



Joseph E. Kernan  
Governor

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Commissioner

August 12, 2004

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TO: Interested Parties / Applicant  
RE: Rinker Boat Company / 085-17904-00031  
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

**Rinker Boat Company, Inc.  
300 West Chicago Street  
Syracuse, Indiana 46567**

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

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

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

Operation Permit No.: T085-17904-00031	
Issued by: Original signed by Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: August 12, 2004  Expiration Date: August 12, 2009

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## SECTION A SOURCE SUMMARY

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

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

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The Permittee owns and operates a stationary fiberglass boat building and repairing operation.

Responsible Official:	Controller, John Peat
Source Address:	300 West Chicago Street, Syracuse, Indiana 46567
Mailing Address:	300 West Chicago Street, Syracuse, Indiana 46567
General Source Phone Number:	(574) 457-5731
SIC Code:	3732
County Location:	Kosciusko
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD; Major Source, Section 112 of the Clean Air Act

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

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

- (a) one (1) fiberglass lay-up operation (P2-3), constructed in 1993, located in Plant 2, utilizing a spray lay-up gel coat application system and a resin spray lay-up or flow coating application system, producing a maximum of 1.5 fiberglass boats per hour, with dry filters for particulate matter overspray control, and exhausting through four (4) stacks (S2-1, S2-2, S2-3, and S2-4);
- (b) one (1) fiberglass lay-up operation (P3-2), constructed in 1989, located in Plant 3, utilizing a spray lay-up gel coat application system and a resin spray lay-up or flow coating application system, producing a maximum of 1.0 fiberglass boats per hour, with dry filters for particulate matter overspray control, and exhausting through seven (7) stacks (S3/3X-1, S3/3X-2, S3/3X-3, S3/3X-4, S3/3X-5, S3/3X-6 and S3/3X-7);
- (c) one (1) fiberglass lay-up operation (P3X-2), constructed in 2001, located in the Plant 3 expansion, utilizing a flow coating and/or High Volume Low Pressure (HVLP) spray lay-up gel coat application system and a resin flow coating application system, producing a maximum of 8.125 fiberglass boat feet per hour, with dry filters for particulate matter overspray control, and exhausting through seven (7) stacks (S3/3X-1, S3/3X-2, S3/3X-3, S3/3X-4, S3/3X-5, S3/3X-6 and S3/3X-7);
- (d) one (1) upholstery glue application area (P1-1), constructed in 1993, located in Plant 1, using a High Volume Low Pressure (HVLP) spray application system, coating a maximum of 1.0 set of boat parts per hour;
- (e) one (1) assembly glue application area (P2-1), constructed in 1993, located in Plant 2, using a High Volume Low Pressure (HVLP) spray application system, coating a maximum of 1.5 sets of boat parts per hour;

- (f) one (1) assembly glue application area (P3-1), constructed in 1989, located in Plant 3, using a High Volume Low Pressure (HVLP) spray application system, coating a maximum of 1.0 set of boat parts per hour;
- (g) one (1) assembly glue application area (P3X-1), constructed in 2001, located in the Plant 3 expansion, using a High Volume Low Pressure (HVLP) spray application system, coating a maximum of 8.125 boat feet per hour;
- (h) one (1) woodworking operation (P1-2), constructed in 1993, located in Plant 1, consisting of three (3) routers, three (3) table saws, three (3) chop saws, and one (1) belt sander, processing a maximum of 1100 pounds of plywood per hour, with a cyclone for particulate matter control, and exhausting through one (1) stack (S1-2).

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

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

- (a) Emissions from research and development activities conducted under close supervision of technically trained personnel and are not engaged in the manufacture of products for sale, exchange for commercial profit, or distribution, except in a de minimis manner, and the primary purpose of which is to test more efficient production processes, test methods for preventing or reducing adverse environmental impacts, or conduct research and development into new processes and products:  
  
mold making and repair operations, identified as tooling operations, using two (2) gel coat/resin application booths located in Plant 4. Tooling resin is applied via flowcoating. Tooling gel coat is applied using air-assisted airless spray guns. [326 IAC 20-25-3]
- (b) Other categories with emissions below significant thresholds:
  - (1) one (1) trim-off operation consisting of hand-held grinders in Plant 3 and the Plant 3 expansion for trimming/grinding boats after removed from molds with a maximum process weight rate of 2,575 pounds per hour, with two (2) baghouses (BH-1 and BH-2) for control of PM and PM10 emissions, exhausting inside the building. [326 IAC 6-3-2]
  - (2) one (1) trim-off operation consisting of hand-held grinders in Plant 2 for trimming/grinding boats after removed from molds with a maximum process weight rate of 2,575 pounds per hour, with one (1) baghouse (Plant 2 Baghouse) for control of PM and PM10 emissions, exhausting inside the building. [326 IAC 6-3-2]

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

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

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

## SECTION B GENERAL CONDITIONS

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

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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]

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

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

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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 the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

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

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

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

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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)]

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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)]

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- (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)]

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

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

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

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

and

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

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

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

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

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in

inventory for quick replacement.

- (b) The Permittee shall implement the PMPs, including any required record keeping as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

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

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

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or  
Telephone Number: 317-233-5674 (ask for Compliance Section), or  
Telephone Number: 574-245-4870, or toll free 1-800-753-5519 (Northern Regional Office)  
Facsimile Number: 317-233-5967, or  
Facsimile Number: 574-245-4877 (Northern Regional Office)

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

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

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

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

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

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

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

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

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- (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 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]**

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

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

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

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

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

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

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

**B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]**

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

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

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

Request for renewal shall be submitted to:

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

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

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

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:
- Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015
- Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

- (d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

**B.18 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12(b)(2)]**

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- (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 U.S. EPA.

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

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- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:
  - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
  - (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
  - (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
  - (4) The Permittee notifies the:  
  
Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015  
  
and  
  
United States Environmental Protection Agency, Region V  
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590  
  
in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and
  - (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.  
  
Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-7-20(b)(1), (c)(1), and (e)(2).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:
- (1) A brief description of the change within the source;
  - (2) The date on which the change will occur;
  - (3) Any change in emissions; and
  - (4) Any permit term or condition that is no longer applicable as a result of the change.

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

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

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

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

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

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

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

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

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:
- Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015
- The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

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

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

B.24 Credible Evidence [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [62 FR 8314]

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.

## SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

#### C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds Per Hour [40 CFR 52, Subpart P] [326 IAC 6-3-2]

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

#### 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.

#### C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

#### C.6 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.7 Stack Height [326 IAC 1-7]

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The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

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

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

All required notifications shall be submitted to:

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

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

- (e) Procedures for Asbestos Emission Control  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

- (f) **Demolition and Renovation**  
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Accredited Asbestos Inspector**  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

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

#### **C.9 Performance Testing [326 IAC 3-6]**

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- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

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

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

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

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

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

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

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

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Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented upon 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 upon permit issuance, the Permittee may extend the compliance

schedule related to the equipment for ninety (90) days provided the Permittee notifies:

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

in writing, prior to permit issuance, with full justification of the reasons for the inability to meet this date.

