INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We make Indiana a cleaner, healthier place to live.

Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant

DATE: January 23, 2007

RE: Thunderbird Products / 001-18296-00031

FROM: Nisha Sizemore
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 impractible 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.

Enclosures
FNTVOP.dot 03/23/06

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PART 70 OPERATING PERMIT RENEWAL
OFFICE OF AIR QUALITY

Thunderbird Products
2200 West Monroe Street
Decatur, Indiana 46733

(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.: T001-18296-00031	
Issued by: Original signed by Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: January 23, 2007 Expiration Date:January 23, 2012

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SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates stationary fiberglass boat manufacturing and repair facility.

Responsible Official:	Plant Manager
Source Address:	2200 West Monroe Street, Decatur, Indiana 46733
Mailing Address:	2200 West Monroe Street, Decatur, Indiana 46733
General Source Phone Number:	(260) 724-9111
SIC Code:	3732
County Location:	Adams
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 Not 1 of 28 Source Categories

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

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

(a) Three (3) gel coating booths, identified as GSB4, GSB5, and GSB6, constructed in 1988, with a maximum capacity of 0.13 boats per hour per booth, using dry filters as particulate control, and exhausting to stacks 10, 11, and 12, respectively.

(b) Four (4) resin and foam filling booths, identified as STB1, STB2, STB3, and STB4, constructed in 1988, with a maximum capacity of 0.005 boats per hour per booth, using dry filters as particulate control, and exhausting to stacks 13, 14, 15, and 16, respectively.

(c) Six (6) IMRON paint spray booths for coating fiberglass, identified as SB1, SB2, SB3, SB4, SB5, constructed in 1988, and SB9, constructed in 2005, with a maximum capacity of 0.078 boats per hour per booth, using dry filters as particulate control, and exhausting to stacks 18, 19, 20, 21, 22, and 41, respectively.

(d) Eight (8) lamination and foam filling areas, identified as AV2, AV3, AV4, AV5, AV6, AV7, AV8, and AV9, with AV2 through AV7 constructed in 1988, with AV8 constructed in 2000, with AV9 constructed in 2002, with a maximum capacity of 0.13 boats per hour per area, using dry filters as particulate control, and exhausting to stacks 3, 4, 5, 6, 7, 8, 9, and 38, respectively.

(e) Eight (8) booths for gel coating/resin applications, identified as STB5 through STB12, with STB7 through STB11 constructed in 2000, with STB5, STB6 and STB12 constructed in 2002, with a maximum capacity of 0.025 boats per hour per booth, using dry filters as particulate control, and exhausting to stacks 27, 28, 29, 30, 31, 32, 36, and 37, respectively.

(f) Three (3) paint spray booths for coating fiberglass, identified as SB6, SB7, and SB8, constructed in 2000, with a maximum capacity of 0.025 boats per hour per booth, using dry filters as particulate control, and exhausting to stacks 33, 34, and 35, respectively.

(g) One (1) assembly, subassembly, upholstery area, including a small part assembly area, identified as AU1, constructed in 2000, with a maximum capacity of 0.25 boats per hour, and exhausting inside the building.

(h) Eight (8) gel coating/resin booths, identified as STB13 (exhausting to vent 043), STB14 (exhausting to vent 044), STB15 (exhausting to vent 045), STB16 (exhausting to vent 046), STB17 (exhausting to vent 047), STB18 (exhausting to vent 048), STB20 (exhausting to vent 050), and STB21 (exhausting to vent 051), constructed in 2006, with a maximum capacity of 0.0057 boat per hour per booth, using dry filters as particulate control.

(i) Two (2) gel coating/resin booths, identified as STB19 (exhausting to vent 049) and STB24 (exhausting to vent 054), constructed in 2006, with a maximum capacity of 0.02 boat per hour per booth, using dry filters as particulate control.

(j) One (1) gel coating/resin booth, identified as STB22, constructed in 2006, with a maximum capacity of 0.0125 boat per hour, using dry filters as particulate control, and exhausting to vent 052.

(k) One (1) gel coating/resin booth, identified as STB23, constructed in 2006, with a maximum capacity of 0.0167 boat per hour, using dry filters as particulate control, and exhausting to vent 053.

Under the National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing (40 CFR 63, Subpart VVVV), the above listed emission units are considered to be existing boat manufacturing operations.

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

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

(a) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as bag filter or cyclone, consisting of cut/trim, grinding, machining and wood working equipment, controlled with baghouses BH1 and BH2, and exhausting inside the building. [326 IAC 6-3-2]

(b) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]

(c) Other activities or categories not previously identified with emissions below insignificant thresholds, consisting of a wood/plastic working shop, controlled with baghouse BH3, and exhausting to stack 17. [326 IAC 6-3-2]

(d) Activities or categories not previously identified, with emissions below insignificant thresholds, and subject to a NESHAP:

(1) Mold making and repair activities using tooling resins and gelcoats, consisting of gel coating booths GSB1, GSB2, and GSB3, constructed in 1988, 1988, and 2006, respectively, with a combined maximum capacity of thirty (30) boat molds per year, using dry filters as particulate control, and exhausting to vents 039, 040, and 042, respectively.

(2) Use of organic peroxide catalysts in resin and gelcoat application areas.

(3) Return services limited to minor patching with gel resin and paint touch-up.

(4) Boat cavity foam filling operations.

(5) One (1) insignificant closed molding vacuum infusion process, constructed in

2005, and exhausting inside the building.

(6) One (1) R&D Area for mold repair and mold preparation, one (1) enclosed cutout/trimming area equipped with an air filtering and internal recirculating system, one (1) booth for top dressing of gel coat on small parts, and one (1) booth for grinding, buffing, and touch up, with emissions controlled by dry filters and exhausting inside the building.

(7) Eight (8) storage tanks with capacity less than or equal to 1000 gallons and annual throughput less than 12,000 gallons.

(8) Solvent recycling systems with batch capacity less than or equal to 100 gallons, consisting of three (3) Acetone recovery systems.

Under the National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing (40 CFR 63, Subpart VVVV), the above listed insignificant emission units are considered to be existing boat manufacturing operations.

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

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

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

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

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

B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5] [326 IAC 2-7-4(a)(1)(D)] [IC 13-15-3-6(a)]

(a) This permit, T001-18296-00031, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

(b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

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

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

(a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or

(b) the emission unit to which the condition pertains permanently ceases operation.

B.4 Enforceability [326 IAC 2-7-7]

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

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

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

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

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

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

(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.

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

B.8 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state

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

(b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.

(c) A responsible official is defined at 326 IAC 2-7-1(34).

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

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

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

and

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

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

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and

(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

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

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

(a) The Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) for the source as described in 326 IAC 1-6-2. At a minimum, the PMPs shall include:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

(b) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

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

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or
Telephone Number: 317-233-0178 (ask for Compliance Section)
Facsimile Number: 317-233-6865

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

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

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

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and 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) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

(g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

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

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

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

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

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

(c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

(d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:

(1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

(2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and

(4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

(e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

(f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]

(g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

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

(a) All terms and conditions of permits established prior to T001-18296-00031 and issued pursuant to permitting programs approved into the state implementation plan have been either

(1) incorporated as originally stated,

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

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

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

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

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

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

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

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

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

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

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

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit 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.17 Permit Renewal [326 IAC 2-7-3] [326 IAC 2-7-4] [326 IAC 2-7-8(e)]

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

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue

Indianapolis, Indiana 46204-2251

(b) A timely renewal application is one that is:

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

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

(c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.

B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

(a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

(a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

(b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

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

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;

(3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

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

and

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

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-7-20(b), (c), or (e). The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-7-20(b)(1), (c)(1), and (e)(2).

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

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

(c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade emission increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

(d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

(e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.21 Source Modification Requirement [326 IAC 2-7-10.5]

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

B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2] [IC 13-30-3-1] [IC 13-17-3-2]

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

(a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records 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.23 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
Indianapolis, Indiana 46204-2251

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

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

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]

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

(b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

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

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]

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

C.2 Opacity [326 IAC 5-1]

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

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

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

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

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

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

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

C.6 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

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

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

(f) Demolition and renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

(g) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

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

C.7 Performance Testing [326 IAC 3-6]

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

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

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

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

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports 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.8 Compliance Requirements [326 IAC 2-1.1-11]

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

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

C.9 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

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

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

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

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

C.10 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

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

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

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

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

(a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on December 16, 1999.

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

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

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

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

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

(1) initial inspection and evaluation;

(2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or

(3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

(c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:

(1) monitoring results;

(2) review of operation and maintenance procedures and records;

(3) inspection of the control device, associated capture system, and the process.

(d) Failure to take reasonable response steps shall be considered a deviation from the permit.

(e) The Permittee shall maintain the following records:

(1) monitoring data;

(2) monitor performance data, if applicable; and

(3) corrective actions taken.

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

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

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

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

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

C.15 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

(a) In accordance with the compliance schedule specified in 326 IAC 2-6-3(b)(1), starting in 2007 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

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

(2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1 (32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

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

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

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

C.16 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

(a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the

Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.17 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

(a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken 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
Indianapolis, Indiana 46204-2251

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

Stratospheric Ozone Protection

C.18 Compliance with 40 CFR 82 and 326 IAC 22-1

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

(a) Persons opening appliances for maintenance, service, repair, or disposal 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) Three (3) gel coating booths, identified as GSB4, GSB5, and GSB6, constructed in 1988, with a maximum capacity of 0.13 boats per hour per booth, using dry filters as particulate control, and exhausting to stacks 10, 11, and 12, respectively.

(b) Four (4) resin and foam filling booths, identified as STB1, STB2, STB3, and STB4, constructed in 1988, with a maximum capacity of 0.005 boats per hour per booth, using dry filters as particulate control, and exhausting to stacks 13, 14, 15, and 16, respectively.

(c) Six (6) IMRON paint spray booths for coating fiberglass, identified as SB1, SB2, SB3, SB4, SB5, constructed in 1988, and SB9 constructed in 2005, with a maximum capacity of 0.078 boats per hour per booth, using dry filters as particulate control, and exhausting to stacks 18, 19, 20, 21, 22, and 41, respectively.

(d) Eight (8) lamination and foam filling areas, identified as AV2, AV3, AV4, AV5, AV6, AV7, AV8, and AV9, with AV2 through AV7 constructed in 1988, with AV8 constructed in 2000, with AV9 constructed in 2002, with a maximum capacity of 0.13 boats per hour per area, using dry filters as particulate control, and exhausting to stacks 3, 4, 5, 6, 7, 8, 9, and 38, respectively.

(e) Eight (8) booths for gel coating/resin applications, identified as STB5 through STB12, with STB7 through STB11 constructed in 2000, with STB5, STB6 and STB12 constructed in 2002, with a maximum capacity of 0.025 boats per hour per booth, using dry filters as particulate control, and exhausting to stacks 27, 28, 29, 30, 31, 32, 36, and 37, respectively.

(f) Three (3) paint spray booths for coating fiberglass, identified as SB6, SB7, and SB8, constructed in 2000, with a maximum capacity of 0.025 boats per hour per booth, using dry filters as particulate control, and exhausting to stacks 33, 34, and 35, respectively.

(g) One (1) assembly, subassembly, upholstery area, including a small part assembly area, identified as AU1, constructed in 2000, with a maximum capacity of 0.25 boats per hour, and exhausting inside the building.

(h) Eight (8) gel coating/resin booths, identified as STB13 (exhausting to vent 043), STB14 (exhausting to vent 044), STB15 (exhausting to vent 045), STB16 (exhausting to vent 046), STB17 (exhausting to vent 047), STB18 (exhausting to vent 048), STB20 (exhausting to vent 050), and STB21 (exhausting to vent 051), constructed in 2006, with a maximum capacity of 0.0057 boat per hour per booth, using dry filters as particulate control.

(i) Two (2) gel coating/resin booths, identified as STB19 (exhausting to vent 049) and STB24 (exhausting to vent 054), constructed in 2006, with a maximum capacity of 0.02 boat per hour per booth, using dry filters as particulate control.

(j) One (1) gel coating/resin booth, identified as STB22, constructed in 2006, with a maximum capacity of 0.0125 boat per hour, using dry filters as particulate control, and exhausting to vent 052.

(k) One (1) gel coating/resin booth, identified as STB23, constructed in 2006, with a maximum capacity of 0.0167 boat per hour, using dry filters as particulate control, and exhausting to vent 053.

Under the National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing (40 CFR 63, Subpart VVVV), the above listed emission units are considered to be existing boat manufacturing operations.

Insignificant Activities

(d) Activities or categories not previously identified, with emissions below insignificant thresholds, and subject to a NESHAP:

(1) Mold making and repair activities using tooling resins and gelcoats, consisting of gel coating booths GSB1, GSB2, and GSB3, constructed in 1988, 1988, and 2006, respectively, with a combined maximum capacity of thirty (30) boat molds per year, using dry filters as particulate control, and exhausting to vents 039, 040, and 042, respectively.

(2) Use of organic peroxide catalysts in resin and gelcoat application areas.

(3) Return services limited to minor patching with gel resin and paint touch-up.

(4) Boat cavity foam filling operations.

(5) One (1) insignificant closed molding vacuum infusion process, constructed in 2005, and exhausting inside the building.

(6) One (1) R&D Area for mold repair and mold preparation, one (1) enclosed cutout/trimming area equipped with an air filtering and internal recirculating system, one (1) booth for top dressing of gel coat on small parts, and one (1) booth for grinding, buffing, and touch up, with emissions controlled by dry filters and exhausting inside the building.

(7) Eight (8) storage tanks with capacity less than or equal to 1000 gallons and annual throughput less than 12,000 gallons.

(8) Solvent recycling systems with batch capacity less than or equal to 100 gallons, consisting of three (3) Acetone recovery systems.

Under the National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing (40 CFR 63, Subpart VVVV), the above listed insignificant emission units are considered to be existing boat manufacturing operations.

(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 PSD Minor Limit [326 IAC 2-2]

Pursuant to SPM 001-22659-00031, issued on May 4, 2006, and in order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable, the use of resins and gel coats at all gel coating and resin application booths, and the VOC input for the paint application booths, lamination and foam filling areas, and assembly, subassembly, and upholstery areas, combined, shall be limited such that the potential to emit (PTE) volatile organic compounds (VOC) shall be less than 244 tons per twelve (12) consecutive months, with compliance determined at the end of each month. This usage limit is required to limit the potential to emit of VOC from the entire source to less than 250 tons per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

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

Pursuant to Significant Source Modification 001-11987-00031, issued on October 6, 2000, and 326 IAC 8-1-6, the assembly, subassembly, and upholstery area (identified as AU1) shall comply with the following BACT requirements:

(1) The VOC content of the adhesives and sealants applied shall not exceed 9.5 pounds per gallon less water.

(2) The total VOC input to the assembly, subassembly, upholstery area operations, including any cleanup solvents, shall not exceed 55.9 tons per twelve (12) consecutive month period.

(3) Proper equipment cleanup and maintenance shall be performed, including containment of any solvent used during equipment cleanup. Such containers shall be closed as soon as cleanup is complete, and any waste solvent shall be disposed of in such a manner that minimizes evaporation.

D.1.3 Emissions from Fiberglass Boat Manufacturing [326 IAC 20-48-2]

Pursuant to 326 IAC 20-48-2, the Permittee shall comply with the alternative HAP content requirements for gel coat operations:

Gel Coat Application		
Operation	Application Method	Weighted-Average Percent Organic HAP Content (weight percent) Monthly Limit
Pigmented gel coat operations	Atomized (spray)	33 percent
Clear gel coat operations	Atomized (spray)	48 percent
Tooling gel coat operations	Atomized (spray)	40 percent
Pigmented gel coat operations	Nonatomized (nonspray)	40 percent
Clear gel coat operations	Nonatomized (nonspray)	55 percent
Tooling gel coat operations	Nonatomized (nonspray)	54 percent

Compliance with these HAP monomer content limits shall be demonstrated on a monthly weighted average basis. If all of the gel coats used during a month meet the specified HAP monomer content limits, then maintaining records of content and usage as specified under Condition D.1.11 is sufficient for demonstrating compliance with the HAP monomer content limits.

D.1.4 Work Practice Standards for Fiberglass Boat Manufacturing [326 IAC 20-48-3]

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

(a) Nonatomizing spray equipment shall not be operated at pressures that atomize the material during the application process.

(b) Solvents sprayed during cleanup and resin changes shall be directed into solvent collection containers.

(c) For routine flushing of resin and gel coat application equipment, such as spray guns, flowcoaters, brushes, rollers, and squeegees, owners or operators must use a cleaning solvent that contains no hazardous air pollutants (HAPs). However, recycled cleaning solvents that contain less than or equal to five percent (5%) HAP by weight are considered to contain no HAP for the purposes of this subdivision. For removing cured resin or gel coat from application equipment, no organic HAP limit applies.

