4.53	0.30	0.005

*PM and PM10 emission factor are for condensable and filterable PM and PM10 combined.

**Emission Factors for NO_x: Uncontrolled = 100, Low NO_x Burner = 50, Low NO_x Burners/Flue gas recirculation = 32

Emission Factors from AP-42, Chapter 1.4 - Natural Gas Combustion, Tables 1.4-1, 1.4-2, 1.4-3 and 1.4-4. SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03. (AP-42 Supplement D 7/98)

All Emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF - 1,000,000 Cubic Feet of Gas

1000 Btu per cubic foot of natural gas

Methodology

Max. Potential Throughput (MMCF/yr) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x (1 MMCF/1,000,000 cubic feet gas) x (1 cubic feet gas/ 1,000 Btu) x 1,000,000 Btu/MMBtu.

PTE for PM, PM10, NO_x, SO₂, CO, VOC and HAPs (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Total HAP emissions from the natural gas boiler and space heaters are negligible.