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

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

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

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Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60, Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

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

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

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

- (a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on December 12, 1996.
- (b) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level.  
[326 IAC 1-5-3]

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

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

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

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- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and 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 of control device be shut down, and it will be 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 status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.
  - (4) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
  - (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.
  - (3) An automatic measurement was taken when the process was not operating.
  - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when, in accordance with Section D, response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

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

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

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

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

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

- (a) 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 must be submitted to:

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

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

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

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

**C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]**

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- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) Reporting periods are based on calendar years.

**Stratospheric Ozone Protection**

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

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

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

## SECTION D.1 FACILITY OPERATION CONDITIONS

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

- (a) one (1) fiberglass lay-up operation (P2-3), constructed in 1993, located in Plant 2, utilizing a spray lay-up gel coat application system and a resin spray lay-up or flow coating application system, producing a maximum of 1.5 fiberglass boats per hour, with dry filters for particulate matter overspray control, and exhausting through four (4) stacks (S2-1, S2-2, S2-3, and S2-4);
- (b) one (1) fiberglass lay-up operation (P3-2), constructed in 1989, located in Plant 3, utilizing a spray lay-up gel coat application system and a resin spray lay-up or flow coating application system, producing a maximum of 1.0 fiberglass boats per hour, with dry filters for particulate matter overspray control, and exhausting through seven (7) stacks (S3/3X-1, S3/3X-2, S3/3X-3, S3/3X-4, S3/3X-5, S3/3X-6 and S3/3X-7);
- (c) one (1) fiberglass lay-up operation (P3X-2), constructed in 2001, located in the Plant 3 expansion, utilizing a flow coating and/or High Volume Low Pressure (HVLP) spray lay-up gel coat application system and a resin flow coating application system, producing a maximum of 8.125 fiberglass boat feet per hour, with dry filters for particulate matter overspray control, and exhausting through seven (7) stacks (S3/3X-1, S3/3X-2, S3/3X-3, S3/3X-4, S3/3X-5, S3/3X-6 and S3/3X-7);
- (d) one (1) upholstery glue application area (P1-1), constructed in 1993, located in Plant 1, using a High Volume Low Pressure (HVLP) spray application system, coating a maximum of 1.0 set of boat parts per hour;
- (e) one (1) assembly glue application area (P2-1), constructed in 1993, located in Plant 2, using a High Volume Low Pressure (HVLP) spray application system, coating a maximum of 1.5 sets of boat parts per hour;
- (f) one (1) assembly glue application area (P3-1), constructed in 1989, located in Plant 3, using a High Volume Low Pressure (HVLP) spray application system, coating a maximum of 1.0 set of boat parts per hour;
- (g) one (1) assembly glue application area (P3X-1), constructed in 2001, located in the Plant 3 expansion, using a High Volume Low Pressure (HVLP) spray application system, coating a maximum of 8.125 boat feet per hour; and
- (h) mold making and repair operations, identified as tooling operations, using two (2) gel coat/resin application booths located in Plant 4. Tooling resin is applied via flowcoating. Tooling gel coat is applied using air-assisted airless spray guns.

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

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

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

- (a) Pursuant to T085-7516-00031, issued on June 3, 1999, Best Available Control Technology (BACT) for the two (2) fiberglass lay-up operations (P2-3 and P3-2) is to comply with the following work practice: solvent used to clean up chopper guns and other tools shall be discharged into containers, and these containers shall be kept covered at all times other than when solvent is discharged into them.

- (b) Pursuant to 326 IAC 8-1-6, the fiberglass lay-up operation (P3X-2), including the gel coat booth, is subject to the requirements of 326 IAC 8-1-6, which requires that the Best Available Control Technology (BACT) be used to control VOC emissions. Compliance with 326 IAC 2-4.1-1 (MACT) has been determined to be sufficient as BACT. Pursuant to 326 IAC 8-1-6 (Best Available Control Technology), the VOC emissions from the fiberglass lay-up operation (P3X-2), including the gel coat booth, shall be limited to less than 100 tons per consecutive twelve (12) month period.

D.1.2 New Source Toxics Control [326 IAC 2-4.1-1]

Pursuant to the MACT determination under 326 IAC 2-4.1-1, operating conditions for the fiberglass lay-up operation (P3X-2), including the gel coat booth, shall be the following:

- (a) Use of resins and gel coats shall be limited such that the potential to emit (PTE) volatile organic HAP from resins and gel coats only shall be less than 100 tons per consecutive twelve (12) month period. Compliance with this limit shall be determined based upon the following criteria:
- (1) Monthly usage by weight, monomer content, method of application, and other emission reduction techniques for each gel coat and resin shall be recorded. Volatile organic HAP emissions shall be calculated by multiplying the usage of each gel coat and resin by the emission factor that is appropriate for the monomer content, method of application, and other emission reduction techniques for each gel coat and resin, and summing the emissions for all gel coats and resins. Emission factors shall be obtained from the reference approved by IDEM, OAQ.
- (2) Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA-approved form, emission factors shall be taken from the following reference approved by IDEM, OAQ: "CFA Emission Models for the Reinforced Plastics Industries," Composites Fabricators Association, February 28, 1998, and shall not exceed 32.3% styrene emitted per weight of gel coat applied and 17.7% styrene emitted per weight of resin applied. For the purposes of these emission calculations, monomer in resins and gel coats that is not styrene shall be considered as styrene on an equivalent weight basis.
- (b) Resins and gel coats used, including filled resins and tooling resins and gel coats, shall be limited to maximum monomer contents of 35 percent (35%) by weight for resins, 37 percent (37%) by weight for gel coats or their equivalent on an emissions mass basis. Monomer contents shall be calculated on a neat basis, i.e., excluding any filler. Compliance with these monomer content limits shall be demonstrated on a monthly basis.

The use of resins with monomer contents lower than 35%, gel coats with monomer contents lower than 37%, and/or additional emission reduction techniques approved by IDEM, OAQ, may be used to offset the use of resins with monomer contents higher than 35%, and/or gel coats with monomer contents higher than 37%. Examples of other techniques include, but are not limited to, lower monomer content resins and gel coats, closed molding, vapor suppression, vacuum bagging, controlled spraying, or installing a control device with an overall reduction efficiency of 95%. This is allowed to meet the monomer content limits for resins and gel coats, and shall be calculated on an equivalent emissions mass basis as shown below:

(Emissions from >35% resin or >37% gel coat) - (Emissions from 35% resin or 37% gel coat)  $\leq$  (Emissions from 35% resin or 37% gel coat) - (Emissions from <35% resin, <37% gel coat, and or other emission reduction techniques).

Where: Emissions, lb or ton = M (mass of resin or gel coat used, lb or ton) \* EF

(Monomer emission factor for resin or gel cat used, %):

EF, Monomer emission factor = emission factor, expressed as % styrene emitted per weight of resin applied, which is indicated by the monomer content, method of application, and other emission reduction techniques for each gel coat and resin used.

- (c) Flow coaters, a type of non-spray application technology of a design and specifications to be approved by IDEM, OAQ, shall be used to apply 100% of all neat resins used within 1 year of commencement of operation.

If, after 1 year of operation it is not possible to apply a portion of neat resins with flow coaters, equivalent emissions reductions must be obtained via use of other techniques, such as those listed in paragraph (b) above, elsewhere in the process.

- (d) Optimized spray techniques according to a manner approved by IDEM shall be used for gel coats and filled resins (where fillers are required for corrosion or fire retardant purposes) at all times. Optimized spray techniques include, but are not limited to, the use of airless, air-assisted airless, high volume low pressure (HVLP), or other spray applicators demonstrated to the satisfaction of IDEM, OAQ, to be equivalent to the spray applicators listed above.