(d) Clean-up rags with solvent shall be stored in closed containers.

(e) Closed containers shall be used for the storage of the following:

(1) All production and tooling resins that contain HAPs.

(2) All production and tooling gel coats that contain HAPs.

(3) Waste resins and gel coats that contain HAPs.

(4) Cleaning materials, including waste cleaning materials.

(5) Other materials that contain HAPs.

(f) The covers of the closed containers must have no visible gaps and must be in place at all times, except when equipment is placed in or removed from the container.

D.1.5 Operator Training for Fiberglass Boat Manufacturing [326 IAC 20-48-4]

Pursuant to 326 IAC 20-48-4, all new and existing personnel, including contract personnel, who are involved in resin and gel coat spraying and spray-like applications that could result in excess emissions if performed improperly, shall be trained according to the following schedule:

(a) All personnel hired shall be trained within fifteen (15) days of hiring.

(b) To ensure training goals listed in paragraph (d) are maintained, all personnel shall be given refresher training annually.

(c) Personnel who have been trained by another owner or operator subject to 326 IAC 20-48 are exempt from requirements of paragraph (a) if written documentation that the employee's training is current is provided to the new employer.

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

(1) Appropriate application techniques.

(2) Appropriate equipment cleaning procedures.

(3) Appropriate equipment setup and adjustment to minimize material usage and overspray.

D.1.6 Particulate [326 IAC 6-3-2(d)] [326 IAC 6-3-2]

(a) Pursuant to SPM 001-16599-00031, issued on January 10, 2003, and 326 IAC 6-3-2(d), particulate from the gel coating booths, resin and foam filling booths, paint spray booths, and gel coating/resin application booths (GSB4, GSB5, GSB6, STB 1 through STB24, SB1 through SB9, and AV2 through AV9) shall be controlled by a dry particulate filter, and the Permittee shall operate the control devices in accordance with manufacturer's specifications.

(b) Pursuant to 326 IAC 6-3-2, the particulate from the insignificant cutout/trimming area and booth for grinding, buffing, and touchup shall not exceed E as shown in the following formula:

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

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

The Permittee shall operate the particulate filters for the insignificant cutout/trimming area and booth for grinding, buffing, and touchup when these facilities are in operation.

D.1.7 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

D.1.8 Testing Requirements [326 IAC 20-48]

Compliance with the HAP monomer content limitation 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*, 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*, shall be used to measure HAP content in resins and gel coats by direct injection into a gas chromatograph.

(3) An alternative test method approved by IDEM, OAQ.

D.1.9 VOC Emissions [326 IAC 8-1-4][326 IAC 8-1-2(a)]

(a) Compliance with the VOC content and usage limitations contained in Conditions D.1.1 and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. Monthly usage by weight, monomer content, method of application, and other emission reduction techniques shall be recorded for each gel coat and resin.

(b) The VOC emissions from the gel coat and resin operations 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. 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: "Unified Emission Factors for Open Molding of Composites" July 23, 2001, or its updates.

(c) The VOC emissions from the paint spray booths, lamination and foam filling areas, and assembly, subassembly and upholstery areas shall be calculated by multiplying the usage of each material by the VOC content as shown on the MSDS. The VOC emissions for dilution solvents and cleanup solvents shall be calculated by multiplying the usage of each solvent by the VOC content as shown on the MSDS. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

D.1.10 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters controlling particulate emissions from the gelcoat, resin and foam fill, gel coat/resin, paint spray, and lamination and foam fill operations (GSB4, GSB5, GSB6, STB1 through STB24, SB1 through SB9, and AV2 through AV9). To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the gel coat, resin and foam fill, gel coat/resin, paint spray, and lamination and foam fill booth stacks (10, 11, 12, 13, 14, 15, 16, 27, 28, 29, 20, 31, 32, 36, 37, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54, 18, 19, 20, 21, 22, 33, 34, 35, 41, 3, 4, 5, 6, 7, 8, 9, and 38) while one or more of the booths are in operation. If a condition exists which should result

in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

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

D.1.11 Record Keeping Requirements

(a) To document compliance with the source-wide VOC limit in Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (7) below. Records maintained for (1) through (7) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC emission limits established in Condition D.1.1. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

(1) The usage by weight and monomer content of each resin and gel coat, and the amount and VOC content of each paint and solvent 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 monthly usage;

(3) Method of application and other emission reduction techniques for each resin and gel coat used;

(4) The calculated total volatile organic compound emissions from resin and gel coat, paint, and solvent use for each month.

(5) The amount and VOC content of each foam, surface coating, adhesive, dilution solvent and cleaning solvent used on a monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(6) The total VOC usage for each month; and

(7) The weight of VOCs emitted for each compliance period.

(b) To document compliance with the VOC content and usage limits in Condition D.1.2 for emission unit AU-1, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC content and usage limits established in Condition D.1.2. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

(1) The amount and VOC content of each adhesive, dilution solvent and cleaning solvent used on a monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(2) The total VOC usage for each month; and

(3) The weight of VOCs emitted for each compliance period.

(c) To document compliance with the HAP content limits in Condition D.1.3, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the hazardous air pollution (HAP) content limit established in Condition D.1.3.

(1) The amount and monomer content of each 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 month of use;

(3) Method of application and other emission reduction techniques for each resin and gel coat used;

(d) To document compliance with Condition D.1.5, the Permittee shall maintain the following training records on site and available for inspection and review:

(1) A copy of the current training program.

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

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

(e) To document compliance with Conditions D.1.10, the Permittee shall maintain a log of weekly overspray observations, and daily and monthly inspections.

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

D.1.12 Reporting Requirements

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

National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements [326 IAC 2-7-5(1)]

D.1.13 General Provisions Relating to HAPs [326 IAC 20-1-1][40 CFR 63, Subpart A]

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

(b) Pursuant to 40 CFR 63.10, the Permittee shall submit all required notifications and reports to:

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

D.1.14 Boat Manufacturing Operations NESHAP [326 IAC 20-48] [40 CFR Part 63, Subpart VVVV]

The Permittee that engages in boat manufacturing operations shall comply with the provisions of 40 CFR Part 63, Subpart VVVV, which are incorporated by reference as 326 IAC 20-48, as follows:

§ 63.5689 What parts of my facility are covered by this subpart?

The affected source (the portion of your boat manufacturing facility covered by this subpart) is the combination of all of the boat manufacturing operations listed in paragraphs (a) through (f) of this section.

(a) Open molding resin and gel coat operations (including pigmented gel coat, clear gel coat, production resin, tooling gel coat, and tooling resin).

(b) Closed molding resin operations.

(c) Resin and gel coat mixing operations.

(d) Resin and gel coat application equipment cleaning operations.

(e) Carpet and fabric adhesive operations.

(f) ***

§ 63.5695 When must I comply with this subpart?

You must comply with the standards in this subpart by the compliance dates specified in Table 1 to this subpart.

Standards for Open Molding Resin and Gel Coat Operations

§ 63.5698 Emission limit for open molding resin and gel coat operations

(a) You must limit organic HAP emissions from the five open molding operations listed in paragraphs (a)(1) through (5) of this section to the emission limit specified in paragraph (b) of this section. Operations listed in paragraph (d) are exempt from this limit.

(1) Production resin.

(2) Pigmented gel coat.

(3) Clear gel coat.

(4) Tooling resin.

(5) Tooling gel coat.

(b) You must limit organic HAP emissions from open molding operations to the limit specified by equation 1 of this section, based on a 12-month rolling average.

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

Where:

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

MR = mass of production resin used in the past 12 months, excluding any materials exempt under paragraph (d) of this section, megagrams.

MPG = mass of pigmented gel coat used in the past 12 months, excluding any materials exempt under paragraph (d) of this section, megagrams.

MCG = mass of clear gel coat used in the past 12 months, excluding any materials exempt under paragraph (d) of this section, megagrams.

MTR = mass of tooling resin used in the past 12 months, excluding any materials exempt under paragraph (d) of this section, megagrams.

MTG = mass of tooling gel coat used in the past 12 months, excluding any materials exempt under paragraph (d) of this section, megagrams.

(c) The open molding emission limit is the same for both new and existing sources.

(d) The materials specified in paragraphs (d)(1) through (3) of this section are exempt from the open molding emission limit specified in paragraph (b) of this section.

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

(2) Pigmented, clear, and tooling gel coat used for part or mold repair and touch up. The total gel coat materials included in this exemption must not exceed 1 percent by weight of all gel coat used at the facility on a 12-month rolling-average basis. You must keep a record of the amount of gel coats used per month for which you are using this exemption and copies of calculations showing that the exempt amount does not exceed 1 percent of all gel coat used.

(3) Pure, 100 percent vinylester resin used for skin coats. This exemption does not apply to blends of vinylester and polyester resins used for skin coats. The total resin materials included in the exemption cannot exceed 5 percent by weight of all resin used at the facility on a 12-month rolling-average basis. You must keep a record of the amount of 100 percent vinylester skin coat resin used per month that is eligible for this exemption and copies of calculations showing that the exempt amount does not exceed 5 percent of all resin used.

§ 63.5701 Options for complying with the open molding emission limit

You must meet the emission limit in § 63.5698 for the resins and gel coats used in open molding operations at the facility.

(a) Maximum achievable control technology (MACT) model point value averaging (emissions averaging) option.

(1) Demonstrate that emissions from the open molding resin and gel coat operations that you average meet the emission limit in § 63.5698 using the procedures described in § 63.5710. Compliance with this option is based on a 12-month rolling average.

(2) *****

(b) – (c)*****

§ 63.5704 General requirements for complying with the open molding emission limit

(a) *Emissions averaging option.* For those open molding operations and materials complying using the emissions averaging option, you must demonstrate compliance by performing the steps in paragraphs (a)(1) through (5) of this section.

(1) Use the methods specified in § 63.5758 to determine the organic HAP content of resins and gel coats.

(2) Complete the calculations described in § 63.5710 to show that the organic HAP emissions do not exceed the limit specified in § 63.5698.

(3) Keep records as specified in paragraphs (a)(3)(i) through (iv) of this section for each resin and gel coat.

(i) Hazardous air pollutant content.

(ii) Amount of material used per month.

(iii) 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.

(iv) Calculations performed to demonstrate compliance based on MACT model point values, as described in § 63.5710.

(4) Prepare and submit the implementation plan described in § 63.5707 to the Administrator and keep it up to date.

(5) Submit semiannual compliance reports to the Administrator as specified in § 63.5764.

§ 63.5707 Implementation plan for open molding operations and when to prepare one

(a) You must prepare an implementation plan for all open molding operations for which to comply by using the emissions averaging option described in § 63.5704(a).

(b) The implementation plan must describe the steps you will take to bring the open molding operations covered by this subpart into compliance. For each operation included in the emissions average, the implementation plan must include the elements listed in paragraphs (b)(1) through (3) of this section.

(1) A description of each operation included in the average.

(2) The maximum organic HAP content of the materials used, the application method used (if any atomized resin application methods are used in the average), and any other methods used to control emissions.

(3) Calculations showing that the operations covered by the plan will comply with the open molding emission limit specified in § 63.5698.

(c) You must submit the implementation plan to the Administrator with the notification of compliance status specified in § 63.5761.

(d) You must keep the implementation plan on site and provide it to the Administrator when asked.

(e) If you revise the implementation plan, you must submit the revised plan with the next semiannual compliance report specified in § 63.5764.

§ 63.5710 Demonstration of compliance using emissions averaging

(a) Compliance using the emissions averaging option is demonstrated on a 12-month rolling-average basis and is determined at the end of every month (12 times per year). The first 12-month rolling-average period begins on the compliance date specified in § 63.5695.

(b) At the end of the twelfth month after the compliance date and at the end of every subsequent month, use equation 1 of this section to demonstrate that the organic HAP emissions from those operations included in the average do not exceed the emission limit in § 63.5698 calculated for the same 12-month period. (Include terms in equation 1 of § 63.5698 and equation 1 of this section for only those operations and materials included in the average.)

$$\text{HAP emissions} = [(PV_R)(M_R)+(PV_{PG})(M_{PG})+(PV_{CG})(M_{CG})+(PV_{TR})(M_{TR})+(PV_{TG} (M_{TG})] \quad \text{(Eq 1)}$$

Where:

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

PV_R = Weighted-average MACT model point value for production resin used in the past 12 months, kilograms per megagram.

M_R = Mass of production resin 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.

(c) At the end of every month, use equation 2 of this section to compute the weighted-average MACT model point value for each open molding resin and gel coat operation included in the average.

$$PV_{OP} = \frac{\sum_{i=1}^{n} (Mi\ PVi)}{\sum_{i=1}^{n} (Mi)} \quad \text{(Eq.2)}$$

Where:

PV_{OP} = weighted-average MACT model point value for each open molding operation (PV_R, PV_{PG}, PV_{CG}, $PVPV_{TR}$, and $PVPV_{TG}$) included in the average, kilograms of HAP per megagram of material applied.

Mi =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.

PVi =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.

(d) You must use the equations in Table 3 to this subpart to calculate the MACT model point value (PVi) for each resin and gel coat used in each operation in the past 12 months.

(e) If the organic HAP emissions, as calculated in paragraph (b) of this section, are less than the organic HAP limit calculated in § 63.5698(b) for the same 12-month period, then you are in compliance with the emission limit in § 63.5698 for those operations and materials included in the average.

§ 63.5731 Standards for resin and gel coat mixing operations

(a) All resin and gel coat mixing containers with a capacity equal to or greater than 208 liters, including those used for on-site mixing of putties and polyputties, must have a cover with no visible gaps in place at all times.

(b) The work practice standard in paragraph (a) of this section does not apply when material is being manually added to or removed from a container, or when mixing or pumping equipment is being placed in or removed from a container.

(c) To demonstrate compliance with the work practice standard in paragraph (a) of this section, you must visually inspect all mixing containers subject to this standard at least once per month. The inspection should ensure that all containers have covers with no visible gaps between the cover and the container, or between the cover and equipment passing through the cover.

(d) You must keep records of which mixing containers are subject to this standard and the results of the inspections, including a description of any repairs or corrective actions taken.

§ 63.5734 Standards for resin and gel coat application equipment cleaning operations

(a) For routine flushing of resin and gel coat application equipment (e.g.,spray guns, flowcoaters, brushes, rollers,and squeegees), you must use a cleaning solvent that contains no more than 5 percent organic HAP by weight. For removing cured resin or gel coat from application equipment, no organic HAP content limit applies.

(b) You must store organic HAPcontaining solvents used for removing cured resin or gel coat in containers with covers. The covers must have no visible gaps and must be in place at all times, except when equipment to be cleaned is placed in or removed from the container. On containers with a capacity greater than 7.6 liters, the distance from the top of the container to the solvent surface must be no less than 0.75 times the diameter of the container. Containers that store organic HAPcontaining solvents used for

removing cured resin or gel coat are exempt from the requirements of 40 CFR part 63, subpart T. Cured resin or gel coat means resin or gel coat that has changed from a liquid to a solid.

§ 63.5737 Demonstration of compliance with the resin and gel coat application equipment cleaning standards

(a) Determine and record the organic HAP content of the cleaning solvents subject to the standards specified in § 63.5734 using the methods specified in § 63.5758.

(b) If you recycle cleaning solvents on site, you may use documentation from the solvent manufacturer or supplier or a measurement of the organic HAP content of the cleaning solvent as originally obtained from the solvent supplier for demonstrating compliance, subject to the conditions in § 63.5758 for demonstrating compliance with organic HAP content limits.

(c) At least once per month, you must visually inspect any containers holding organic HAP-containing solvents used for removing cured resin and gel coat to ensure that the containers have covers with no visible gaps. Keep records of the monthly inspections and any repairs made to the covers.

§ 63.5758 Determination of the organic HAP content of materials

(a) *Determine the organic HAP content for each material used.* To determine the organic HAP content for each material used in the open molding resin and gel coat operations, carpet and fabric adhesive operations, or aluminum recreational boat surface coating operations, you must use one of the options in paragraphs (a)(1) through (6) of this section.

(1) *Method 311 (appendix A to 40 CFR part 63).* You may use Method 311 for determining the mass fraction of organic HAP. Use the procedures specified in paragraphs (a)(1)(i) and (ii) of this section when determining organic HAP content by Method 311.

(i) Include in the organic HAP total each organic HAP that is measured to be present at 0.1 percent by mass or more for Occupational Safety and Health Administration (OSHA)-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and at 1.0 percent by mass or more for other compounds. For example, if toluene (not an OSHA carcinogen) is measured to be 0.5 percent of the material by mass, you do not need to include it in the organic HAP total. Express the mass fraction of each organic HAP you measure as a value truncated to four places after the decimal point (for example, 0.1234).