HVLP spray is the technology used to apply material to substrate by means of coating application equipment that operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

- (e) The listed work practices shall be followed:
- (1) To the extent possible, a non-VOC, non-HAP solvent shall be used for cleanup.
  - (2) Cleanup solvent containers used to transport solvent from drums to work stations shall be closed containers having soft gasketed spring-loaded closures.
  - (3) Cleanup rags saturated with solvent shall be stored, transported, and disposed of in containers that are closed tightly.
  - (4) The spray guns used shall be the type that can be cleaned without the need for spraying the solvent into the air.
  - (5) All solvent sprayed during cleanup or resin changes shall be directed into containers, such containers shall be closed as soon as solvent spraying is complete and the waste solvent shall be disposed of in such a manner that evaporation is minimized.
  - (6) Storage containers used to store VOC- and/or HAP- containing materials shall be kept covered when not in use.

**Alternative Operating Scenario 1: Until August 23, 2004**

D.1.3 Reinforced Plastics Composites Fabricating Emission Units [326 IAC 20-25-3]

- (a) Pursuant to 326 IAC 20-25-3(a), until August 23, 2004, the total HAP monomer content of the following materials shall be limited depending on the application method and products produced as specified below.

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

\*Categories that must use mechanical non-atomized application technology or manual application as stated in subsection (b).

- (b) Pursuant to 326 IAC 20-25-3(b), except as provided in 326 IAC 20-25-3(f), the following categories of materials in 326 IAC 20-25-3(a) shall be applied using mechanical non-atomized application technology or manual application:
- (1) Production non-corrosion 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.
- (c) Pursuant to 326 IAC 20-25-3(c), unless specified in 326 IAC 20-25-3(b), gel coat application and mechanical application of resins shall be by any of the following spray technologies:
- (1) Non-atomized application technology.
  - (2) Air-assisted airless.
  - (3) Airless.
  - (4) High volume, low pressure.
  - (5) Equivalent emission reduction technologies to subdivisions (2) through (4).
- (d) Pursuant to 326 IAC 20-25-3(d), cleaning operations for resin and gel coat application equipment are as follows:
- (1) For routine flushing of resin and gel coat application equipment such as spray guns, flowcoaters, brushes, rollers, and squeegees, a cleaning solvent shall contain no HAP. 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 326 IAC 20-25-3(d).
- (e) Pursuant to 326 IAC 20-25-3(g), the Permittee may comply with this section using monthly emission averaging within each resin or gel coat application category listed in 326 IAC 20-25-3(a) without prior approval by the commissioner.
- (f) Pursuant to 326 IAC 20-25-3(h), upon written application by the Permittee, the commissioner may approve the following:
  - (1) Enforceable alternative emission reduction techniques that are at least equally protective of the environment as the emission standards in 326 IAC 20-25-3(a) through (d).
  - (2) Use of monthly emissions averaging for any or all material or application categories listed in 326 IAC 20-25-3(a) if the following conditions are met:
    - (A) The Permittee shows that emissions did not exceed the emissions that would have occurred if each emission unit had met the requirements of 326 IAC 20-25-3(a) through (c).
    - (B) The Permittee uses any one (1) or a combination of the following emission reduction techniques:
      - (i) Resins or gel coats with HAP monomer contents lower than specified in 326 IAC 20-25-3(a).
      - (ii) Vapor suppressed resins.
      - (iii) Vacuum bagging or other similar technique. This item does not include resin transfer molding or compression molding.
      - (iv) Air pollution control equipment where the emissions are estimated based on parametric measurements or stack monitoring.
      - (v) Controlled spray used in combination with automated actuators or robots.
      - (vi) Controlled spray that includes the following:
        - (AA) Mold flanges.
        - (BB) Spray technique.
        - (CC) Spray gun pressure.
        - (DD) Means of verifying continuous use of the controlled spray technique, such as mass balance of materials and products (surface area and thickness of product) as approved by the commissioner prior to implementation.

- (vii) Emission reduction techniques approved under 326 IAC 20-25-3(h)(1).

Permittees using averaging shall not use spray equipment that produces higher emissions than the equipment specified in 326 IAC 20-25-3(c)(2) through (c)(5).

- (g) Pursuant to 326 IAC 20-25-3(i), to determine emission estimates, the following references or methods shall be used:
- (1) "Unified Emission Factors for Open Molding of Composites", April 1999, except use of controlled spray emission factors must be approved by the commissioner.
  - (2) "Compilation of Emission Factors", Volume 1, Fifth Edition, and supplements, January 1995, except for hand lay-up and spray lay-up operations emission factors.
  - (3) Site-specific values or other means of quantification provided the site-specific values and the emission factors are acceptable to the commissioner and U.S. EPA.

***Alternative Operating Scenario 1: Until August 23, 2004***

D.1.4 Work Practice Standards [326 IAC 20-25-4]

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Pursuant to 326 IAC 20-25-4, until August 23, 2004, the Permittee shall operate the fiberglass lay-up operations (P2-3, P3-2, and P3X-2) in accordance with the following work practice standards:

- (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 326 IAC 20-25-4(7), 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 HAP.
  - (2) All production and tooling gel coats that contain HAP.
  - (3) Waste resins and gel coats that contain HAP.
  - (4) Cleaning materials, including waste cleaning materials.
  - (5) Other materials that contain HAP.
- (g) All resin and gel coat mixing containers with a capacity equal to or greater than fifty-five (55) gallons must have a cover with no visible gaps in place at all times except when material is being added to or removed from a container, or when mixing or pumping equipment is being placed in or removed from a container.

***Alternative Operating Scenario 2: On and After August 23, 2004***

**D.1.5 Work Practice Standards [326 IAC 20-48-3]**

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On and after August 23, 2004, pursuant to 326 IAC 20-48-3, the Permittee shall operate the three (3) fiberglass lay-up operations (P2-3, P3-2 and P3X-2) and the tooling operations in accordance with the following work practice standards:

- (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 (HAP). However, recycled cleaning solvents that contain less than or equal to five (5) percent HAP by weight are considered to contain no HAP for the purposes of this condition. 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 HAP.
  - (2) All production and tooling gel coats that contain HAP.
  - (3) Waste resins and gel coats that contain HAP.
  - (4) Cleaning materials, including waste cleaning materials.
  - (5) Other materials that contain HAP.

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.

***Alternative Operating Scenario 2: On and After August 23, 2004***

**D.1.6 Operator Training [326 IAC 20-48-4]**

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On and after August 23, 2004, pursuant to 326 IAC 20-48-4, the Permittee shall comply with the following operator training:

- (a) 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 paragraph (b) of this condition 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 paragraph (a)(1) of this condition 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) 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.