(ii) Calculate the total organic HAP content in the test material by adding up the individual organic HAP contents and truncating the result to three places after the decimal point (for example, 0.123).

(2) *Method 24 (appendix A to 40 CFR part 60).* You may use Method 24 to determine the mass fraction of nonaqueous volatile matter of aluminum coatings and use that value as a substitute for mass fraction of organic HAP.

(3) *ASTM D1259–85 (Standard Test Method for Nonvolatile Content of Resins).* You may use ASTM D1259–85 (available for purchase from ASTM) to measure the mass fraction of volatile matter of resins and gel coats for open molding operations and use that value as a substitute for mass fraction of organic HAP.

(4) *Alternative method.* You may use an alternative test method for determining mass fraction of organic HAP if you obtain prior approval by the Administrator. You must follow the procedure in § 63.7(f) to submit an alternative test method for approval.

(5) *Information from the supplier or manufacturer of the material.* You may rely on information other than that generated by the test methods specified in paragraphs (a)(1) through (4) of this section, such as manufacturer's formulation data, according to paragraphs (a)(5)(i) through (iii) of this section.

(i) Include in the organic HAP total each organic HAP that is present at 0.1 percent by mass or more for OSHA defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and at 1.0 percent by mass or more for other compounds. For example, if toluene (not an OSHA carcinogen) is 0.5 percent of the material by mass, you do not have to include it in the organic HAP total.

(ii) If the organic HAP content is provided by the material supplier or manufacturer as a range, then you must use the upper limit of the range for determining compliance. If a separate measurement of the total organic HAP content using the methods specified in paragraphs (a)(1) through (4) of this section exceeds

the upper limit of the range of the total organic HAP content provided by the material supplier or manufacturer, then you must use the measured organic HAP content to determine compliance.

(iii) If the organic HAP content is provided as a single value, you may assume the value is a manufacturing target value and actual organic HAP content may vary from the target value. If a separate measurement of the total organic HAP content using the methods specified in paragraphs (a)(1) through (4) of this section is less than 2 percentage points higher than the value for total organic HAP content provided by the material supplier or manufacturer, then you may use the provided value to demonstrate compliance. If the measured total organic HAP content exceeds the provided value by 2 percentage points or more, then you must use the measured organic HAP content to determine compliance.

(6) *Solvent blends.* Solvent blends may be listed as single components for some regulated materials in certifications provided by manufacturers or suppliers. Solvent blends may contain organic HAP which must be counted toward the total organic HAP content of the materials. When detailed organic HAP content data for solvent blends are not available, you may use the values for organic HAP content that are listed in Table 5 or 6 to this subpart. You may use Table 6 to this subpart only if the solvent blends in the materials you use do not match any of the solvent blends in Table 5 to this subpart and you know only whether the blend is either aliphatic or aromatic. However, if test results indicate higher values than those listed in Table 5 or 6 to this subpart, then the test results must be used for determining compliance.

§ 63.5761 Notifications to submit

(a) You must submit all of the notifications in Table 7 to this subpart that apply to you by the dates in the table. The notifications are described more fully in 40 CFR part 63, subpart A, General Provisions, referenced in Table 8 to this subpart.

(b) If you change any information submitted in any notification, you must submit the changes in writing to the Administrator within 15 calendar days after the change.

§ 63.5764 Reports to submit

(a) You must submit the applicable reports specified in paragraphs (b) through (e) of this section. To the extent possible, you must organize each report according to the operations covered by this subpart and the compliance procedure followed for that operation.

(b) Unless the Administrator has approved a different schedule for submission of reports under § 63.10(a), you must submit each report by the dates in paragraphs (b)(1) through (5) of this section.

(1) If your source is not controlled by an add-on control device (i.e., you are complying with organic HAP content limits, application equipment requirements, or MACT model point value averaging provisions), the first compliance report must cover the period beginning 12 months after the compliance date specified for the source in § 63.5695 and ending on June 30 or December 31, whichever date is the first date following the end of the first 12-month period after the compliance date that is specified for the source in § 63.5695.

(2) The first compliance report must be postmarked or delivered no later than 60 calendar days after the end of the compliance reporting period specified in paragraph (b)(1) of this section.

(3) Each subsequent compliance report must cover the applicable semiannual reporting period from January 1 through June 30 or from July 1 through December 31.

(4) Each subsequent compliance report must be postmarked or delivered no later than 60 calendar days after the end of the semiannual reporting period.

(5) For each affected source that is subject to permitting regulations pursuant to 40 CFR part 70 or 71, and if the permitting authority has established dates for submitting semiannual reports pursuant to 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), you may submit the first and subsequent compliance reports according to the dates the permitting authority has established instead of according to the dates in paragraphs (b)(1) through (4) of this section.

(c) The compliance report must include the information specified in paragraphs (c)(1) through (7) of this section.

(1) Company name and address.

(2) A statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the report.

(3) The date of the report and the beginning and ending dates of the reporting period.

(4) A description of any changes in the manufacturing process since the last compliance report.

(5) A statement or table showing, for each regulated operation, the applicable organic HAP content limit, application equipment requirement, or MACT model point value averaging provision with which you are complying. The statement or table must also show the actual weighted-average organic HAP content or weighted-average MACT model point value (if applicable) for each operation during each of the rolling 12-month averaging periods that end during the reporting period.

(6) If you were in compliance with the emission limits and work practice standards during the reporting period, you must include a statement to that effect.

(7) If you deviated from an emission limit or work practice standard during the reporting period, you must also include the information listed in paragraphs (c)(7)(i) through (iv) of this section in the semiannual compliance report.

(i) A description of the operation involved in the deviation.

(ii) The quantity, organic HAP content, and application method (if relevant) of the materials involved in the deviation.

(iii) A description of any corrective action you took to minimize the deviation and actions you have taken to prevent it from happening again.

(iv) A statement of whether or not the facility was in compliance for the 12-month averaging period that ended at the end of the reporting period.

§ 63.5767 Record keeping

The Permittee must keep the records specified in paragraphs (a) through (d) of this section in addition to records specified in individual sections of this subpart.

(a) The Permittee must keep a copy of each notification and report that you submitted to comply with this subpart.

(b) The Permitee must keep all documentation supporting any notification or report that are submitted.

(c) If your facility is not controlled by an add-on control device (i.e., you are complying with organic HAP content limits, application equipment requirements, or MACT model point value averaging provisions), the Permitee must keep the records specified in paragraphs (c)(1) through (3) of this section.

(1) The total amounts of open molding production resin, pigmented gel coat, clear gel coat, tooling resin, and tooling gel coat used per month and the weighted-average organic HAP contents for each operation, expressed as weightpercent. For open molding production resin and tooling resin, you must also record the amounts of each applied by atomized and nonatomized methods.

(2) ****

(3) ****

§ 63.5770 The form and length of time records must be kept

(a) Records must be readily available and in a form so they can be easily inspected and reviewed.

(b) Each record must be kept for 5 years following the date that it is generated.

(c) Each record must be kept on site for at least 2 years after the date that it is generated. Records can be kept offsite for the remaining 3 years.

(d) Records can be kept on paper or an alternative media, such as microfilm, computer, computer disks, magnetic tapes, or on microfiche.

§ 63.5773 What parts of the General Provisions apply to me?

You must comply with the requirements of the General Provisions in 40 CFR part 63, subpart A, as specified in Table 8 to this subpart.

§ 63.5776 Who implements and enforces this subpart?

(a) If the Administrator has delegated authority to your State or local agency, the State or local agency has the authority to implement and enforce this subpart.

(b) In delegating implementation and enforcement authority of this subpart to a State or local agency under 40 CFR part 63, subpart E, the authorities that are retained by the Administrator of the U.S. EPA and are not transferred to the State or local agency are listed in paragraphs (b)(1) through (4) of this section.

(1) Under Sec. 63.6(g), the authority to approve alternatives to the standards listed in paragraphs (b)(1)(i) through (vii) of this section is not delegated.

(i) Sec. 63.5698--Emission limit for open molding resin and gel coat operations.

(ii) Sec. 63.5728--Standards for closed molding resin operations.

(iii) Sec. 63.5731(a)--Standards for resin and gel coat mixing operations.

(iv) Sec. 63.5734--Standards for resin and gel coat application equipment cleaning operations.

(v) Sec. 63.5740(a)--Emission limit for carpet and fabric adhesive operations.

(vi) Sec. 63.5743--Standards for aluminum recreational boat surface coating operations.

(vii) Sec. 63.5746(g)--Approval of alternative means of demonstrating compliance with the emission limits for aluminum recreational boat surface coating operations.

(2) Under Sec. 63.7(e)(2)(ii) and (f), the authority to approve alternatives to the test methods listed in paragraphs (b)(2)(i) through (iv) of this section is not delegated.

(i) Sec. 63.5719(b)--Method for determining whether an enclosure is a total enclosure.

(ii) Sec. 63.5719(c)--Methods for measuring emissions from a control device.

(iii) Sec. 63.5725(d)(1)--Performance specifications for thermal oxidizer combustion temperature monitors.

(iv) Sec. 63.5758--Method for determining hazardous air pollutant content of regulated materials.

(3) Under Sec. 63.8(f), the authority to approve major alternatives to the monitoring requirements listed in Sec. 63.5725 is not delegated. A ``major alternative'' is defined in Sec. 63.90.

(4) Under Sec. 63.10(f), the authority to approve major alternatives to the reporting and recordkeeping requirements listed in Secs. 63.5764, 63.5767, and 63.5770 is not delegated. A ``major alternative'' is defined in Sec. 63.90.

§ 63.5779 What definitions apply to this subpart?

Terms used in this subpart are defined in the Clean Air Act, in Sec. 63.2, and in this section as follows:

Add-on control means an air pollution control device, such as a thermal oxidizer, that reduces pollution in an air stream by destruction or removal before discharge to the atmosphere.

Administrator means the Administrator of the United States Environmental Protection Agency (U.S. EPA) or an authorized representative (for example, a State delegated the authority to carry out the provisions of this subpart).

Aluminum recreational boat means any marine or freshwater recreational boat that has a hull or deck constructed primarily of aluminum. A recreational boat is a vessel which by design and construction is intended by the manufacturer to be operated primarily for pleasure, or to be leased, rented or chartered to another for the latter's pleasure (rather than for commercial or military purposes); and whose major structural components are fabricated and assembled in an indoor, production-line manufacturing plant or

similar land-side operation and not in a dry dock, graving dock, or marine railway on the navigable waters of the United States.

Aluminum recreational boat surface coating operation means the application of primers or top coats to aluminum recreational boats. It also includes the application of clear coats over top coats. Aluminum recreational boat surface coating operations do not include the application of wood coatings or antifoulant coatings to aluminum recreational boats.

Aluminum coating spray gun cleaning means the process of flushing or removing paints or coatings from the interior or exterior of a spray gun used to apply aluminum primers, clear coats, or top coats to aluminum recreational boats.

Aluminum wipedown solvents means solvents used to remove oil, grease, welding smoke, or other contaminants from the aluminum surfaces of a boat before priming or painting. Aluminum wipedown solvents contain no coating solids; aluminum surface preparation materials that contain coating solids are considered coatings for the purpose of this subpart and are not wipedown solvents.

Antifoulant coating means any coating that is applied to the underwater portion of a boat specifically to prevent or reduce the attachment of biological organisms and that is registered with EPA as a pesticide under the Federal Insecticide, Fungicide, and Rodenticide Act (7 U.S.C. section 136, et seq.). For the purpose of this subpart, primers used with antifoulant coatings to prepare the surface to accept the antifoulant coating are considered antifoulant coatings.

Assembly adhesive means any chemical material used in the joining of one fiberglass, metal, foam, or wood parts to another to form a temporary or permanently bonded assembly. Assembly adhesives include, but are not limited to, methacrylate adhesives and putties made from polyester or vinylester resin mixed with inert fillers or fibers.

Atomized resin application means a resin application technology in which the resin leaves the application equipment and breaks into droplets or an aerosol as it travels from the application equipment to the surface of the part. Atomized resin application includes, but is not limited to, resin spray guns and resin chopper spray guns.

Boat means any type of vessel, other than a seaplane, that can be used for transportation on the water.

Boat manufacturing facility means a facility that manufactures the hulls or decks of boats from fiberglass or aluminum or assembles boats from premanufactured hulls and decks, or builds molds to make fiberglass hulls or decks. A facility that manufactures only parts of boats (such as hatches, seats, or lockers) or boat trailers, but no boat hulls or decks or molds for fiberglass boat hulls or decks, is not considered a boat manufacturing facility for the purpose of this subpart.

Carpet and fabric adhesive means any chemical material that permanently attaches carpet, fabric, or upholstery to any surface of a boat.

Clear gel coat means gel coats that are clear or translucent so that underlying colors are visible. Clear gel coats are used to manufacture parts for sale. Clear gel coats do not include tooling gel coats used to build or repair molds.

Closed molding means any molding process in which pressure is used to distribute the resin through the reinforcing fabric placed between two mold surfaces to either saturate the fabric or fill the mold cavity. The pressure may be clamping pressure, fluid pressure, atmospheric pressure, or vacuum pressure used either alone or in combination. The mold surfaces may be rigid or flexible. Closed molding includes, but is not limited to, compression molding with sheet molding compound, infusion molding, resin injection molding (RIM), vacuum-assisted resin transfer molding (VARTM), resin transfer molding (RTM), and vacuum-assisted compression molding. Processes in which a closed mold is used only to compact saturated fabric or remove air or excess resin from the fabric (such as in vacuum bagging), are not considered closed molding. Open molding steps, such as application of a gel coat or skin coat layer by conventional open molding prior to a closed molding process, are not closed molding.

Cured resin and gel coat means resin or gel coat that has been polymerized and changed from a liquid to a solid.

Deviation means any instance in which an affected source subject to this subpart or an owner or operator of such a source:

(1) Fails to meet any requirement or obligation established by this subpart, including, but not limited to, any emission limit, operating limit, or work practice requirement;

(2) Fails to meet any term or condition which is adopted to implement an applicable requirement in this subpart and which is included in the operating permit for any affected source required to obtain such permit; or

(3) Fails to meet any emission limit, operating limit, or work practice requirement in this subpart during any startup, shutdown, or malfunction, regardless of whether or not such failure is permitted by this subpart.

Enclosure means a structure, such as a spray booth, that surrounds a source of emissions and captures and directs the emissions to an add-on control device.

Fiberglass boat means a vessel in which either the hull or deck is built from a composite material consisting of a thermosetting resin matrix reinforced with fibers of glass, carbon, aramid, or other material.

Fiberglass hull and deck coatings means coatings applied to the exterior or interior surface of fiberglass boat hulls and decks on the completed boat. Polyester and vinylester resins and gel coats used in building fiberglass parts are not fiberglass hull and deck coatings for the purpose of this subpart.

Filled resin means a resin to which an inert material has been added to change viscosity, density, shrinkage, or other physical properties.

Gel coat means a thermosetting resin surface coating containing styrene (Chemical Abstract Service or CAS No. 100-42-5) or methyl methacrylate (CAS No. 80-62-6), either pigmented or clear, that provides a cosmetic enhancement or improves resistance to degradation from exposure to the elements. Gel coat layers do not contain any reinforcing fibers and gel coats are applied directly to mold surfaces or to a finished laminate.

Hazardous air pollutant or HAP means any air pollutant listed in, or pursuant to section 112(b) of the Clean Air Act.

Hazardous air pollutant content or HAP content means the amount of HAP contained in a regulated material at the time it is applied to the part being manufactured. If no HAP is added to a material as a thinner or diluent, then the HAP content is the same as the HAP content of the material as purchased from the supplier. For resin and gel coat, HAP content does not include any HAP contained in the catalyst added to the resin or gel coat during application to initiate curing.

Hazardous air pollutant data sheet (HDS) means documentation furnished by a material supplier or an outside laboratory to provide the organic HAP content of the material by weight, measured using an EPA Method, manufacturer's formulation data, or an equivalent method. For aluminum coatings, the HDS also documents the solids content by volume, determined from the manufacturer's formulation data. The purpose of the HDS is to help the affected source in showing compliance with the organic HAP content limits contained in this subpart. The HDS must state the maximum total organic HAP concentration, by weight, of the material. It must include any organic HAP concentrations equal to or greater than 0.1 percent by weight for individual organic HAP that are carcinogens, as defined by the Occupational Safety and Health Administration Hazard Communication Standard (29 CFR part 1910), and 1.0 percent by weight for all other individual organic HAP, as formulated. The HDS must also include test conditions if EPA Method 311 is used for determining organic HAP content. Maximum achievable control technology (MACT) model point value means a number calculated for open molding operations that is a surrogate for emissions and is used to determine if your open molding operations are in compliance with the provisions of this subpart. The units for MACT model point values are kilograms of organic HAP per megagram of resin or gel coat applied.