**Alternative Operating Scenario 2: On and After August 23, 2004**

D.1.7 Standards for Boat Manufacturing [40 CFR 63, Subpart VVVV] [326 IAC 20-48]

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- (a) Pursuant to 40 CFR 63.5695 and 326 IAC 20-48, the Permittee shall comply with 40 CFR 63, Subpart VVVV on and after August 23, 2004.
- (b) Pursuant to 40 CFR 63, Subpart VVVV, this source is subject to the following conditions:  
Organic HAP emissions from the following open molding operations:
  - (1) Production resin.
  - (2) Pigmented and clear gel coat.
  - (3) Tooling resin and gel coat.

is limited by the following equation:

$$HAPLimit = [46(M_R) + 159(M_{PG}) + 291(M_{CG}) + 54(M_{TR}) + 214(M_{TG})]$$

based on a 12-month rolling average.

where:

HAP Limit = total allowable organic HAP that can be emitted from the open molding operations, in kilograms.

$M_R$  = mass of production resin used in the past 12 months, excluding any exempt materials, in megagrams.

$M_{PG}$  = mass of pigmented gel coat used in the past 12 months, excluding any exempt materials, in megagrams.

$M_{CG}$  = mass of clear gel coat used in the past 12 months, excluding any exempt materials, in megagrams.

$M_{TR}$  = mass of tooling resin used in the past 12 months, excluding any exempt materials, in megagrams.

$M_{TG}$  = mass of tooling gel coat used in the past 12 months, excluding any exempt materials, in megagrams.

**Alternative Operating Scenario 2: On and After August 23, 2004**

**D.1.8 Compliance Requirements [40 CFR 63, Subpart VVVV] [326 IAC 20-48]**

The Permittee shall use one or both of the following options to meet the emission limit in Condition D.1.7. Operations and materials not included in the emissions average in paragraph (a) shall comply with paragraph (b) of this condition:

- (a) Emissions averaging: Demonstrate that actual emissions from the open molding resin and gel coat operations that are averaged are less than or equal to the emission limit in Condition D.1.7.
- (b) Compliant materials usage: The weighted average HAP content shall not exceed the percentages in the following table:

For this operation	And this application method	The weighted average HAP content shall not exceed
1. Production Resin Operations	Atomized (spray)	28%
2. Production Resin Operations	Nonatomized (nonspray)	35%
3. Pigmented Gel Coat Operations	Atomized (spray)	33%
4. Pigmented Gel Coat Operations	Nonatomized (nonspray)	40%
5. Clear Gel Coat Operations	Atomized (spray)	48%
6. Clear Gel Coat Operations	Nonatomized (nonspray)	55%
7. Tooling Resin Operations	Atomized (spray)	30%
8. Tooling Resin Operations	Nonatomized (nonspray)	39%
9. Tooling Gel Coat Operations	Atomized (spray)	40%
10. Tooling Gel Coat Operations	Nonatomized (nonspray)	54%

Compliance with either option is based on a twelve (12) month rolling average.

**D.1.9 PSD Minor Limit [326 IAC 2-2]**

Use of resins, gel coats and clean-up solvents, and other material containing volatile organic compounds (VOC), shall be limited such that the potential to emit (PTE) VOC shall be less than 246.0 tons per consecutive twelve (12) month period. Compliance with this limit shall be determined based upon the following criteria:

- (a) Monthly usage by weight, monomer content, method of application, and other emission reduction techniques for each gel coat and resin shall be recorded. VOC emissions shall be calculated by multiplying the usage of each gel coat and resin by the emission factor that is appropriate for the monomer content, method of application, and other emission reduction techniques for each gel coat and resin, and summing the emissions for all gel coats and resins. Emission factors shall be obtained from the reference approved by IDEM, OAQ.
- (b) Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA-approved form, emission factors for the gel coat and resin applications shall be taken from the following reference approved by IDEM, OAQ: "Unified Emission Factors for Open Molding of Composites," Composites Fabricators Association, July 23, 2001, or its update. For the purposes of these emission calculations, monomer in resins and gel coats that is not styrene shall be considered as styrene on an equivalent weight basis.

- (c) VOC emissions from each of the other operations shall be based on an emission factor of 2000 pounds of VOC emitted per ton of VOC used.

This limitation, in conjunction with the potential to emit VOC of 4.0 tons per year from insignificant activities, will prevent the VOC emissions from being greater than 250 tons per year. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

**D.1.10 Particulate Matter (PM) [40 CFR 52, Subpart P]**

---

Pursuant to T085-7516-00031, issued on June 3, 1999 and 40 CFR 52, Subpart P, the PM from the three (3) fiberglass lay-up operations (P2-3, P3-2, and P3X-2), the upholstery glue application area (P1-1), and the three (3) assembly glue application areas (P2-1, P3-1, and P3X-1) shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

**D.1.11 Particulate [326 IAC 6-3-2(d)]**

---

Pursuant to T085-7516-00031, issued on June 3, 1999, and 326 IAC 6-3-2(d), particulate from the reinforced plastics composites fabricating manufacturing processes shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

**D.1.12 Preventive Maintenance Plan [326 IAC 2-7-5(13)]**

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

**Compliance Determination Requirements**

**D.1.13 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]**

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Compliance with the VOC content and usage limitations contained in Conditions D.1.1 and D.1.5 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

**D.1.14 Volatile Organic Compounds (VOC) and Volatile Organic Hazardous Air Pollutants (HAP)**

---

Compliance with the monomer content and usage limitations contained in Condition D.1.2 shall be determined pursuant to Condition D.1.2(a) and D.1.2(b).

***Alternative Operating Scenario 1: Until August 23, 2004***

**D.1.15 Hazardous Air Pollutants (HAP) [326 IAC 20-25-5]**

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Pursuant to 326 IAC 20-25-5(c), compliance with the HAP monomer content and usage limitations specified in condition D.1.3 shall be determined using one (1) of the following:

- (a) The manufacturer's certified product data sheet.
- (b) The manufacturer's material safety data sheet.
- (c) Sampling and analysis, using any of the following test methods, as applicable:
  - (1) 40 CFR 60, Method 24, Appendix A (July 1, 1998), shall be used to measure the total volatile HAP content of resins and gel coats. Method 24 may be modified for

measuring the volatile HAP content of resins or gel coats to require that the procedure be performed on uncatalyzed resin or gel coat samples.

- (2) 40 CFR 63, Method 311, Appendix A (July 1, 1998), shall be used to measure HAP content in resins and gel coats by direct injection into a gas chromatograph.
- (3) Upon written application by the source, the commissioner may approve an alternative test method.

When a MSDS, a certified product data sheet, or other document specifies a range of values, the values resulting in the greatest calculated emissions shall be used for determining compliance with Condition D.1.3.

**Alternative Operating Scenario 2: On and After August 23, 2004**

**D.1.16 HAP Emission Compliance [40 CFR 63, Subpart VVVV]**

---

- (a) Pursuant to 40 CFR 63.5704(a), the Permittee shall do the following to demonstrate compliance with Condition D.1.8(a):
  - (1) Determine the organic HAP content of resins and gel coats using the methods specified in 40 CFR 63.5758.
  - (2) Complete the following calculations to show that the organic HAP emissions do not exceed the limit specified in Condition D.1.7:
    - (A) Use the following equation to demonstrate that the organic HAP emissions from those operations included in the average do not exceed the emission limit in Condition D.1.7 calculated for the same twelve (12) month period.

$$\text{HAP emissions} = [(P_{V_R})(M_R) + (P_{V_{PG}})(M_{PG}) + (P_{V_{CG}})(M_{CG}) + (P_{V_{TR}})(M_{TR}) + (P_{V_{TG}})(M_{TG})]$$

Where:

HAP emissions = Organic HAP emissions calculated using MACT model point values for each operation included in the average, kilograms.

$P_{V_R}$  = Weighted average MACT model point value for production resin used in the past 12 months, kilograms per megagram.

$M_R$  = Mass of production resin used in the past 12 months, megagrams.

$P_{V_{PG}}$  = 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, megagrams.

$P_{V_{CG}}$  = 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 used in the past 12 months, megagrams.

$P_{V_{TR}}$  = Weighted average MACT model point value for tooling resin used in the past 12 months, kilograms per megagram.

$M_{TR}$  = Mass of tooling resin used in the past 12 months, megagrams.

$PV_{TG}$  = 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 used in the past 12 months, megagrams.

- (B) Use the following equation at the end of the month to compute the weighted average MACT model point value for each open molding resin and gel coat operation included in the average.

$$PV_{OP} = \frac{\sum_{i=1}^n (M_i PV_i)}{\sum_{i=1}^n (M_i)}$$

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, kilograms of HAP per megagram of material applied.

$M_i$  = Mass of resin or gel coat  $i$  used within an operation in the past 12 months, megagrams.

$n$  = 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, kilograms of HAP per megagram of material applied.

(3) Keep records as specified in Condition D.1.20.

(4) Submit reports as specified in Condition D.1.22.

Condition D.1.16(a) is only required when using the emissions averaging option in Condition D.1.8(a).

- (b) Pursuant to 40 CFR 63.5704(b), the Permittee shall do the following to demonstrate compliance with Condition D.1.7(b):

(1) Determine the organic HAP content of resins and gel coats using the methods specified in 40 CFR 63.5758.

(2) Complete the calculations described in 40 CFR 63.5713 to show that the weighted average organic HAP content does not exceed the limit specified in the table in Condition D.1.8(b).

(3) Keep records as specified in Condition D.1.20.

(4) Submit reports as specified in Condition D.1.22.

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

### **D.1.17 Monitoring**

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- (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 fiberglass lay-up operation stacks (S2-1, S2-2, S2-3, S2-4, S3/3X-1, S3/3X-2, S3/3X-3, S3/3X-4, S3/3X-5, S3/3X-6, and S3/3X-7) while one or more of the facilities are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the 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.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

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

### **D.1.18 Record Keeping Requirements**

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- (a) To document compliance with Conditions D.1.1 and D.1.9, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC usage limits and the VOC emission limits established in Conditions D.1.1 and D.1.9. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period. For Plants 2, 3, and the Plant 3 expansion the following records shall be maintained:
  - (1) The amount and VOC content of each material and solvent used per month. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used;
  - (2) The cleanup solvent usage for each month;
  - (3) The total VOC usage for each month; and
  - (4) The weight of VOC emitted for each compliance period.
- (b) To document compliance with Condition D.1.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the volatile organic HAP emission limits established in Condition D.1.2.
  - (1) The usage by weight and monomer content of resin and gel coat used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used;
  - (2) A log of the dates of use;

- (3) Method of application and other emission reduction techniques for each resin and gel coat used;
  - (4) The calculated total volatile organic HAP emitted from resin and gel coat usage for each month and for the compliance period; and
  - (5) The calculated total VOC emitted from resin and gel coat usage for each month and for the compliance period.
- (c) To document compliance with Conditions D.1.12 and D.1.17, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
  - (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

***Alternative Operating Scenario 1: Until August 23, 2004***

**D.1.19 Record Keeping Requirements [326 IAC 20-25-6]**

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- (a) Pursuant to 326 IAC 20-25-6(a), on and after January 1, 2002, the Permittee shall maintain records that are complete and sufficient to establish compliance with the requirements of 326 IAC 20-25. Examples of such records are as follows:
  - (1) Purchase orders.
  - (2) Invoices.
  - (3) Material safety data sheets (MSDS).
  - (4) Manufacturer's certified product data sheets.
  - (5) Calculations.
  - (6) Other records to confirm compliance.
- (b) Pursuant to 326 IAC 20-25-6(b), the Permittee shall maintain records of all information, including all reports and notifications required by 326 IAC 20-25. Such records shall be recorded in a form suitable and readily available for inspection and review. Except as provided in 326 IAC 20-25-8(d), the records shall be retained for at least five (5) years following the date of each occurrence, measurement, or record. At a minimum, the most recent two (2) years of data shall be retained on site. The remaining three (3) years of data may be retained off site.

***Alternative Operating Scenario 2: On and After August 23, 2004***

**D.1.20 Record Keeping Requirements [40 CFR 63, Subpart VVVV]**

---

- (a) Pursuant to 40 CFR 63.5704(a), the Permittee shall maintain records that are complete and sufficient to establish compliance with the requirements of 40 CFR 63, Subpart VVVV and Condition D.1.16(a). The following records shall be kept for each resin and gel coat:
  - (1) HAP content.
  - (2) Amount of material used per month.
  - (3) 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.

- (4) Calculations performed to demonstrate compliance based on MACT model point values.
- (b) Pursuant to 40 CFR 63.5704(b), the Permittee shall maintain records that are complete and sufficient to establish compliance with the requirements of 40 CFR 63, Subpart VVVV and Conditions D.1.7, D.1.8(b), and D.1.16(b). The following records shall be kept for each resin and gel coat:
  - (1) HAP content.
  - (2) 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.
  - (3) Amount of material used per month. This record is not required for an operation if all materials used for that operation comply with the organic HAP content requirements.
  - (4) Calculations performed, if required, to demonstrate compliance based on weighted average organic HAP content as described in 40 CFR 63.5713.

#### D.1.21 Reporting Requirements

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A quarterly summary of the information to document compliance with Conditions D.1.1(b), D.1.2, and D.1.5 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

#### ***Alternative Operating Scenario 2: On and After August 23, 2004***

#### D.1.22 Reporting Requirements [40 CFR 63, Subpart VVVV]

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- (a) Pursuant to 40 CFR 63.5704(a), the Permittee shall:
  - (1) Submit the implementation plan to U.S. EPA and IDEM, OAQ, and keep it up to date. The implementation plan must be submitted with the notification of compliance status specified in 40 CFR 63.5761, no later than September 22, 2005.
  - (2) Submit semiannual compliance reports to U.S. EPA and IDEM, OAQ as specified in 40 CFR 63.5764. If the Permittee is not using an add-on control device to comply with the limit, the first compliance report must cover the period beginning August 23, 2004 through December 31, 2005. The first compliance report must be postmarked or delivered no later than 60 calendar days after December 31, 2005.
- (b) Pursuant to 40 CFR 63.5704(b), the Permittee shall submit semiannual compliance reports to U.S. EPA and IDEM, OAQ as specified in 40 CFR 63.5764.

## SECTION D.2 FACILITY OPERATION CONDITIONS

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

one (1) woodworking operation (P1-2), constructed in 1993, located in Plant 1, consisting of three (3) routers, three (3) table saws, three (3) chop saws, and one (1) belt sander, processing a maximum of 1100 pounds of plywood per hour, with a cyclone for particulate matter control, and exhausting through one (1) stack (S1-2).

(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 woodworking operation shall not exceed 2.75 pounds per hour when operating at a process weight rate of 1100 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:

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

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

#### D.2.2 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 this facility and its control device.

### Compliance Determination Requirements

#### D.2.3 Particulate Control

The cyclone for particulate control shall be in operation at all times when the woodworking facility is in operation.