Manufacturer's certification means documentation furnished by a material supplier that shows the organic HAP content of a material and includes a HDS.

Mold means the cavity or surface into or on which gel coat, resin, and fibers are placed and from which finished fiberglass parts take their form.

Mold sealing and release agents means materials applied to a mold to seal, polish, and lubricate the mold to prevent parts from sticking to the mold. Mold sealers, waxes, and glazing and buffing compounds are considered mold sealing and release agents for the purposes of this subpart.

Mold stripping and cleaning solvents means materials used to remove mold sealing and release agents from a mold before the mold surface is repaired, polished, or lubricated during normal mold maintenance.

Month means a calendar month.

Neat resin means a resin to which no filler has been added.

Nonatomized resin application means any application technology in which the resin is not broken into droplets or an aerosol as it travels from the application equipment to the surface of the part. Nonatomized resin application technology includes, but is not limited to, flowcoaters, chopper flowcoaters, pressure fed resin rollers, resin impregnators, and hand application (for example, paint brush or paint roller).

Open molding resin and gel coat operation means any process in which the reinforcing fibers and resin are placed in the mold and are open to the surrounding air while the reinforcing fibers are saturated with resin. For the purposes of this subpart, open molding includes operations in which a vacuum bag or similar cover is used to compress an uncured laminate to remove air bubbles or excess resin, or to achieve a bond between a core material and a laminate.

Pigmented gel coat means opaque gel coats used to manufacture parts for sale. Pigmented gel coats do not include tooling gel coats used to build or repair molds.

Production resin means any resin used to manufacture parts for sale. Production resins do not include tooling resins used to build or repair molds, or assembly adhesives as defined in this section.

Recycled resin and gel coat application equipment cleaning solvent means cleaning solvents recycled on-site or returned to the supplier or another party to remove resin or gel coat residues so that the solvent can be reused.

Research and development activities means:

(1) Activities conducted at a laboratory to analyze air, soil, water, waste, or product samples for contaminants, environmental impact, or quality control;

(2) Activities conducted to test more efficient production processes or methods for preventing or reducing adverse environmental impacts, provided that the activities do not include the production of an intermediate or final product for sale or exchange for commercial profit, except in a de minimis manner; and

(3) Activities conducted at a research or laboratory facility that is operated under the close supervision of technically trained personnel, the primary purpose of which is to conduct research and development into new processes and products and that is not engaged in the manufacture of products for sale or exchange for commercial profit, except in a de minimis manner.

Resin means any thermosetting resin with or without pigment containing styrene (CAS No. 100-42-5) or methyl methacrylate (CAS No. 80-62-6) and used to encapsulate and bind together reinforcement fibers in the construction of fiberglass parts.

Resin and gel coat application equipment cleaning means the process of flushing or removing resins and gel coats from the interior or exterior of equipment that is used to apply resin or gel coat in the manufacture of fiberglass parts.

Resin and gel coat mixing operation means any operation in which resin or gel coat, including the mixing of putties or polyputties, is combined with additives that include, but are not limited to, fillers, promoters, or catalysts.

Roll-out means the process of using rollers, squeegees, or similar tools to compact reinforcing materials saturated with resin to remove trapped air or excess resin.

Skin coat is a layer of resin and fibers applied over the gel coat to protect the gel coat from being deformed by the next laminate layers.

Tooling resin means the resin used to build or repair molds (also known as tools) or prototypes (also known as plugs) from which molds will be made.

Tooling gel coat means the gel coat used to build or repair molds (also known as tools) or prototypes (also known as plugs) from which molds will be made.

Vacuum bagging means any molding technique in which the reinforcing fabric is saturated with resin and then covered with a flexible sheet that is sealed to the edge of the mold and where a vacuum is applied under the sheet to compress the laminate, remove excess resin, or remove trapped air from the laminate during curing. Vacuum bagging does not include processes that meet the definition of closed molding.

Vinylester resin means a thermosetting resin containing esters of acrylic or methacrylic acids and having double-bond and ester linkage sites only at the ends of the resin molecules.

Volume fraction of coating solids means the ratio of the volume of coating solids (also known as volume of nonvolatiles) to the volume of coating; liters of coating solids per liter of coating.

Wood coatings means coatings applied to wooden parts and surfaces of boats, such as paneling, cabinets, railings, and trim. Wood coatings include, but are not limited to, primers, stains, sealers, varnishes, and enamels. Polyester and vinylester resins or gel coats applied to wooden parts to encapsulate them or bond them to other parts are not wood coatings.

Table 1 to Subpart VVVV—Compliance Dates for New and Existing Boat Manufacturing Facilities

As specified in § 63.5695, you must comply by the dates in the following table:

If your facility is -	And	Then you must comply by this date -
2. An existing or new area source	Becomes a major source after August 22, 2001	[1] year after becoming a major source or August 22, 2002, whichever is later

[1]Your facility is a major source if it is a stationary source or group of stationary sources located within a contiguous area and under common control that emits or can potentially emit, considering controls, in the aggregate, 9.1 megagrams or more per year of a single hazardous air pollutant or 22.7 megagrams or more per year of a combination of hazardous air pollutants.

Table 2 to Subpart VVVV--Alternative Organic HAP Content Requirements for Open Molding Resin and Gel Coat Operations

As specified in Secs. 63.5701(b), 63.5704(b)(2), and 63.5713(a), (b), and (d), you must comply with the requirements in the following table:

For this operation--	And this applicaton method--	You must not exceed this weighted-average organic HAP content (weight percent) requirement--
1. Production resin operations	Atomized (spray)	28 percent
2. Production resin operations	Nonatomized (nonspray)	35 percent
3. Pigmented gel coat operations	Any method	33 percent
4. Clear gel coat operations	Any method	48 percent
5. Tooling resin operations	Atomized (spray)	30 percent
6. Tooling resin operations	Nonatomized (nonspray)	30 percent
7. Tooling gel coat operations	Any method	40 percent

Table 3 to Subpart VVVV—MACT Model Point Value Formulas for Open Molding Operations

As specified in §§ 63.5710(d) and 63.5714(a), you must calculate point values using the formulas in the following table:

For this operation—	And this application method—	Use this formula to calculate the MACT model plant value for each resin and gel coat—
1. Production resin, tooling resin.....	a. Atomized ..... b. Atomized, plus vacumm bagging with roll-out ..... c. Atomized, plus vacuum bagging without roll-out d. Nonatomized ..... e. Nonatomized, plus vaccum bagging with roll-out f. Nonatomized, plus vacuum bagging without rollout.	$0.014 \cdot (\text{Resin HAP\%})^{2.425}$ $0.01185 \cdot (\text{Resin HAP\%})^{2.425}$ $0.00945 \cdot (\text{Resin HAP\%})^{2.425}$ $0.014 \cdot (\text{Resin HAP\%})^{2.275}$ $0.0110 \cdot (\text{Resin HAP\%})^{2.275}$ $0.0076 \cdot (\text{Resin HAP\%})^{2.275}$

2. Pigmented gel coat, clear gel coat, tooling gel coat	All methods.....	0.445 · (Gel coat HAP%) $^{1.675}$

Table 5 to Subpart VVVV—Default Organic HAP Contents of Solvents and Solvent Blends

As specified in § 63.5758(a)(6), when detailed organic HAP content data for solvent blends are not available, you may use the values in the following table:

Solvent/solvent blend	CAS No.	Average organic HAP content, percent by mass	Typical organic HAP, percent by mass
1. Toluene	108–88–3	100	Toluene.
2. Xylene (s).....	1330–20–7	100	Xylenes, ethylbenzene
3. Hexane	110–54–3	50	n-hexane.
4. n-hexane.....	110–54–3	100	n-hexane.
5. Ethylbenzene	100–41–4	100	Ethylbenzene.
6. Aliphatic 140	……..	0	None.
7. Aromatic 100	……..	2	1% xylene, 1% cumene.
8. Aromatic 150	……..	9	Naphthalene.
9. Aromatic naptha	64742–95–6	2	1% xylene, 1% cumene.
10. Aromatic solvent	64742–94–5	10	Naphthalene.
11. Exempt mineral spirits…….	8032–32–4	0	None
12. Ligroines (VM & P) .	8032–32–4	0	None.
13. Lactol spirits ….....	64742–89–6	15	Toluene.
14. Low aromatic white spirit	64742–82–1	0	None.
15. Mineral spirits	64742–88–7	1	Xylenes.
16. Hydrotreated naphtha	64742–48–9	0	None
17. Hydrotreated light distillate	64742–47–8	0.1	Toluene
18. Stoddard solvent ….....	8052–41–3	1	Xylenes.
19. Super high-flash naphtha	64742–95–6	5	Xylenes.
20. Varol® solvent ….....	8052–49–3	1	0.5% xylenes, 0.5% ethyl benzene.
21. VM & P naphtha ….....	64742–89–8	6	3% toluene, 3% xylene.
22. Petroleum distillate mixture ...	68477–31–6	8	4% naphthalene, 4% biphenyl.

Table 6 to Subpart VVVV--Default Organic HAP Contents of Petroleum Solvent Groups

As specified in Sec. 63.5758(a)(6), when detailed organic HAP content data for solvent blends are not available, you may use the values in the following table:

Solvent type	Average organic HAP content, percent by mass	Typical organic HAP, percent by mass
Aliphatic (Mineral Spirits 135, Mineral Spirits 150 EC, Naphtha, Mixed Hydrocarbon, Aliphatic Hydrocarbon, Aliphatic Naptha, Naphthol Spirits, Petroleum Spirits, Petroleum Oil, Petroleum Naphtha, Solvent Naphtha, Solvent Blend.).	3	1% Xylene, 1% Toluene, and 1% Ethylbenzene.
Aromatic (Medium-flash Naphtha, High-flash Naphtha, Aromatic Naphtha, Light Aromatic Naphtha, Light Aromatic Hydrocarbons, Aromatic Hydrocarbons, Light Aromatic Solvent.).	6	4% Xylene, 1% Toluene, and 1% Ethylbenzene

Table 7 to Subpart VVVV--Applicability and Timing of Notifications

As specified in Sec. 63.5761(a), you must submit notifications according to the following table:

If your facility	You must submit	By this date
1. Is an existing source subject to this subpart	An initial notification containing the information specified in Sec. 63.9(b)(2).	No later than the dates specified in Sec. 63.9(b)(2).
2. Is a new source subject to this subpart	The notification specified in 63.9(b) (3) to (5).	No later than the dates specified in Sec. 63.9(b)(4) and (5).
3. Qualifies for a compliance extensio specified in Sec. 63.9(c). n as	A request for a compliance extension as specified in Sec. 63.9(c)	No later than the dates specified in Sec. 63.6(i).
4. Is complying with organic HAP content limits, application equipment	A notification of compliance status as specified in Sec. 63.9(h).	No later than 30 calendar days after the end of the first 12-month averaging period

requirements; or MACT model point value averaging provisions.		after your facility's compliance date.
5. Is complying by using an add-on control device	a. notification of intent to conduct a date specified in performance test as specified in Sec. 63.9(e). b. A notification of the date for the continuous monitoring system performance evaluation as specified in Sec. 63.9(g). c. A notification of compliance status as specified in Sec. 63.9(h).	No later than the date specified in Sec. 63.9(e). With the notification of intent to conduct a performance test. No later than 60 calendar days after the completion of the add-on control device performance test and continuous monitoring system performance evaluation.

D.1.15 Notification Requirements for Fiberglass Boat Manufacturing Facilities [40 CFR 63 Subpart VVVV]

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

(a) The Permittee complying with organic HAP content limits, compliance status application equipment requirements; or MACT model point value averaging provisions shall submit a notification of compliance status as specified in 40 CFR 63.9(h) no later than 30 calendar days after August 22, 2004.

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

(c) The first compliance report must cover the period beginning 12 months after August 22, 2004 and ending on December 31, 2005. The first compliance report shall be postmarked or delivered no later than 60 calendar days after the end of the compliance reporting period specified above. Each subsequent compliance report shall cover the applicable semiannual reporting period from January 1 through June 30 and from July 1 through December 31. Each subsequent compliance report shall be postmarked or delivered no later than 60 calendar days after the end of the semiannual reporting period.

SECTION D.2 FACILITY OPERATION CONDITIONS

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

Insignificant Activities

(a) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as bag filter or cyclone, consisting of cut/trim, grinding, machining and wood working equipment, controlled with baghouses BH1 and BH2, and exhausting inside the building. [326 IAC 6-3-2]

(c) Other activities or categories not previously identified with emissions below insignificant thresholds, consisting of a wood/plastic working shop, controlled with baghouse BH3, and exhausting to stack 17. [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.2.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the particulate from the insignificant cut/trim, grinding, machining and wood working equipment, and the insignificant wood/plastic working shop shall not exceed E as shown in the following formula:

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

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

Compliance Determination Requirements

D.2.2 Particulate Control

In order to comply with Condition D.2.1, the baghouses for particulate control (BH1, BH2, and BH3) shall be in operation at all times when the insignificant cut/trim, grinding, machining and wood working equipment, and the insignificant wood/plastic working shop are in operation.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

PART 70 OPERATING PERMIT
CERTIFICATION

Source Name: Thunderbird Products
Source Address: 2200 West Monroe Street, Decatur, Indiana 46733
Mailing Address: 2200 West Monroe Street, Decatur, Indiana 46733
Part 70 Permit No.: T001-18296-00031

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
Indianapolis, Indiana 46204-2251
Phone: 317-233-0178
Fax: 317-233-6865

PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT

Source Name: Thunderbird Products
Source Address: 2200 West Monroe Street, Decatur, Indiana 46733
Mailing Address: 2200 West Monroe Street, Decatur, Indiana 46733
Part 70 Permit No.: T001-18296-00031

This form consists of 2 pages **Page 1 of 2**

☐ This is an emergency as defined in 326 IAC 2-7-1(12)

- The Permittee must notify the Office of Air Quality (OAQ), within four (**4**) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
- The Permittee must submit notice in writing or by facsimile within two (**2**) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16.

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

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

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

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

Part 70 Quarterly Report
BACT Limit

Source Name: Thunderbird Products
Source Address: 2200 West Monroe Street, Decatur, Indiana 46733
Mailing Address: 2200 West Monroe Street, Decatur, Indiana 46733
Part 70 Permit No.: T001-18296-00031
Facility: Assembly, subassembly, upholstery area (AU1)
Parameter: Volatile Organic Compounds (VOC)
Limit:
(1) The VOC content of the adhesives and sealants applied shall not exceed 9.5 pounds per gallon less water.
(2) The total VOC input to the assembly, subassembly, upholstery area operations, including any cleanup solvents, shall not exceed 55.9 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR:

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

☐ No deviation occurred in this quarter.

☐ Deviation/s occurred in this quarter.
Deviation has been reported on:

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

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report
VOC Emissions Limit

Source Name: Thunderbird Products
Source Address: 2200 West Monroe Street, Decatur, Indiana 46733
Mailing Address: 2200 West Monroe Street, Decatur, Indiana 46733
Part 70 Permit No.: T001-18296-00031
Facility: Significant emission units (GSB4, GSB5, GSB6, STB 1 through STB24, SB1 through SB9, AV2 through AV9, and AU1) and insignificant closed molding activities.
Parameter: Volatile Organic Compounds (VOC)
Limit: Less than 244 tons per twelve month consecutive period, with compliance determined at the end of each month. VOC emissions for gel coats, resins and catalysts shall be calculated by multiplying the usage of each gel coat, resin and catalyst by the emission factor that is appropriate for the monomer content, method of application, and other emission reduction techniques for each gel coat, resin, and catalyst, using the emission factors in "Unified Emission Factors for Open Molding of Composites", July 23, 2001, or its updates.

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: Thunderbird Products
Source Address: 2200 West Monroe Street, Decatur, Indiana 46733
Mailing Address: 2200 West Monroe Street, Decatur, Indiana 46733
Part 70 Permit No.: T001-18296-00031

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

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".

☐ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

☐ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

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

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

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Quality

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

Source Background and Description

Source Name:	Thunderbird Products
Source Location:	2200 West Monroe Street, Decatur, Indiana 46733
County:	Adams
SIC Code:	3732
Operation Permit No.:	T001-18296-00031
Permit Reviewer:	ERG/ST

On September 26, 2006, the Office of Air Quality (OAQ) had a notice published in the Decatur Daily Democrat, Decatur, Indiana, stating that Thunderbird Products had applied for a Part 70 Operating Permit Renewal to operate a stationary fiberglass boat manufacturing and repair facility with control. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On September 13, 2006, Thunderbird Products submitted comments on the proposed Part 70 Operating Permit Renewal. The summary of the comments follows. Text with a line through it has been deleted and bold text has been added. The Table of Contents has been updated as necessary.