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

#### D.2.4 Visible Emissions Notations

- (a) Daily visible emission notations of the cyclone 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) 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 violation of this permit.

#### D.2.5 Cyclone Inspections

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An inspection shall be performed each calendar quarter of all cyclones controlling the woodworking operation when venting to the atmosphere. A cyclone 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.

#### D.2.6 Cyclone Failure Detection

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In the event that cyclone failure has been observed: Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions). Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

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

#### D.2.7 Record Keeping Requirements

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- (a) To document compliance with Condition D.2.4, the Permittee shall maintain records of daily visible emission notations of the cyclone exhaust.
- (b) To document compliance with Condition D.2.5, the Permittee shall maintain records of the results of the inspections required under Condition D.2.5 and the dates the vents are redirected.
- (c) To document compliance with Condition D.2.2, the Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

### SECTION D.3 FACILITY OPERATION CONDITIONS

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

- (a) one (1) trim-off operation consisting of hand-held grinders in Plant 3 and the Plant 3 expansion for trimming/grinding boats after removed from molds with a maximum process weight rate of 2,575 pounds per hour, with two (2) baghouses (BH-1 and BH-2) for control of PM and PM10 emissions, exhausting inside the building. [326 IAC 6-3-2]
- (b) one (1) trim-off operation consisting of hand-held grinders in Plant 2 for trimming/grinding boats after removed from molds with a maximum process weight rate of 2,575 pounds per hour, with one (1) baghouse (Plant #2 Baghouse) for control of PM and PM10 emissions, exhausting inside the building. [326 IAC 6-3-2]

(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 6-3-2]

- (a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the trim-off operation located in Plant 3 shall not exceed 4.86 pounds per hour when operating at a process weight rate of 2,575 pounds per hour. The pounds per hour limitation was calculated using 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:

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

- (b) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the trim-off operation in Plant 2 shall not exceed 4.86 pounds per hour when operating at a process weight rate of 2,575 pounds per hour. The pounds per hour limitation was calculated using 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:

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

#### Compliance Determination Requirement

##### D.3.2 Particulate Control

- (a) In order to comply with D.3.1(a), the two (2) baghouses (BH-1 and BH-2) for particulate control shall be in operation and control emissions from the trim-off operation located at Plant 3 at all times that the grinders are in operation.

- (b) In order to comply with D.3.1(b), the one (1) baghouse (Plant #2 Baghouse) for particulate control shall be in operation and control emissions from the trim-off operation located at Plant 2 at all times that the grinders are in operation.

## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

### PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Rinker Boat Company, Inc.  
Source Address: 300 West Chicago Street, Syracuse, Indiana 46567  
Mailing Address: 300 West Chicago Street, Syracuse, Indiana 46567  
Part 70 Permit No.: T085-17904-00031

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Phone:

Date:

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

**PART 70 OPERATING PERMIT  
EMERGENCY OCCURRENCE REPORT**

Source Name: Rinker Boat Company, Inc.  
Source Address: 300 West Chicago Street, Syracuse, Indiana 46567  
Mailing Address: 300 West Chicago Street, Syracuse, Indiana 46567  
Part 70 Permit No.: T085-17904-00031

**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) <ul style="list-style-type: none"><li>C The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and</li><li>C The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16.</li></ul> |
|--|

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 <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by:

Title / Position:

Date:

Phone:

A certification is not required for this report.

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

## Part 70 Quarterly Report

Source Name: Rinker Boat Company, Inc.  
Source Address: 300 West Chicago Street, Syracuse, Indiana 46567  
Mailing Address: 300 West Chicago Street, Syracuse, Indiana 46567  
Part 70 Permit No.: T085-17904-00031  
Facility: P3X-2  
Parameter: VOC emissions  
Limit: Less than 100.0 tons per consecutive twelve (12) month period

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 Quarterly Report**

Source Name: Rinker Boat Company, Inc.  
Source Address: 300 West Chicago Street, Syracuse, Indiana 46567  
Mailing Address: 300 West Chicago Street, Syracuse, Indiana 46567  
Part 70 Permit No.: T085-17904-00031  
Facility: P1-1, P2-1, P2-3, P3-1, P3-2, P3X-1, P3X-2  
Parameter: VOC emissions from resins, gel coats, clean-up solvents, and other  
VOC-containing material  
Limit: Less than 246.0 tons per consecutive twelve (12) month period

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: Rinker Boat Company, Inc.  
 Source Address: 300 West Chicago Street, Syracuse, Indiana 46567  
 Mailing Address: 300 West Chicago Street, Syracuse, Indiana 46567  
 Part 70 Permit No.: T085-17904-00031

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

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

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

Form Completed By:

Title/Position:

Date:

Phone:

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 Renewal

Source Name: Rinker Boat Company, Inc.  
Source Location: 300 West Chicago Street, Syracuse, Indiana 46567  
County: Kosciusko  
SIC Code: 3732  
Operation Permit No.: T085-17904-00031  
Permit Reviewer: Chrystal Wagner

On May 25, 2004, the Office of Air Quality (OAQ) had a notice published in the Time Union, Warsaw, Indiana, stating that Rinker Boat Company, Inc. had applied for a Part 70 Operating Permit renewal for a boat building and repairing operation. The notice also stated that OAQ proposed to issue a permit renewal for this operation and provided information on how the public could review the proposed permit renewal 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 renewal should be issued as proposed.

On June 17, 2004, Joe VanCamp, Cornerstone Environmental, Health & Safety, submitted comments on behalf of Rinker Boat Company, Inc. on the proposed Part 70 permit renewal.

Upon further review, OAQ has made the following revisions to the permit (**bolded** language has been added, ~~struck~~ language has been deleted). The Table of Contents has been modified to reflect these changes.

### TSD

#### **Changes Resulting from Ozone 8-hour County Attainment Status Designations:**

On April 15, 2004, the United States Environmental Protection Agency (U.S. EPA) named 23 Indiana counties and one partial county nonattainment for the new 8-hour ozone standard. The designations became effective on June 15, 2004. Kosciusko County has been designated as attainment for the 8-hour ozone standard. Therefore, no changes to this permit are necessary.

Although the TSD itself will not be revised as it is a historical document and the TSD was correct at the time of public notice, the following is being provided to show how the county attainment status has been affected as a result of the 8-hour ozone standard designations. The county attainment status regarding other pollutants remains unchanged; therefore will not be shown below other than in the table.

#### **County Attainment Status**

The source is located in Kosciusko County.

Pollutant	Status
PM-10	attainment
SO <sub>2</sub>	attainment
NO <sub>2</sub>	attainment
1-hour Ozone	attainment

8-hour Ozone	attainment
CO	attainment
Lead	attainment

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 emissions and NOx are considered when evaluating the rule applicability relating to the ozone standards. Kosciusko County has been designated as attainment or unclassifiable for the ozone standards. Therefore, VOC emissions and NOx were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.

**Section D**

**OAQ Change D-1:**

Condition D.1.8(a) has been updated to clarify the requirement.

***Alternative Operating Scenario 2: On and After August 23, 2004***

**D.1.8 Compliance Requirements [40 CFR 63, Subpart VVVV] [326 IAC 20-48]**

The Permittee shall use one or both of the following options to meet the emission limit in Condition D.1.7. Operations and materials not included in the emissions average in paragraph (a) shall comply with paragraph (b) of this condition:

- (a) Emissions averaging: Demonstrate that **actual** emissions from the open molding resin and gel coat operations that are averaged ~~meet~~ **are less than or equal to** the emission limit in Condition D.1.7.

**OAQ Change D-2:**

Condition D.1.16(a) has been updated to clarify the requirement.

***Alternative Operating Scenario 2: On and After August 23, 2004***

**D.1.16 HAP Emission Compliance [40 CFR 63, Subpart VVVV]**

- (a) Pursuant to 40 CFR 63.5704(a), the Permittee shall do the following to demonstrate compliance with Condition D.1.8(a):
  - (1) Determine the organic HAP content of resins and gel coats using the methods specified in 40 CFR 63.5758.
  - (2) Complete the following calculations to show that the organic HAP emissions do not exceed the limit specified in Condition D.1.7:
    - (A) Use the following equation to demonstrate that the organic HAP emissions from those operations included in the average do not exceed the emission limit in Condition D.1.7 calculated for the same twelve (12) month period.

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

Where:

HAP emissions = Organic HAP emissions calculated using MACT model point values for each operation included in the average, kilograms.

PV<sub>R</sub> = Weighted average MACT model point value for production resin used in the

past 12 months, kilograms per megagram.

$M_R$  = Mass of production resin used in the past 12 months, megagrams.

$PV_{PG}$  = 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, megagrams.

$PV_{CG}$  = 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 used in the past 12 months, megagrams.

$PV_{TR}$  = Weighted average MACT model point value for tooling resin used in the past 12 months, kilograms per megagram.

$M_{TR}$  = Mass of tooling resin used in the past 12 months, megagrams.

$PV_{TG}$  = 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 used in the past 12 months, megagrams.

- (B) Use the following equation at the end of the month to compute the weighted average MACT model point value for each open molding resin and gel coat operation included in the average.

$$PV_{OP} = \frac{\sum_{i=1}^n (M_i PV_i)}{\sum_{i=1}^n (M_i)}$$

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, kilograms of HAP per megagram of material applied.

$M_i$  = Mass of resin or gel coat  $i$  used within an operation in the past 12 months, megagrams.

$n$  = 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, kilograms of HAP per megagram of material applied.

- (3) Keep records as specified in Condition D.1.20.  
(4) Submit reports as specified in Condition D.1.22.

**Condition D.1.16(a) is only required when using the emissions averaging option in Condition D.1.8(a).**

**Comment 1:**

The record keeping requirement in Condition D.1.18(a)(i) is no longer applicable. The facility no longer determines its VOC emissions based on the number of boats produced or the number of boat feet produced on a daily basis. Instead, the facility tracks monthly usage of resins and gel coats and uses the CFA emission factors to determine its VOC emissions.

**Response to Comment 1:**

OAQ agrees. Condition D.1.18 has been modified.

**D.1.18 Record Keeping Requirements**

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- (a) To document compliance with Conditions D.1.1 and D.1.9, the Permittee shall maintain records in accordance with (1) through ~~(2)~~ **(4)** below. Records maintained for (1) through ~~(2)~~ **(4)** shall be taken daily and shall be complete and sufficient to establish compliance with the VOC usage limits and the VOC emission limits established in Conditions D.1.1 and D.1.9. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period. For Plants 2, 3, and the Plant 3 expansion the following records shall be maintained:
- ~~(i)~~ **(1)** ~~A log of the number of boats produced in Plants 2 and 3 and the number of boat feet produced in the Plant 3 expansion on a daily basis;~~
  - ~~(ii)~~ **(1)** The amount and VOC content of each material and solvent used per month. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
  - ~~(iii)~~ **(2)** The cleanup solvent usage for each month;
  - ~~(iv)~~ **(3)** The total VOC usage for each month; and
  - ~~(v)~~ **(4)** The weight of VOC emitted for each compliance period.
- (b) To document compliance with Condition D.1.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the volatile organic HAP emission limits established in Condition D.1.2.
- (1) The usage by weight and monomer content of resin and gel coat used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used;
  - (2) A log of the dates of use;
  - (3) Method of application and other emission reduction techniques for each resin and gel coat used;
  - (4) The calculated total volatile organic HAP emitted from resin and gel coat usage for each month and for the compliance period; and
  - (5) The calculated total VOC emitted from resin and gel coat usage for each month and for the compliance period.

- (c) To document compliance with Conditions D.1.12 and D.1.17, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

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



**Appendix A: Emission Calculations**

**HAP Emission Calculations**

**Company Name:** Rinker Boat Company, Inc.  
**Address City IN Zip:** 300 West Chicago Street, Syracuse, Indiana 46567  
**Permit Number:** T085-17904-00031  
**Pit ID:** 085-00031  
**Permit Reviewer:** Chrystal Wagner  
**Date:** May 11, 2004

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Toluene	Weight % n-Hexane	Toluene Emissions (ton/yr)	n-Hexane Emissions (ton/yr)	Total HAP Emissions per Coating (ton/yr)
P1-1								
Con-Bond 2725T Adhesive	6.8	0.546	1.0	24.10%	0.00%	3.92	0.00	3.92
P2-1								
Con-Bond 2725T Adhesive	6.8	0.546	1.0	24.10%	0.00%	3.92	0.00	3.92
P3-1								
Con-Bond 2725T Adhesive	6.8	0.728	1.0	24.10%	0.00%	5.23	0.00	5.23
P3X-1								
Con-Bond 2725T Adhesive	6.8	0.050	8.1	18.50%	7.10%	2.24	0.86	3.10

Total State Potential Emissions

**15.30      0.86      16.16**

**METHODOLOGY**

HAP emission rate (tons/yr) = Density (lb/gal) \* Gal of Material (gal/unit) \* Maximum (unit/hr) \* Weight % HAP \* 8760 hrs/yr \* 1 ton/2000 lbs

**Appendix A: Emissions Calculations**  
**Form DD: Reinforced Plastics and Composites**  
**Open Molding Operations\***  
**Resin and Gel Usage**  
**Company Name: Rinker Boat Company, Inc.**  
**Address City IN Zip: 300 West Chicago Street, Syracuse, Indiana 46567**  
**Operation Permit No.: T085-17904-00031**  
**Plt ID: 085-00031**  
**Reviewer: Chrystal Wagner**  
**Date: February 6, 2004**