Comment 1: The facility name should be changed from "Thunderbird Products, Inc." to "Thunderbird Products" throughout the permit.

IDEM Response to Comment 1: The title page, header and five (5) reporting forms in the permit have been changed as follows:

PART 70 OPERATING PERMIT RENEWAL
OFFICE OF AIR QUALITY

Thunderbird Products~~, Inc.~~
2200 West Monroe Street
Decatur, Indiana 46733

Source Name: Thunderbird Products~~, Inc.~~
Source Address: 2200 West Monroe Street, Decatur, Indiana 46733
Mailing Address: 2200 West Monroe Street, Decatur, Indiana 46733
Part 70 Permit No.: T001-18296-00031

Comment 2: The natural gas-fired combustion sources, including space heaters, gel coat booth heaters and air make-up units, should be listed with the insignificant activities in Section A.3 of the permit**.**

IDEM Response to Comment 2: Section A.3 **-** Specifically Regulated Insignificant Activities lists those insignificant activities to which specifically applicable regulations apply. The natural gas-fired space heaters, spray booth heaters and air make-up units are listed in the TSD but not Section A.3 of the permit because there are no specifically applicable regulations for these emission units. No changes have been made as a result of this comment.

Comment 3: Condition D.1.10 should specifically identify the specific emission units and associated stack ID #s in order to clarify which booths/stacks are required to perform compliance monitoring activities.

IDEM Response to Comment 3: For clarification, the permit has been changed as follows:

D.1.10 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters **controlling particulate emissions from the gelcoat, resin and foam fill, gel coat/resin, paint spray, and lamination and foam fill operations (GSB4, GSB5, GSB6, STB1 through STB24, SB1 through SB9, and AV2 through AV9).** To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the gel coat, resin **and foam fill, gel coat/resin, paint spray, and lamination and foam fill** ~~coating, and surface coating~~ booth stacks **(10, 11, 12, 13, 14, 15, 16, 27, 28, 29, 20, 31, 32, 36, 37, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54, 18, 19, 20, 21, 22, 33, 34, 35, 41, 3, 4, 5, 6, 7, 8, 9, and 38)** while one or more of the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

Comment 4: In 2006, the existing area vents AV7, AV8, and AV9 were relocated. Please reference a 2006 construction date for these three area vents.

IDEM Response to Comment 4: Relocating existing permitted equipment or a vent within the plant does not constitute a "reconstruction" or "modification". Therefore, no change in the description is warranted. No changes will be made as a result of this comment.

Comment 5: An assembly area for small parts has been relocated to the new plant expansion area on the east side of the facility. This assembly area is part of the overall assembly and subassembly operation identified as AU1 in Section A.2(g) of the draft renewal permit. The emissions will be included as part of the overall 244 tons per year VOC emission limit for the entire facility. This operation was not specifically identified as a new emission unit in SPM 001-22659-00031, issued on May 4, 2006 because this operation is an existing operation.

IDEM Response to Comment 5: This existing operation is part of AU1 and has been relocated within the plant. The VOC emissions will be counted under the source-wide VOC minor limit of 244 tons per year. The permit has been clarified as follows:

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

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

. . .

(g) One (1) assembly, subassembly, upholstery area, **including a small part assembly area,** identified as AU1, constructed in 2000, with a maximum capacity of 0.25 boats per hour, and exhausting inside the building.

. . .

Under the National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing (40 CFR 63, Subpart VVVV), the above listed emission units are considered to be existing boat manufacturing operations.

SECTION D.1 FACILITY OPERATION CONDITIONS

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

. . .

(g) One (1) assembly, subassembly, upholstery area, **including a small part assembly area,** identified as AU1, constructed in 2000, with a maximum capacity of 0.25 boats per hour, and exhausting inside the building.

. . .

Under the National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing (40 CFR 63, Subpart VVVV), the above listed emission units are considered to be existing boat manufacturing operations.

Comment 6: Thunderbird Products requests the following changes to the permit in regards to insignificant activities at their plant:

a. The gel coating booth GSB3 should be identified as an insignificant activity, as its potential to emit is similar to two existing insignificant mold repair booths (GSB1 and GSB2), identified in Section A.3(c)(2) as insignificant mold making and repair activities.

b. The Part 70 Quarterly Report form should specify that only VOC emissions from the significant emission units need be counted towards the 244 tons per year limit. Thunderbird Products has verified with IDEM in past permitting actions that insignificant activities are assumed to have potential VOC emissions less than five tons per year.

c. The facility's closed molding vacuum infusion process, added in August 2005, should be added to the list of insignificant activities with specifically applicable requirements (closed molding operations are subject to 40 CFR 63, Subpart VVVV, even though there are no specific requirements for demonstrating compliance with closed molding operations). The VOC emissions from the closed molding will be included in the source-wide VOC limit of 244 tons of VOC per year.

d. Please list the following insignificant activities in the permit. These processes operated in other areas of the plant under the existing Title V permit or are new insignificant activities permitted under SPM 001-22659-00031, issued on May 4, 2006. One (1) R&D Area for mold repair and mold preparation, one (1) enclosed cutout/trimming area equipped with an air filtering and internal recirculating system, one (1) booth for top dressing of gel coat on small parts, and one (1) booth for grinding, buffing, and touch up. Particulate emissions are controlled with dry filters. These activities will comply with the requirements of 40 CFR 63, Subpart VVVV.

IDEM Response to Comment 6:

In Comment (a), the Permittee stated that Gel coating booth GSB3 is used for mold repairs and its potential to emit of PM, PM10, VOC and HAP are at insignificant levels. This booth, and booths GSB1 and GSB2, have potential particulate emissions less than 0.551 pounds per hour and, pursuant to 326 IAC 6-3-1(b)(14), these booths are exempt from the requirements of 326 IAC 6-3-2. These booths remain subject to the requirements of 40 CFR 63, Subpart VVVV.

As stated in Comment (b), the combined PTE of VOC from the insignificant activities at this source, including space heaters, booth heaters, AMUs and the insignificant mold repair activities (GSB1, GSB2, GSB3) are less than 5 tons per year. Combined with the limited VOC emissions from the significant emission units (244 tons per year), the VOC emissions from the entire source are limited to less than 250 tons per year.

As requested in Comment (c), the facility's closed molding vacuum infusion process has been added to the list of insignificant activities, and the VOC emissions from the closed molding have been included in the source-wide VOC limit of 244 tons of VOC per year.

The addition of the R&D Area, cutout/trimming area, top dressing booth, and grinding/buffing/touch up booth to the list of insignificant emission units, as requested by the Permittee in Comment (d), does not result in an increase in potential to emit, as these are existing insignificant activities. The cutout/trimming area and grinding/buffing/touch up booth have potential particulate emissions greater than 0.551 pounds per hour. Therefore, these facilities are subject to the requirements of 326 IAC 6-3-2.

The permit and the quarterly reporting form for VOC emissions have been changed in response to the above comments as follows. IDEM has also added a statement of NESHAP applicability to the list of insignificant emission units subject to 40 CFR 63, Subpart VVVV.

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

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

~~(l) One (1) gel coating booth, identified as GSB3, constructed in 2006, with a maximum capacity of ten (10) boat molds per year, using dry filters as particulate control, and exhausting to vent 042.~~

Under the National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing (40 CFR 63, Subpart VVVV), the above listed emission units are considered to be existing boat manufacturing operations.

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

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

(c) Other activities or categories not previously identified with emissions below insignificant thresholds~~:~~ **, consisting of a**

~~(1) A~~ wood/plastic working shop, controlled with baghouse BH3, and exhausting to stack 17. [326 IAC 6-3-2]

(d) Activities or categories not previously identified, with emissions below insignificant thresholds, and subject to a NESHAP:

(~~2~~**1**) Mold making and repair activities using tooling resins and gelcoats**, consisting of gel coating booths GSB1, GSB2, and GSB3, constructed in 1988, 1988, and 2006, respectively, with a combined maximum capacity of thirty (30) boat molds per year, using dry filters as particulate control, and exhausting to vents 039, 040, and 042, respectively.** ~~[40 CFR 63, Subpart VVVV][326 IAC 20-48]~~

(~~3~~**2**) Use of organic peroxide catalysts in resin and gelcoat application areas. ~~[40 CFR 63, Subpart VVVV][326 IAC 20-48]~~

(~~4~~**3**) Return services limited to minor patching with gel resin and paint touch-up. ~~[40 CFR 63, Subpart VVVV][326 IAC 20-48]~~

(~~5~~**4**) Boat cavity foam filling operations. ~~[40 CFR 63, Subpart VVVV][326 IAC 20-48]~~

(5) One (1) insignificant closed molding vacuum infusion process, constructed in 2005, and exhausting inside the building.

(6) One (1) R&D Area for mold repair and mold preparation, one (1) enclosed cutout/trimming area equipped with an air filtering and internal recirculating system, one (1) booth for top dressing of gel coat on small parts, and one (1) booth for grinding, buffing, and touch up, with emissions controlled by dry filters and exhausting inside the building.

~~(d)~~ **(7)** Eight (8) storage tanks with capacity less than or equal to 1000 gallons and annual throughput less than 12,000 gallons. ~~[40 CFR 63, Subpart VVVV][326 IAC 20-48]~~

~~(e)~~ **(8)** Solvent recycling systems with batch capacity less than or equal to 100 gallons, consisting of three (3) Acetone recovery systems. ~~[40 CFR 63, Subpart VVVV][326 IAC 20-48]~~

Under the National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing (40 CFR 63, Subpart VVVV, 326 IAC 20-48), the above listed insignificant emission units are considered to be existing boat manufacturing operations.

SECTION D.1 FACILITY OPERATION CONDITIONS

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

(a) Three (3) gel coating booths, identified as ~~GSB3,~~ GSB4, GSB5, and GSB6, constructed in 1988, with a maximum capacity of 0.13 boats per hour per booth, using dry filters as particulate control, and exhausting to stacks ~~42,~~ 10, 11, and 12, respectively.

. . .

~~(l) One (1) gel coating booth, identified as GSB3, constructed in 2006, with a maximum capacity of ten (10) boat molds per year, using dry filters as particulate control, and exhausting to vent 042.~~

Under the National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing (40 CFR 63, Subpart VVVV), the above listed emission units are considered to be existing boat manufacturing operations.

Insignificant Activities

~~(c) Other activities or categories not previously identified with emissions below insignificant thresholds:~~

(d) Activities or categories not previously identified, with emissions below insignificant thresholds, and subject to a NESHAP:

(~~2~~**1**) Mold making and repair activities using tooling resins and gelcoats**, consisting of gel coating booths GSB1, GSB2, and GSB3, constructed in 1988, 1988, and 2006, respectively, with a combined maximum capacity of thirty (30) boat molds per year, using dry filters as particulate control, and exhausting to vents 039, 040, and 042, respectively.** ~~[40 CFR 63, Subpart VVVV][326 IAC 20-48]~~

(~~3~~**2**) Use of organic peroxide catalysts in resin and gelcoat application areas. ~~[40 CFR 63, Subpart VVVV][326 IAC 20-48]~~

(~~4~~**3**) Return services limited to minor patching with gel resin and paint touch-up. ~~[40 CFR 63, Subpart VVVV][326 IAC 20-48]~~

(~~5~~**4**) Boat cavity foam filling operations. ~~[40 CFR 63, Subpart VVVV][326 IAC 20-48]~~

(5) One (1) insignificant closed molding vacuum infusion process, constructed in 2005, and exhausting inside the building.

(6) One (1) R&D Area for mold repair and mold preparation, one (1) enclosed cutout/trimming area equipped with an air filtering and internal recirculating system, one (1) booth for top dressing of gel coat on small parts, and one (1) booth for grinding, buffing, and touch up, with emissions controlled by dry filters and exhausting inside the building.

~~(d)~~ **(7)** Eight (8) storage tanks with capacity less than or equal to 1000 gallons and annual throughput less than 12,000 gallons. ~~[40 CFR 63, Subpart VVVV][326 IAC 20-48]~~

~~(e)~~ **(8)** Solvent recycling systems with batch capacity less than or equal to 100 gallons, consisting of three (3) Acetone recovery systems. ~~[40 CFR 63, Subpart VVVV][326 IAC 20-48]~~

Under the National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing (40 CFR 63, Subpart VVVV, 326 IAC 20-48), the above listed insignificant emission units are considered to be existing boat manufacturing operations.

D.1.6 Particulate [326 IAC 6-3-2(d)] **[326 IAC 6-3-2]**

(a) Pursuant to T001-5903-00031, issued on October 14, 1999, SPM 001-16599-00031, issued on January 10, 2003, and 326 IAC 6-3-2(d), particulate from the gel coating booths, resin and foam filling booths, paint spray booths, and gel coating/resin application booths (~~GSB3,~~ GSB4, GSB5, GSB6, STB 1 through STB24, SB1 through SB9, and AV2 through AV9) shall be controlled by a dry particulate filter, and the Permittee shall operate the control devices in accordance with manufacturer's specifications.

(b) Pursuant to 326 IAC 6-3-2, the particulate from the insignificant cutout/trimming area and booth for grinding, buffing, and touchup shall not exceed E as shown in the following formula:

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

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

The Permittee shall operate the particulate filters for the insignificant cutout/trimming area and booth for grinding, buffing, and touchup when these facilities are in operation.

SECTION D.2 FACILITY OPERATION CONDITIONS

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

Insignificant Activities

(a) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as bag filter or cyclone, consisting of cut/trim, grinding, machining and wood working equipment, controlled with baghouses BH1 and BH2, and exhausting inside the building. [326 IAC 6-3-2]

(c) Other activities or categories not previously identified with emissions below insignificant thresholds~~:~~ **, consisting of a**

~~(1)~~ ~~A~~ wood/plastic working shop, controlled with baghouse BH3, and exhausting to stack 17. [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.)

The Part 70 Quarterly Report for VOC Emissions has been updated as follows:

. . .

Facility:	Significant emission units (~~GSB3,~~ GSB4, GSB5, GSB6, STB 1 through STB24, SB1 through SB9, AV2 through AV9, and AU1) and insignificant **closed molding** activities ~~(mold making, repair and catalysts)~~.
Parameter:	Volatile Organic Compounds (VOC)
Limit:	Less than 244 tons per twelve month consecutive period, with compliance determined at the end of each month. VOC emissions for gel coats, resins and catalysts shall be calculated by multiplying the usage of each gel coat, resin and catalyst by the emission factor that is appropriate for the monomer content, method of application, and other emission reduction techniques for each gel coat, resin, and catalyst, using the emission factors in “Unified Emission Factors for Open Molding of Composites”, July 23, 2001, or its updates.

Indiana Department of Environmental Management
Office of Air Quality

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

Source Background and Description

Source Name:	Thunderbird Products, Inc.
Source Location:	2200 West Monroe Street, Decatur, Indiana 46733
County:	Adams
SIC Code:	3732
Operation Permit No.:	T001-5903-00031
Operation Permit Issuance Date:	October 14, 1999
Permit Renewal No.:	T001-18296-00031
Permit Reviewer:	ERG/ST

The Office of Air Quality (OAQ) has reviewed a Part 70 Operating Permit Renewal application from Thunderbird Products, Inc. relating to the operation of a stationary fiberglass boat manufacturing and repair facility.

Permitted Emission Units and Pollution Control Equipment

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

(a) Three (3) gel coating booths, identified as GSB4, GSB5, and GSB6, constructed in 1988, with a maximum capacity of 0.13 boats per hour per booth, using dry filters as particulate control, and exhausting to stacks 10, 11, and 12, respectively.

(b) Four (4) resin and foam filling booths, identified as STB1, STB2, STB3, and STB4, constructed in 1988, with a maximum capacity of 0.005 boats per hour per booth, using dry filters as particulate control, and exhausting to stacks 13, 14, 15, and 16, respectively.

(c) Six (6) IMRON paint spray booths for coating fiberglass, identified as SB1, SB2, SB3, SB4, SB5, constructed in 1988, and SB9 constructed in 2005, with a maximum capacity of 0.078 boats per hour per booth, using dry filters as particulate control, and exhausting to stacks 18, 19, 20, 21, 22, and 41, respectively.

(d) Eight (8) lamination and foam filling areas, identified as AV2, AV3, AV4, AV5, AV6, AV7, AV8, and AV9, with AV2 through AV7 constructed in 1988, with AV8 constructed in 2000, with AV9 constructed in 2002, with a maximum capacity of 0.13 boats per hour per area, using dry filters as particulate control, and exhausting to stacks 3, 4, 5, 6, 7, 8, 9, and 38, respectively.