Emission Unit ID	Material (Resin or Gel Name)	Density (Lb/Gal)	Weight % Monomer	Gal of Mat. (gal/unit)	Maximum usage (unit/hour)	UEF (lbs monomer/ton resin or gel)	Potential VOC/HAP (pounds per day)	Potential VOC/HAP (tons per year)	Transfer Efficiency	Potential PM (tons/year)
<b>P2-3</b>	Gray Gel Coat	10.000	42.00%	1.460	1.500	278.000	73.06	13.33	75%	13.91
	White Gel Coat	10.4	36.00%	5.46	1.500	223	228.81	41.76	75%	59.92
	Resin	9.1	35.00%	95.38	1.500	77	1202.99	219.55	95%	185.33
<b>P3-2</b>	White Gel Coat	10.4	36.00%	9.82	1.000	223	274.35	50.07	75%	71.85
	Resin	9.1	35.00%	170.00	1.000	77	1429.43	260.87	95%	220.22
	Bonding Putty	8.0	19.00%	5.46	1.000	47.88	25.10	4.58	100%	0.00
<b>P3X-2 Manual Resin Application</b> <b>P3X-2 Mechanical Non-Atomized Resin Application</b>	Ashland AME 1000 Resin	9.0	33.45%	0.06	8.125	85.7	4.51	0.82	100%	0.00
	Ashland AME 1000 Resin	9.0	33.45%	5.97	8.125	72.35	379.02	69.17	100%	0.00
<b>P3X-2 Mechanical Non-Atomized Gel Coat Application</b>	Evercoat Spraycore Resin	5.8	37.69%	0.35	8.125	85.07	16.84	3.07	100%	0.00
	Ferro Sand Ultra Gel Coat	10.9	32.20%	0.44	8.125	189	88.38	16.13	100%	0.00
	Ferro Green Ultra Shield	9.4	33.60%	0.03	8.125	201.4	5.54	1.01	100%	0.00
<b>P3X-2 Mechanical Atomized Gel Coat Application</b>	Lilly Interior Sand White	11.4	33.98%	0.11	8.125	204.82	24.95	4.55	100%	0.00
	Ferro Sand Ultra Gel Coat	10.9	32.20%	0.19	8.125	108.8	21.97	4.01	75%	12.49
	Ferro Green Ultra Shield	9.4	33.60%	0.01	8.125	120	1.10	0.20	75%	0.56
<b>P3X-2 Mechanical Non-Atomized Gel Coat Application, Methyl Methacrylate</b>	Lilly Interior Sand White	11.4	33.98%	0.11	8.125	125.7	15.31	2.79	75%	7.34
	Ferro Sand Ultra Gel Coat	10.9	3.00%	0.44	8.125	45	21.04	3.84	100%	0.00
	Ferro Green Ultra Shield	9.4	8.00%	0.03	8.125	120	3.30	0.60	100%	0.00
<b>P3X-2 Mechanical Atomized Gel Coat Application, Methyl Methacrylate</b>	Lilly Interior Sand White	11.4	0.00%	0.11	8.125	0	0.00	0.00	100%	0.00
	Ferro Sand Ultra Gel Coat	10.9	3.00%	0.19	8.125	45	9.09	1.66	75%	17.87
	Ferro Green Ultra Shield	9.4	8.00%	0.01	8.125	120	1.10	0.20	75%	0.77
	Lilly Interior Sand White	11.4	0.00%	0.05	8.125	0	0.00	0.00	75%	5.05

<b>Total VOC/HAP and PM from Resin and Gel Use</b>	<b>691.92</b>	<b>(Styrene)</b>	<b>595.31</b>
	<b>6.30</b>	<b>(MMA)</b>	
	<b>698.22</b>		

\* Open Molding Operations include the following: manual application, mechanical application, gel coat application, and filament application.  
For all other fiberglass operations, use the AP-42 emission factors and the calculation spreadsheet fglassap42.wb3.

**METHODOLOGY**

Assume all of the monomer is styrene.

Use the standard VOC emissions calculation spreadsheet to calculate catalyst emissions and cleaning emissions (assume that 100% of the VOC and/or HAP in the catalysts and solvents used is emitted).

Use the emission factors based on the type of application from "Unified Emission Factors for Open Molding of Composites," Composites Fabricators Association (April 1999) to calculate resin and gelcoat emissions.

UEF: The United Emission Factor is the emission factor for the resin or gel styrene content that can be determined using the UEF Table. An interpolation calculator is provided on the next page for those styrene contents between the values given in the table that are not integers. Use the extrapolation equations given in the table for styrene contents that are less than or greater than the range of factors given in the table.

Potential VOC (lb/day) for resins or gels = Density (lb material /gal material) \* Gal. of material (gal material/unit) \* Maximum usage (unit/hr) \* UEF (lb styrene/ton material) \* 24 hrs/day \* 1 ton material/2000 lbs material

Potential VOC (ton/year) = Potential VOC (lb/day) \* 365 days/year \* (1 ton/2000 lb)

Potential PM (ton/year) = Density \* (1 - Weight % monomer or VOC) \* Gal. of Material \* Maximum Usage \* (1 - transfer efficiency) \* 24 hrs/day \* 365 days/year \* (1 ton/2000 lb)

**Appendix A: Emissions Calculations**

**Woodworking Operations**

**Company Name:** Rinker Boat Company, Inc.

**Address City IN Zip:** 300 West Chicago Street, Syracuse, Indiana 46567

**TVOP:** T085-17904-00031

**Reviewer:** Chrystal Wagner

**Date:** March 19, 2004

**Plant 1**

Woodworking Operation Equipped with One (1) Cyclone

Maximum Capacity = 1100 pounds plywood per hour

Controlled Wood Waste Produced: 2.31 lb/hr

Uncontrolled Wood Waste Produced: 11.53 lb/hr (based on source input of 2.31 lb/hr controlled waste produced and control efficiency of 80%)

Particulate Control Efficiency: 80%

$$\text{Potential Controlled PM Emissions} = \frac{11.53 \text{ lb wood waste}}{\text{hr}} \times \frac{\text{ton}}{2000 \text{ lb}} \times \frac{8760 \text{ hr}}{\text{yr}} \times (1 - 80\%) =$$

$$\text{Potential Unrestricted PM Emissions} = \frac{11.53 \text{ lb wood waste}}{\text{hr}} \times \frac{\text{ton}}{2000 \text{ lb}} \times \frac{8760 \text{ hr}}{\text{yr}} =$$

\* Pursuant to 326 IAC 6-3-2, PM emissions are limited to 2.75 pounds per hour.  
PM is assumed to equal PM-10.

**Appendix A: Emissions Calculations  
Natural Gas Combustion Only  
MM BTU/HR <100  
Small Industrial Boiler**

**Company Name:** Rinker Boat Company, Inc.  
**Address City IN Zip:** 300 West Chicago Street, Syracuse, Indiana 46567  
**Permit Number:** T085-17904-00031  
**Pit ID:** 085-00031  
**Reviewer:** Chrystal Wagner  
**Date:** March 26, 2004

Heat Input Capacity  
MMBtu/hr

Potential Throughput  
MMCF/yr

16.6

145.6

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.1	0.6	0.0	7.3	0.4	6.1

\*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

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

**Methodology**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See page 2 for HAP emissions calculations.

**Appendix A: Emissions Calculations  
 Natural Gas Combustion Only  
 MM BTU/HR <100  
 Small Industrial Boiler  
 HAP Emissions**

**Company Name:** Rinker Boat Company, Inc.  
**Address City IN Zip:** 300 West Chicago Street, Syracuse, Indiana 46567  
**Permit Number:** T085-17904-00031  
**Pit ID:** 085-00031  
**Reviewer:** Chrystal Wagner  
**Date:** March 26, 2004

HAP - Organics					
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	1.529E-04	8.738E-05	5.461E-03	1.311E-01	2.476E-04

HAP - Metals					
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	3.641E-05	8.010E-05	1.019E-04	2.767E-05	1.529E-04

Methodology is the same as page 1.

The five highest organic and metal HAP emission factors are provided above.  
 Additional HAP emission factors are available in AP-42, Chapter 1.4.