(e) Eight (8) booths for gel coating/resin applications, identified as STB5 through STB12, with STB7 through STB11 constructed in 2000, with STB5, STB6 and STB12 constructed in 2002, with a maximum capacity of 0.025 boats per hour per booth, using dry filters as particulate control, and exhausting to stacks 27, 28, 29, 30, 31, 32, 36, and 37, respectively.

(f) Three (3) paint spray booths for coating fiberglass, identified as SB6, SB7, and SB8, constructed in 2000, with a maximum capacity of 0.025 boats per hour per booth, using dry filters as particulate control, and exhausting to stacks 33, 34, and 35, respectively.

(g) One (1) assembly, subassembly, upholstery area, identified as AU1, constructed in 2000, with a maximum capacity of 0.25 boats per hour, and exhausting inside the building.

(h) Eight (8) gel coating/resin booths, identified as STB13 (exhausting to vent 043), STB14 (exhausting to vent 044), STB15 (exhausting to vent 045), STB16 (exhausting to vent 046), STB17 (exhausting to vent 047), STB18 (exhausting to vent 048), STB20 (exhausting to vent 050), and STB21 (exhausting to vent 051), constructed in 2006, with a maximum capacity of 0.0057 boat per hour per booth, using dry filters as particulate control.

(i) Two (2) gel coating/resin booths, identified as STB19 (exhausting to vent 049) and STB24 (exhausting to vent 054), constructed in 2006, with a maximum capacity of 0.02 boat per hour per booth, using dry filters as particulate control.

(j) One (1) gel coating/resin booth, identified as STB22, constructed in 2006, with a maximum capacity of 0.0125 boat per hour, using dry filters as particulate control, and exhausting to vent 052.

(k) One (1) gel coating/resin booth, identified as STB23, constructed in 2006, with a maximum capacity of 0.0167 boat per hour, using dry filters as particulate control, and exhausting to vent 053.

(l) One (1) gel coating booth, identified as GSB3, constructed in 2006, with a maximum capacity of ten (10) boat molds per year, using dry filters as particulate control, and exhausting to vent 042.

Under the National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing (40 CFR 63, Subpart VVVV), the above listed emission units are considered to be existing boat manufacturing operations.

Unpermitted Emission Units and Pollution Control Equipment

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

Insignificant Activities

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

(a) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as bag filter or cyclone, consisting of cut/trim, grinding, machining and wood working equipment, controlled with baghouses BH1 and BH2, and exhausting inside the building. [326 IAC 6-3-2]

(b) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]

(c) Other activities or categories not previously identified with emissions below insignificant thresholds:

(1) A wood/plastic working shop, controlled with baghouse BH3, and exhausting to stack 17. [326 IAC 6-3-2]

(2) Mold making and repair activities using tooling resins and gelcoats. [40 CFR 63, Subpart VVVV][326 IAC 20-48]

(3) Use of organic peroxide catalysts in resin and gelcoat application areas. [40 CFR 63, Subpart VVVV][326 IAC 20-48]

(4) Return services limited to minor patching with gel resin and paint touch-up. [40 CFR 63, Subpart VVVV][326 IAC 20-48]

(5) Boat cavity foam filling operations. [40 CFR 63, Subpart VVVV][326 IAC 20-48]

(d) Eight (8) storage tanks with capacity less than or equal to 1000 gallons and annual throughput less than 12,000 gallons. [40 CFR 63, Subpart VVVV][326 IAC 20-48]

(e) Solvent recycling systems with batch capacity less than or equal to 100 gallons, consisting of three (3) Acetone recovery systems. [40 CFR 63, Subpart VVVV][326 IAC 20-48]

(f) Brazing, cutting, soldering and welding equipment and activities not resulting in HAP emissions.

(g) Natural gas-fired combustion sources with heat input equal to or less than 10 MMBtu per hour each, consisting of fourteen space heaters, identified as H1 through H14, two (2) gel spray booth heaters, identified as SBH1 and SBH2, and five (5) natural gas-fired air make-up units, with a total rated capacity of 13.20 MMBTU/hr.

(h) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.

(i) Cleaners and solvents characterized as follows: a) having a vapor pressure equal to or less than 2.0 kPa measured at 38 degrees C; or b) having a vapor pressure equal to or less than 0.7 kPa measured at 20 degrees C.

(j) Closed loop heating and cooling systems.

(k) Heat exchanger cleaning and repair.

(l) Blowdown from compressors and pumps.

(m) Research and Development activities as defined in 326 IAC 2-7-1(21)(E).

Existing Approvals

The source has been operating under Operating Permit T001-5903-00031, issued on October 14, 1999, and the following approvals:

(a) Significant Permit Modification 001-11543-00031, issued September 18, 2000;

(b) First Significant Source Modification 001-11987-00031, issued on October 6, 2000;

(c) Administrative Amendment 001-11985-00031, issued on October 11, 2000;

(d) Reopening 001-13125-00031, issued on November 29, 2001;

(e) Minor Source Modification 001-15840-00031, issued on October 4, 2002;

(f) Review Request 001-16301-00031, issued on August 22, 2003;

(g) Second Significant Permit Modification 001-16599-00031, issued on January 10, 2003; and

(h) Third Significant Permit Modification 001-17374-00031, issued on August 15, 2003.

(i) First Minor Permit Modification 001-21331-00031, issued on August 17, 2005.

(j) Significant Source Modification 001-22370-00031, issued on April 13, 2006; and

(k) Significant Permit Modification 001-22659-00031, issued on May 4, 2006.

All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either incorporated as originally stated, revised, or deleted by this permit.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit renewal be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 permit renewal application for the purposes of this review was received on December 8, 2003.

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

Emission Calculations

See Appendix A of this document for detailed emission calculations (pages 1 through 8).

Potential to Emit of the Source

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

The source was issued a Part 70 Operating Permit on October 14, 1999. The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered enforceable only after issuance of the original Part 70 operating Permit and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

	Potential to Emit (tons/year)						
Process/emission unit	PM	PM-10	SO_2	VOC	CO	NO_X	HAPs
Gel Coat (GSB4, GSB5, GSB6)	15.8	15.8	0	Less than 244[(b)]	0	0	Single HAP: > 10 Combination of HAPs: > 25
Resin and Foam Filling (STB1, STB2, STB3, STB4)	0.44	0.44	0		0	0	
IMRON Paint Spray (SB1, SB2, SB3, SB4, SB5, SB6)	4.4	4.4	0		0	0	
Lamination and Foam Filling (AV2, AV3, AV4, AV5, AV6, AV7, AV8, AV9)	4.1	4.1	0		0	0	
Paint Spray (SB6, SB7, SB8)	0.40	0.40	0		0	0	
Gel Coating/Resin (STB7, STB8, STB9, STB10, STB11)	0.16	0.16	0		0	0	
Gel Coating/Resin (STB5, STB6, STB12)	0.16	0.16	0		0	0	
Assembly, Subassembly, Upholstery (AU1)	64.9	64.9	0		0	0	0.7
Gel Coating/Resin STB13 – STB24	0.45	0.45	0		0	0	Single HAP (styrene): 32.8

	Potential to Emit (tons/year)						
Process/emission unit	PM	PM-10	SO_2	VOC	CO	NO_X	HAPs
Gel Coat GSB3	0.50	0.50	0		0	0	Combination of HAPs: 34.3
Insignificant Mold-making	--	--	--		--	--	1.0
Insignificant Activities: Gas Heaters, Trimmers, Wood/plastic working shop	14.1	14.1	0.15	1.3	25.3	30.0	0.3
Total PTE	105[(a)]	105[(a)]	0.15	Less than 250	25.3	30.0	Single HAP: > 10 Combination of HAPs: > 25

"--" Emissions are negligible (less than 0.1 tons per year).
(a) The particulate emissions from the gel coat, resin, foam, lamination and spray coating operations are limited by 326 IAC 6-3-2.
(b) Pursuant to SPM 001-22659-00031, issued on May 4, 2006, the VOC emissions from the significant emission units are limited to less than 244 tons of VOC per year.

(a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of VOC and PM10 are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is equal to or greater than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(c) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2003 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	Not Reported
PM10	Not Reported
SO_2	Not Reported
VOC	135
CO	Not Reported
NO_x	Not Reported
HAP	Not Reported

County Attainment Status

The source is located in Adams County.

Pollutant	Status
PM10	Attainment
PM2.5	Attainment
SO_2	Attainment
NO_2	Attainment
8-hour Ozone	Attainment
CO	Attainment
Lead	Attainment

(a) Adams County has been classified as attainment for PM2.5. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM 2.5 emissions. Therefore, until the U.S.EPA adopts specific provisions for PSD review for PM2.5 emissions, it has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions. See the State Rule Applicability - Entire Source Section.

(b) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. Adams County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source Section.

(c) Adams County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source Section.

(d) An emergency rule adopted by the Air Pollution Control Board on Aug 2 was filed with the Legislative Services Agency. The emergency rule is effective August 7, 2006 and expires on November 1, 2006. It redesignates Delaware, Greene, Jackson, Vanderburgh, Vigo and Warrick Counties to Attainment for the 8 Hour Ozone Standard, redesignates Lake County to Attainment for Sulfur Dioxide and Revokes the 1 Hour Ozone Standard.

Part 70 Permit Conditions

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

(a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.

(b) Monitoring and related record keeping requirements which assure that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

(a) The requirements of Compliance Assurance Monitoring (CAM) (40 CFR 64) are not included in this permit. Pursuant to 40 CFR 64.2(b)(i), the emission units at this source are regulated under emission limitations or standards (NSPS or NESHAP) proposed by the Administrator after November 15, 1990.

(b) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in this permit.

(c) The source is subject to 40 CFR 63, Subpart VVVV (incorporated into 326 IAC 20-48) because it is a fiberglass boat manufacturing facility and is a major source of HAP. As an existing fiberglass boat manufacturing facility that is a major source of HAPs, the source must comply with the provisions of 40 CFR 63, Subpart VVVV on and after August 23, 2004. Pursuant to 40 CFR 63.5689, the affected source subject to 40 CFR 63, Subpart VVVV is the combination of all of the boat manufacturing operations listed in paragraphs (1) through (5) below.

(1) Open molding resin and gel coat operations (including pigmented gel coat, clear gel coat, production resin, tooling gel coat, and tooling resin).

(2) Closed molding resin operations.

(3) Resin and gel coat mixing operations.

(4) Resin and gel coat application equipment cleaning operations.

(5) Carpet and fabric adhesive operations.

The emissions units added under SPM 001-22659-00031, issued on May 4, 2006 (STB13-STB24, and GSB3), must comply with the requirements of the Boat Manufacturing NESHAP (40 CFR 63, Subpart VVVV, 326 IAC 20-48) immediately upon startup. The source is subject to the following portions of Subpart VVVV. Nonapplicable portions of the NESHAP will not be included in the permit.

1. 40 CFR 63.5689(a) through (e)
2. 40 CFR 63.5698
3. 40 CFR 63.5701(a)(1)
4. 40 CFR 63.5704 through 40 CFR 63.5710
5. 40 CFR 63.5731 through 40 CFR 63.5737
6. 40 CFR 63.5758(a)
7. 40 CFR 63.5761
8. 40 CFR 63.5764
9. 40 CFR 63.5767(a), (b), and (c)(1)
10. 40 CFR 63.5770
11. 40 CFR 63.5773
12. 40 CFR 63.5776
13. 40 CFR 63.5779

(d) The requirements of the National Emission Standards for Hazardous Air Pollutants: Surface Coating of Plastic Parts and Products (40 CFR 63, Subpart PPPP) are not included in this permit. Pursuant to 40 CFR 63.4481(c)(15) the requirements of 40 CFR 63, Subpart PPPP do not apply to sources that are subject to 40 CFR 63, Subpart VVVV and do not apply to post-mold surface coating of personal watercraft or parts of personal watercraft, as defined in 40 CFR 63.4581.

(e) The requirements of the National Emission Standards for Hazardous Air Pollutants: Reinforced Plastics Composites Production (40 CFR 63, Subpart WWWW and 326 IAC 20-56) are not included in this permit. Pursuant to 40 CFR 63.5787(b), sources that are subject to 40 CFR 63, Subpart VVVV and use all of the reinforced plastics composites manufactured onsite in manufacturing of fiberglass boats, are not subject to the requirements of 40 CFR 63, Subpart WWWW.

(f) The requirements of the National Emission Standards for Hazardous Air Pollutants: Shipbuilding and Ship Repair (40 CFR 63, Subpart II and 326 IAC 20-26) are not included in this permit. Pursuant to 40 CFR 63.781 and 40 CFR 63.782, this source is not subject to the requirements of 40 CFR 63, Subpart II because the marine vessels produced at this source do not meet the definition of a ship, as defined in 40 CFR 63.782. Pleasure craft are not considered to be ships and are therefore not subject to this subpart.

State Rule Applicability – Entire Source

326 IAC 1-5-2 (Emergency Reduction Plans)

The source submitted an Emergency Reduction Plan (ERP) on December 16, 1999.

326 IAC 2-2 (Prevention of Significant Deterioration)

This source is not in 1 of the 28 source categories and there are no applicable New Source Performance Standards that were in effect on August 7, 1980; therefore, fugitive emissions of PM and VOC are not counted towards applicability of PSD.

This source was constructed in 1987 under CP (01) 1658, issued on October 20, 1987. The original emission units included four (4) gel coating booths (GSB3, GSB4, GSB5, GSB6), four resin and foam filling booths (STB1, STB2, STB3, STB4), five IMRON paint spray booths (SB1, SB2, SB3, SB4, SB5), and six lamination and foam filling areas (AV2, AV3, AV4, AV5, AV6, AV7). In CP (01) 1658, issued on October 20, 1987, the Permittee took a source-wide emission limit of 20.83 tons of VOC per month, which is less than 250 tons of VOC per year. This limit made the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable to the 1987 initial construction of this source. The PTE for the entire source for PM, PM10, SO_2, NO_X, and CO before controls were all less than 250 tons per year. The source was a minor source under PSD due to the source-wide VOC limit.

The source was issued its original Title V operating permit T001-5903-00031 on October 14, 1999. Since the time of issuance of CP (01) 1658, the source removed gel coating booth GSB3. No new emission units were constructed or added in T001-5903-00031. The source retained the source-wide limit on VOC of 20.83 tons per month (249 tons per year).

Under Significant Permit Modification 001-11593-00031, issued on September 18, 2000, the source added one (1) lamination and foam filling area (AV8) and increased the maximum rates of production for the existing gel coat, resin, foam fill, paint spray and lamination operations. This modification did not trigger PSD review because the increases in PTE for VOC, PM and PM10 were less than 250 tons per year. Because the source retained the source-wide limit on VOC of 20.83 tons per month, the source remained a minor source under PSD after this modification.

Under Significant Source Modification 001-11987-00031, issued on October 6, 2000, the source added five (5) gel coat booths (STB7, STB8, STB9, STB10, STB11), and three paint spray booths (SB6, SB7, SB8). The source also redesignated one (1) insignificant assembly/subassembly upholstery area (AU1) as a significant emission unit. This modification did not trigger PSD review because the increases in PTE for VOC, PM and PM10 were less than 250 tons per year. The source retained the source-wide limit on VOC of 20.83 tons per month. Therefore, the source remained a minor source under PSD after this modification.

Under Administrative Amendment 001-11985-00031, issued on October 11, 2000, the source changed the terms of its PSD minor limit for VOC from 20.83 tons per month to less than 250 tons per twelve consecutive month period.

Under Minor Source Modification 001-15840-00031, issued on October 4, 2002, the source added three (3) gel coating/resin booths (STB5, STB6 and STB12). This modification did not trigger PSD review because the increases in PTE for VOC, PM and PM10 were less than 250 tons per year. The source retained the source-wide limit on VOC of less than 250 tons per twelve consecutive month period. The source remained a minor source under PSD after this modification.

Under Significant Permit Modification 001-16599-00031, issued on January 10, 2003, the source changed its permit to reflect the changes made in MSM 001-15840-00031. The permit also re-designated Vent AV9 (added in MSM 001-15840-00031) as one (1) lamination and foam filling area (AV9) and added it to the list of significant emission units. The source retained the source-wide limit on VOC of less than 250 tons per twelve consecutive month period. The source remained a minor source under PSD after this modification.

Under Significant Permit Modification 001-17374-00031, issued on August 15, 2003, the source accepted a PSD minor limit of less than 244 tons per twelve consecutive month period for the significant emission units (all gel coat, resin, foam fill, paint spray and lamination operations). The source also added two insignificant activities (mold making and peroxide catalyst) at this time. This modification did not trigger PSD review because the increase in PTE for VOC, PM and PM10 was less than 250 tons per year. The significant emission units were limited to emissions of 244 tons per year of VOC. Combined with the 5 tons of VOC emissions from the mold making, peroxide catalyst and gas heaters, the PTE for VOC for the entire source was limited to less than 250 tons per year. The source remained a minor source under PSD for VOC after this modification.

Under Significant Permit Modification 001-22659-00031, issued on May 4, 2006, the source added twelve (12) gel coating/resin booths (STB13-STB24) and one (1) gel coat booth (GSB3). This modification did not trigger PSD review because the increases in PTE for VOC, PM, and PM10 were less than 250 tons per year. The source modified their existing PSD Minor limit on VOC to include the new emission units. The source accepted a source-wide limit on VOC of 244 tons per year for all of the significant emission units. Therefore, the entire source will be limited to less than 250 tons of VOC emissions per twelve (12) consecutive month period. The source remained a minor source under PSD for VOC after this modification.

The uncontrolled PTE for PM, PM10, NOx, SO_2 and CO for the entire source are less than 250 tons per year.

The PSD limits for VOC included in this permit are as follows:

The total input of VOC to the significant emission units GSB3, GSB4, GSB5, GSB6, STB 1 through STB12, STB13 through STB24, SB1 through SB9, AV2 through AV9, AU1, and the insignificant mold making and catalyst shall be limited to less than 244 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. Combined with VOC emissions from the gas heaters and other insignificant emission units at this source, the source-wide emissions of VOC shall be limited to less than 250 tons per twelve (12) consecutive month period. This limit makes 326 IAC 2-2 not applicable to the 1987 construction of the source, SSM 001-11987-00031 and MSM 001-15840-00031, and makes the source minor under 326 IAC 2-2 for future modifications.

326 IAC 2-6 (Emission Reporting)

Since this source is required to have an operating permit under 326 IAC 2-7 (Part 70 Permit Program), this source is subject to 326 IAC 2-6 (Emission Reporting). In accordance with the compliance schedule in 326 IAC 2-6-3, an emission statement must be submitted triennially by July 1 beginning in 2007 and every 3 years after. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

326 IAC 5-1 (Opacity Limitations)

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

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

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

326 IAC 6-4 (Fugitive Dust Emissions)

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

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)

The source is located in Adams County.

(a) This source is not located in any of the areas listed in 326 IAC 6-5-1(a). Therefore, this source is not subject to the requirements of 326 IAC 6-5.

(b) This source did not receive all of the necessary preconstruction approvals prior to December 13, 1985. However, the fugitive particulate emissions from the paved and unpaved roads and parking lots are negligible. Pursuant to 326 IAC 6-5-7(d), this source is not subject to the requirements of 326 IAC 6-5.

326 IAC 8-6 (Organic Solvent Emission Limitations)

This source is not subject to the requirements of 326 IAC 8-6 (Organic Solvent Emission Limitations) because it was constructed after January 1, 1980.

326 IAC 2-4.1 (New Source Toxics Control)

(a) The gel coat/resin booths identified as STB5 through STB12 and the lamination and foam filling areas identified as AV8 and AV9* were constructed after July 27, 1997 and have potential to emit greater than 10 tons per year of a single HAP and greater than 25 tons per year of total HAPs. These units were subject to case-by-case MACT standards (see SSM 001-11987-00031, issued October 6, 2000, SSM 001-16599-00031, issued January 10, 2003, and SPM 001-17374-00031, issued August 15, 2003).

On August 22, 2001, EPA promulgated 40 CFR 63, Subpart VVVV (National Emission Standards for Hazardous Air Pollutants from Boat Manufacturing). As previously discussed in this document, the gel coat/resin booths are subject to the requirements of this NESHAP. Pursuant to 40 CFR 63.44 (Requirements for Constructed or Reconstructed Major Sources Subject to a Subsequently Promulgated MACT Standard or MACT Requirement), will no longer be required to comply with the case-by-case MACT requirements previously incorporated into the source's Part 70 permit, but will instead comply with all applicable requirements of 40 CFR 63, Subpart VVVV.

*These units were previously subject to the MACT requirements under 326 IAC 2-1-3.4. However, this rule was repealed on December 25, 1998. These units are now subject to the requirements of 40 CFR 63, Subpart VVVV.

(b) Although constructed after July 27, 1997, the assembly, subassembly, and upholstery area (identified as AU1) was not subject to the requirements of 326 IAC 2-4.1 because the potential to emit any single HAP was less than 10 tons per year and the potential to emit total HAPs was less than 25 tons per year.

(c) Although constructed after July 27, 1997, the paint spray booths (identified as SB6, SB7, and SB8) were not subject to the requirements of 326 IAC 2-4.1 because the potential to emit any single HAP was less than 10 tons per year and the potential to emit total HAPs was less than 25 tons per year.

(d) The gel coating booths (identified as GSB4, GSB5, and GSB6), resin and foam filling booths (identified as STB1, STB2, STB3, and STB4), IMRON paint spray booths (identified as SB1, SB2, SB3, SB4, and SB5), and lamination and foam filling areas (identified as AV2, AV3, AV4, AV5, AV6, and AV7) are not subject to the requirements of 326 IAC 2-4.1 because they were constructed prior to July 27, 1997.

(e) The gel coating/resin booths (identified as STB 13 through STB24 and the gel coating booth (identified as GSB3) were constructed after July 27, 1997 and will emit greater than ten (10) tons per year for a single HAP and greater than twenty-five (25) tons per year for a combination of HAPs. However, these emission units are specifically regulated by the Boat Manufacturing NESHAP, 40 CFR 63, Subpart VVVV. Therefore, the requirements of 326 IAC 2-4.1 do not apply.

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

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

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

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

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

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

(a) Nonatomizing spray equipment shall not be operated at pressures that atomize the material during the application process.

(b) Solvents sprayed during cleanup and resin changes shall be directed into solvent collection containers.

(c) For routine flushing of resin and gel coat application equipment, such as spray guns, flowcoaters, brushes, rollers, and squeegees, the Permittee shall use a cleaning solvent that contains no hazardous air pollutants (HAPs). However, recycled cleaning solvents that contain less than or equal to five percent (5%) HAP by weight are considered to contain no HAP for the purposes of this 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 HAPs.

(2) All production and tooling gel coats that contain HAPs.

(3) Waste resins and gel coats that contain HAPs.

(4) Cleaning materials, including waste cleaning materials.

(5) Other materials that contain HAPs.

(f) The covers of the closed containers must have no visible gaps and must be in place at all times, except when equipment is placed in or removed from the container.

Pursuant to 326 IAC 20-48-4, the following operator training requirements apply:

(a) Each Permittee shall train all new and existing personnel, including contract personnel, who are involved in resin and gel coat spraying and applications that could result in excess emissions if performed improperly according to the following schedule:

(1) All personnel hired shall be trained within fifteen (15) days of hiring.

(2) To ensure training goals listed in subsection (b) are maintained, all personnel shall be given refresher training annually.

(3) Personnel who have been trained by another owner or operator subject to this rule are exempt from (a)(1) above if written documentation that the employee's training is current is provided to the new employer.

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

(1) Appropriate application techniques.

(2) Appropriate equipment cleaning procedures.

(3) Appropriate equipment setup and adjustment to minimize material usage and overspray.

(c) The Permittee shall maintain the following training records on site and available for inspection and review:

(1) A copy of the current training program.

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

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

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

Pursuant to 326 IAC 20-48-1(c) and 326 IAC 20-25-1(c), sources subject to 326 IAC 20-48 are exempt from 326 IAC 20-25 after August 22, 2004. Therefore, the open molding facilities are not subject to the requirements of 326 IAC 20-25.

State Rule Applicability – Gel Coating Booths, Resin and Foam Filling Booths, Paint Spray Booths, Lamination and Foam Filling Areas, Gel Coating/Resin Application Booths, and Assembly, Subassembly, Upholstery Area

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

(a) The gel coating booths (identified as GSB4, GSB5, and GSB6), resin and foam filling booths (identified as STB1, STB2, STB3, and STB4), IMRON paint spray booths (identified as SB1, SB2, SB3, SB4 and SB5), and lamination and foam filling areas (identified as AV2, AV3, AV4, AV5, AV6, AV7, AV8, and AV9) are subject to the requirements of 326 IAC 8-1-6 because these facilities have potential VOC emissions equal to or greater than 25 tons per year and were constructed after the January 1, 1980 applicability date for this rule.

Pursuant to 326 IAC 8-1-6, construction permit CP (01) 1658, issued October 20, 1987, Significant Source Modification 001-11987-00031, issued October 6, 2000, Significant Source Modification 001-16599-00031, and Significant Permit Modification 001-17374-00031, issued August 15, 2003, the gel coating booths (identified as GSB4, GSB5, and GSB6), resin and foam filling booths (identified as STB1, STB2, STB3, and STB4), IMRON paint spray booths (identified as SB1, SB2, SB3, SB4 and SB5), and lamination and foam filling areas (identified as AV2, AV3, AV4, AV5, AV6, AV7, AV8, and AV9) shall comply with the following BACT requirements:

(1) Monthly usage by weight, volatile organic content, method of application, and other emission reduction techniques for each gel coat, resin, and paint 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.

(2) Until such time as 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: “Unified Emission Factors for Open Molding of Composites,” Composites Fabricators Association,

July 23, 2001, or its updates, and shall not exceed 32.3% styrene emitted by 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. Emission factors for methyl methacrylate may be obtained from the "Unified Emission Factors for Open Molding of Composites," which allows for specific emission determinations for methyl methacrylate.

(3) Resins and gel coats used, including filled resins and tooling resins and gel coats, shall be limited to a maximum monomer content of 35% by weight for resins, 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%, and/or gel coats with a monomer content 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 basis as shown below:

(Emissions from >35% resin or >37% gel coat) – (Emissions from 35% resin or 37% gel coat) ≤ (Emissions from 35% resin or 37% gel coat) – (Emissions from <35% resin or <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) x EF (Monomer emission factor for resin or gel coat 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.

(4) Flow coaters, a type of non-spray application technology of a design and specifications to be approved by IDEM, OAQ, shall be used in the following manner:

(A) To apply 50% of all neat resins within 6 months of commencement of operation.

(B) To apply 100% of all neat resins 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 emission reductions must be obtained via use of other techniques, such as those listed in (3) above, elsewhere in the process.

(5) Optimized spray techniques according to a manner approved by IDEM, OAQ 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 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.

(6) The following listed work practices shall be followed:

(A) To the extent possible, a non-VOC, non-HAP solvent shall be used for cleanup.

(B) Cleanup solvent containers used to transport solvent from drums to work stations shall be closed containers having soft gasketed spring-loaded closures.

(C) Cleanup rags saturated with solvent shall be stored, transported, and disposed of in containers that are closed tightly.

(D) The spray guns used shall be the type that can be cleaned without the need for spraying the solvent into the air.

(E) 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. The waste solvent shall be disposed of in such a manner that evaporation is minimized, and managed in accordance with applicable solid or hazardous waste requirements.

(F) Storage containers used to store materials that contain VOC and/or HAP shall be kept covered when not in use.

(b) Although constructed after January 1, 1980, the spray paint booths SB6, SB7, and SB8 have potential VOC emissions less than 25 tons per year; therefore, 326 IAC 8-1-6 does not apply to these units. Any change that would increase the potential VOC emissions from these spray paint booths SB6, SB7, and SB8 to greater than or equal to 25 tons per year requires prior approval from IDEM, OAQ.

(c) Gel coat/resin booths STB5 through STB12 are subject to the requirements of 326 IAC 8-1-6 because each booth has potential VOC emissions greater than 25 tons per year and was constructed after January 1, 1980.

Pursuant to SSM 001-11987-00031, issued October 6, 2000, and Minor Source Modification 001-15840-00031, issued on October 4, 2002, gel coat/resin booths STB5 through STB12 shall comply with the following BACT requirements:

(1) Use of resins, gel coats and clean-up solvents, as well as VOC delivered to the applicators shall be limited such that the potential to emit (PTE) of volatile organic HAP from resin and gel coat applications shall be limited to less than 100 tons per twelve (12) consecutive 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 as 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: Unified Emission Factors for Open Molding of Composites," Composites Fabricators Association, July 23, 2001 or its updates, and shall not exceed 32.3% styrene emitted by 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. Emission factors for methyl methacrylate may be obtained from the "Unified Emission Factors for Open Molding of Composites," which allows for specific emission determinations for methyl methacrylate.

(2) Resins and gel coats used, including filled resins and tooling resins and gel coats, shall be limited to a maximum monomer contents of 35% by weight for resins and 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 and gel coats with monomer contents lower than 35%, and/or additional emission reduction techniques approved by IDEM, OAQ, may be used to offset the use of resins and gel coats with monomer contents higher than 35%. 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 basis as shown below:

(Emissions from >35% resin or gel coat) – (Emissions from 35% resin or gel coat) ≤ (Emissions from 35% resin or gel coat) – (Emissions from <35% resin or gel coat, and/or other emission reduction techniques).

Where:
Emissions (lb or ton) = M (mass of resin or gel coat used, lb or ton) x EF (Monomer emission factor for resin or gel coat 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.

(3) 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 neat resins. If, after 1 year of operation, it is not possible to apply a portion of neat resins with flow coaters, equivalent emission reductions must be obtained via use of other techniques, such as those listed in (2) above, elsewhere in the process.

(4) Optimized spray techniques according to a manner approved by IDEM, OAQ 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, high volume 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.

(5) The following listed work practices shall be followed:

(A) To the extent possible, a non-VOC, Non-HAP solvent shall be used for cleanup.

(B) Cleanup solvent containers used to transport solvent from drums to work stations shall be closed containers having soft gasketed spring-loaded closures.

(C) Cleanup rags saturated with solvent shall be stored, transported, and disposed of in containers that are closed tightly.

(D) The spray guns used shall be the type that can be cleaned without the need for spraying the solvent into the air.

(E) 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.

(F) Storage containers used to store materials that contain VOC and/or HAP shall be kept covered when not in use.

(d) The assembly, subassembly, and upholstery area, identified as AU1, was constructed after January 1, 1980 and has potential VOC emissions greater than 25 tons per year.

Pursuant to SSM 001-11987-00031, issued October 6, 2000, the assembly, subassembly, and upholstery area (identified as AU1) shall comply with the following BACT requirements:

(1) The VOC content of the adhesives and sealants applied shall not exceed 9.5 pounds per gallon less water.

(2) The total VOC input to the assembly, subassembly, upholstery area, including any cleanup solvents, shall not exceed 55.9 tons per twelve (12) consecutive month period.

(3) Proper equipment cleanup and maintenance shall be performed, including containment of any solvent used during equipment cleanup. Such containers shall be closed as soon as cleanup is complete, and any waste solvent shall be disposed of in such a manner that minimizes evaporation.

(e) Gel coating/resin booths STB13 through STB24, and gel coating booth GSB3 have potential VOC emissions less than twenty-five (25) tons per year. Therefore 326 IAC 8-1-6 does not apply to these units.

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

(a) Pursuant to 326 IAC 6-3-2(d), particulate from the gel coating booths, resin and foam filling booths, paint spray booths, and gel coating/resin application booths shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

(b) The operations at the assembly, subassembly, upholstery area (AU1) and the lamination and foam filling areas do not result in the formation of airborne particulate matter. Therefore, the requirements of 326 IAC 6-3-2 do not apply.

State Rule Applicability – Insignificant Activities

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

(a) The welding operations at this source consume less than 625 pounds of rod or wire per day. The torch cutting operations at this source source cut less than 3,400 inches per

hour of stock one inch thick or less. Pursuant to 326 IAC 6-3-1(b)(9) and (10), the welding and cutting operations are exempt under the requirements of 326 IAC 6-3-2.

(b) The insignificant cut/trim, grinding, machining and wood working equipment, controlled with baghouses BH1 and BH2, emits airborne particulate matter and is subject to the requirements of 326 IAC 6-3-2. Pursuant to 326 IAC 6-3-2, the allowable particulate emission rate from the insignificant cut/trim, grinding, machining and wood working equipment shall be limited by the following:

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

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

(c) The insignificant wood/plastic working shop, controlled with baghouse BH3, emits airborne particulate matter and is subject to the requirements of 326 IAC 6-3-2. Pursuant to 326 IAC 6-3-2, the allowable particulate emission rate from the insignificant wood/plastic working shop shall be limited by the following:

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

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

The baghouses (BH1, BH2 and BH3) shall be in operation at all times that the insignificant cut/trim, grinding, machining, wood working equipment and wood/plastic working shop are in operation, in order to comply with this limit.

Testing Requirements

The Permittee is not required to perform compliance stack tests on the gelcoat, resin and foam fill, paint spray, lamination and foam fill, and gel coat/resin operations for VOC and HAP emissions because there are no VOC and HAP control devices in operation. The Permittee is required by conditions of this permit to keep records of the VOC and HAP used in these facilities, which will be sufficient to ensure compliance with the applicable limitations.

Compliance Requirements

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

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

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

1. The gelcoat, resin and foam fill, molding, paint spray, lamination and foam fill, and gel coat/resin operations (GSB3, GSB4, GSB5, GSB6, STB1 through STB24, SB1 through SB9, and AV2 through AV9) have applicable compliance monitoring conditions as specified below:

   (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the gel coat, resin coating, and surface coating booth stacks while one or more of the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

   (b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

   These monitoring conditions are necessary because the dry filters used to control particulate emissions from these emission units must operate properly to ensure compliance with 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) and 326 IAC 2-7 (Part 70).

Conclusion

The operation of this fiberglass boat manufacturing operation shall be subject to the conditions of this Part 70 permit 001-18296-00031.

Appendix A: Emission Calculations
Reinforced Plastics and Composites - Open Molding Operations

Company Name: Thunderbird Products, Inc.
Address: 2200 West Monroe Street, Decatur, Indiana 46733
Title V: T001-18296-00031
Reviewer: ERG/ST
Date: September 1, 2006

MMA Emissions From Gelcoat Application - STB13-STB24

Emission Unit ID	Material Name	Wt % MMA	lb/unit	unit/hour	UEF (lb/ton)	VOC/HAP (lb/day)	VOC/HAP (TPY)
STB13	Ashland 1000	2.0%	209	0.00571	30.00	0.43	0.08
STB14	Ashland 1000	2.0%	188	0.00571	30.00	0.39	0.07
STB15	Ashland 1000	2.0%	188	0.00571	30.00	0.39	0.07
STB16	Ashland 1000	2.0%	184	0.00571	30.00	0.38	0.07
STB17	Ashland 1000	2.0%	184	0.00571	30.00	0.38	0.07
STB18	Ashland 1000	2.0%	148	0.00571	30.00	0.30	0.06
STB19	Ashland 1000	2.0%	0	0.02000	30.00	0.00	0.00
STB20	Ashland 1000	2.0%	244	0.00571	30.00	0.50	0.09
STB21	Ashland 1000	2.0%	209	0.01250	30.00	0.94	0.17
STB22	Ashland 1000	2.0%	0	0.01250	30.00	0.00	0.00
STB23	Ashland 1000	2.0%	0	0.01670	30.00	0.00	0.00
STB24	Ashland 1000	2.0%	0	0.02000	30.00	0.00	0.00

Assume that all HAP emissions (after UEF Emission Factor) are VOC emissions.
Emission Factors for Styrene and Methyl Methacrylate (MMA) for resin and gelcoat operations are from the CFA Unified Emission Factors (July 23, 2001)

METHODOLOGY
PTE VOC/HAP (lb/day) = Pounds of material used per unit (lb/unit) * Max. usage (unit/hr) * Emission Factor (lb /ton) * 24 hrs/day * 1 ton/2000 lbs
PTE VOC/HAP (ton/year) = PTE VOC/HAP (lb/day) * 365 days/year * 1 ton/2000 lb

Appendix A: Emission Calculations
Reinforced Plastics and Composites - Open Molding Operations

Company Name: Thunderbird Products, Inc.
Address: 2200 West Monroe Street, Decatur, Indiana 46733
Title V: T001-18296-00031
Reviewer: ERG/ST
Date: September 1, 2006

Styrene Emissions From Gelcoat Application - STB13-STB24

Emission Unit ID	Material Name	Wt. % Styrene	lb/unit	unit/hour	UEF (lb/ton)	VOC/HAP (lb/day)	VOC/HAP (TPY)
STB13	Gelcoat White	31.76%	209	0.00571	0.445	4.05	0.74
STB14	Gelcoat White	31.76%	188	0.00571	0.445	3.64	0.66
STB15	Gelcoat White	31.76%	188	0.00571	0.445	3.64	0.66
STB16	Gelcoat White	31.76%	184	0.00571	0.445	3.56	0.65
STB17	Gelcoat White	31.76%	184	0.00571	0.445	3.56	0.65
STB18	Gelcoat White	31.76%	148	0.00571	0.445	2.87	0.52
STB19	Gelcoat White	31.76%	0	0.02000	0.445	0.00	0.00
STB20	Gelcoat White	31.76%	244	0.00571	0.445	4.73	0.86
STB21	Gelcoat White	31.76%	209	0.00570	0.445	4.04	0.74
STB22	Gelcoat White	31.76%	0	0.01250	0.445	0.00	0.00
STB23	Gelcoat White	31.76%	0	0.01670	0.445	0.00	0.00
STB24	Gelcoat White	31.76%	0	0.02000	0.445	0.00	0.00

Assume that all HAP emissions (after UEF Emission Factor) are VOC emissions.
Emission Factors for Styrene and Methyl Methacrylate (MMA) for resin and gelcoat operations are from the CFA Unified Emission Factors (July 23, 2001)

METHODOLOGY
PTE VOC/HAP (lb/day) = Pounds of material used per unit (lb/unit) * Max. usage (unit/hr) * Emission Factor (lb /ton) * 24 hrs/day * 1 ton/2000 lbs
PTE VOC/HAP (ton/year) = PTE VOC/HAP (lb/day) * 365 days/year * 1 ton/2000 lb

Appendix A: Emission Calculations
Reinforced Plastics and Composites - Open Molding Operations

Company Name: Thunderbird Products, Inc.
Address: 2200 West Monroe Street, Decatur, Indiana 46733
Title V: T001-18296-00031
Reviewer: ERG/ST
Date: September 1, 2006

Styrene Emissions From Manual Resin Application - STB13-STB24

Emission Unit ID	Material Name	Wt % Styrene	lb/unit	unit/hour	UEF (lb/ton)	VOC/HAP (lb/day)	VOC/HAP (TPY)
STB13	Ashland 1000	32.94%	64	0.00571	0.126	0.364	0.066
STB13	Ashland 5000	32.04%	19	0.00571	0.126	0.105	0.019
STB14	Ashland 1000	32.94%	57	0.00571	0.126	0.324	0.059
STB14	Ashland 5000	32.04%	23	0.00571	0.126	0.127	0.023
STB15	Ashland 1000	32.94%	57	0.00571	0.126	0.324	0.059
STB15	Ashland 5000	32.04%	15	0.00571	0.126	0.083	0.015
STB16	Ashland 1000	32.94%	30	0.00571	0.126	0.171	0.031
STB16	Ashland 5000	32.04%	22	0.00571	0.126	0.122	0.022
STB17	Ashland 1000	32.94%	2	0.00571	0.126	0.011	0.002
STB17	Ashland 5000	32.04%	50	0.00571	0.126	0.277	0.050
STB18	Ashland 1000	32.94%	24	0.00571	0.126	0.137	0.025
STB18	Ashland 5000	32.04%	19	0.00571	0.126	0.105	0.019
STB19	Ashland 1000	32.94%	0	0.02000	0.126	0.000	0.000
STB19	Ashland 5000	32.04%	29	0.02000	0.126	0.562	0.103
STB20	Ashland 1000	32.94%	42	0.00571	0.126	0.239	0.044
STB20	Ashland 5000	32.04%	25	0.00571	0.126	0.138	0.025
STB21	Ashland 1000	32.94%	71	0.01250	0.126	0.884	0.161
STB21	Ashland 5000	32.04%	21	0.01250	0.126	0.254	0.046
STB22	Ashland 1000	32.94%	28	0.01250	0.126	0.349	0.064
STB22	Ashland 5000	32.04%	9	0.01250	0.126	0.109	0.020
STB23	Ashland 1000	32.94%	28	0.01670	0.126	0.466	0.085
STB23	Ashland 5000	32.04%	9	0.01670	0.126	0.146	0.027
STB24	Ashland 1000	32.94%	28	0.02000	0.126	0.558	0.102
STB24	Ashland 5000	32.04%	9	0.02000	0.126	0.174	0.032

Assume that all HAP emissions (after UEF Emission Factor) are VOC emissions.
Emission Factors for Styrene and Methyl Methacrylate (MMA) for resin and gelcoat operations are from the CFA Unified Emission Factors (July 23, 2001)

METHODOLOGY
PTE VOC/HAP (lb/day) = Pounds of material used per unit (lb/unit) * Max. usage (unit/hr) * Emission Factor (lb /ton) * 24 hrs/day * 1 ton/2000 lbs
PTE VOC/HAP (ton/year) = PTE VOC/HAP (lb/day) * 365 days/year * 1 ton/2000 lb

Appendix A: Emission Calculations
Reinforced Plastics and Composites - Open Molding Operations

Company Name: Thunderbird Products, Inc.
Address: 2200 West Monroe Street, Decatur, Indiana 46733
Title V: T001-18296-00031
Reviewer: ERG/ST
Date: September 1, 2006

Styrene Emissions From Mechanical Resin Application - STB13-STB24

Emission Unit ID	Material Name	Wt % Styrene	lb/unit	unit/hour	UEF (lb/ton)	VOC/HAP (lb/day)	VOC/HAP (TPY)
STB13	Ashland 1000	32.94%	1543	0.00571	0.107	7.45	1.36
STB13	Ashland 5000	32.04%	450	0.00571	0.107	2.11	0.39
STB14	Ashland 1000	32.94%	1379	0.00571	0.107	6.66	1.22
STB14	Ashland 5000	32.04%	562	0.00571	0.107	2.64	0.48
STB15	Ashland 1000	32.94%	1360	0.00571	0.107	6.57	1.20
STB15	Ashland 5000	32.04%	361	0.00571	0.107	1.70	0.31
STB16	Ashland 1000	32.94%	730	0.00571	0.107	3.53	0.64
STB16	Ashland 5000	32.04%	519	0.00571	0.107	2.44	0.44
STB17	Ashland 1000	32.94%	43	0.00571	0.107	0.21	0.04
STB17	Ashland 5000	32.04%	1197	0.00571	0.107	5.62	1.03
STB18	Ashland 1000	32.94%	573	0.00571	0.107	2.77	0.51
STB18	Ashland 5000	32.04%	457	0.00571	0.107	2.15	0.39
STB19	Ashland 1000	32.94%	0	0.02	0.107	0.00	0.00
STB19	Ashland 5000	32.04%	691	0.02	0.107	11.37	2.08
STB20	Ashland 1000	32.94%	1017	0.00571	0.107	4.91	0.90
STB20	Ashland 5000	32.04%	606	0.00571	0.107	2.85	0.52
STB21	Ashland 1000	32.94%	1709	0.00571	0.107	8.25	1.51
STB21	Ashland 5000	32.04%	516	0.00571	0.107	2.42	0.44
STB22	Ashland 1000	32.94%	666	0.0125	0.107	7.04	1.29
STB22	Ashland 5000	32.04%	210	0.0125	0.107	2.16	0.39
STB23	Ashland 1000	32.94%	666	0.0167	0.107	9.41	1.72
STB23	Ashland 5000	32.04%	210	0.0167	0.107	2.89	0.53
STB24	Ashland 1000	32.94%	666	0.02	0.107	11.27	2.06
STB24	Ashland 5000	32.04%	210	0.02	0.107	3.46	0.63

Assume that all HAP emissions (after UEF Emission Factor) are VOC emissions.
Emission Factors for Styrene and Methyl Methacrylate (MMA) for resin and gelcoat operations are from the CFA Unified Emission Factors (July 23, 2001)

METHODOLOGY
PTE VOC/HAP (lb/day) = Pounds of material used per unit (lb/unit) * Max. usage (unit/hr) * Emission Factor (lb /ton) * 24 hrs/day * 1 ton/2000 lbs
PTE VOC/HAP (ton/year) = PTE VOC/HAP (lb/day) * 365 days/year * 1 ton/2000 lb

Appendix A: Emission Calculations
PM Emissions from Reinforced Plastics and Composites

Company Name: Thunderbird Products, Inc.
Address: 2200 West Monroe Street, Decatur, Indiana 46733
Title V: T001-18296-00031
Reviewer: ERG/ST
Date: September 1, 2006

Emission Unit ID	Material Name	Wt. % Solids	lb/unit	unit/hour	Transfer eff.	PM (lb/hr)	PM (tpy)
STB13	Ashland 1000	67.06%	64	0.00571	75%	0.06	0.27
STB13	Ashland 5000	67.96%	19	0.00571	75%	0.02	0.08
STB14	Ashland 1000	67.06%	57	0.00571	75%	0.05	0.24
STB14	Ashland 5000	67.96%	23	0.00571	75%	0.02	0.10
STB15	Ashland 1000	67.06%	57	0.00571	75%	0.05	0.24
STB15	Ashland 5000	67.96%	15	0.00571	75%	0.01	0.06
STB16	Ashland 1000	67.06%	30	0.00571	75%	0.03	0.13
STB16	Ashland 5000	67.96%	22	0.00571	75%	0.02	0.09
STB17	Ashland 1000	67.06%	2	0.00571	75%	0.00	0.01
STB17	Ashland 5000	67.96%	50	0.00571	75%	0.05	0.21
STB18	Ashland 1000	67.06%	24	0.00571	75%	0.02	0.10
STB18	Ashland 5000	67.96%	19	0.00571	75%	0.02	0.08
STB19	Ashland 1000	67.06%	0	0.02000	75%	0.00	0.00
STB19	Ashland 5000	67.96%	29	0.02000	75%	0.10	0.43
STB20	Ashland 1000	67.06%	42	0.00571	75%	0.04	0.18
STB20	Ashland 5000	67.96%	25	0.00571	75%	0.02	0.11
STB21	Ashland 1000	67.06%	71	0.01250	75%	0.15	0.65
STB21	Ashland 5000	67.96%	21	0.01250	75%	0.04	0.20
STB22	Ashland 1000	67.06%	28	0.01250	75%	0.06	0.26
STB22	Ashland 5000	67.96%	9	0.01250	75%	0.02	0.08
STB23	Ashland 1000	67.06%	28	0.01670	75%	0.08	0.34
STB23	Ashland 5000	67.96%	9	0.01670	75%	0.03	0.11
STB24	Ashland 1000	67.06%	28	0.02000	75%	0.09	0.41
STB24	Ashland 5000	67.96%	9	0.02000	75%	0.03	0.13
STB13	Gelcoat White	66.24%	209	0.00571	100%	0.00	0.00
STB14	Gelcoat White	66.24%	188	0.00571	100%	0.00	0.00
STB15	Gelcoat White	66.24%	188	0.00571	100%	0.00	0.00
STB16	Gelcoat White	66.24%	184	0.00571	100%	0.00	0.00
STB17	Gelcoat White	66.24%	184	0.00571	100%	0.00	0.00
STB18	Gelcoat White	66.24%	148	0.00571	100%	0.00	0.00
STB19	Gelcoat White	66.24%	0	0.02000	100%	0.00	0.00
STB20	Gelcoat White	66.24%	244	0.00571	100%	0.00	0.00
STB21	Gelcoat White	66.24%	209	0.01250	100%	0.00	0.00
STB22	Gelcoat White	66.24%	0	0.01250	100%	0.00	0.00
STB23	Gelcoat White	66.24%	0	0.01670	100%	0.00	0.00
STB24	Gelcoat White	66.24%	0	0.02000	100%	0.00	0.00

Emission Unit ID	Material Name	Wt. % Solids	Annual Usage (lb)	Production hrs	Transfer eff.	PM (lb/hr)	PM (tpy)
GSB3	Tangerine Tool	60.91%	1500	200.00	75.00%	45682.50	5.00

PTE PM (lbs/hr) = Usage (lbs/unit * Production Rate (units/hr) * Weight % solids * (1 - Transfer Eff. %)
PTE PM (ton/year) = PTE PM (lbs/hr) * 8760 hrs/year * 1 ton/2000 lb

Appendix A: Emission Calculations
Reinforced Plastics and Composites - Open Molding Operations

Company Name: Thunderbird Products, Inc.
Address: 2200 West Monroe Street, Decatur, Indiana 46733
Title V: T001-18296-00031
Reviewer: ERG/ST
Date: September 1, 2006

Styrene and MMA Emissions From Tooling - GSB3

Emission Unit ID	Material Name	Wt % Styrene/MMA	Annual Usage (lb)	UEF (lb/ton)	Production hr/yr	PTE VOC/HAP (tons/yr)
GSB3	Tangerine Tool	36.91%	1500	377	200	0.14
GSB3	Tangerine Tool	3.00%	1500	45	200	0.02

Assume that all HAP emissions (after UEF Emission Factor) are VOC emissions.
Emission Factors for Styrene and Methyl Methacrylate (MMA) for resin and gelcoat operations are from the CFA Unified Emission Factors (July 23, 2001)

METHODOLOGY
PTE VOC/HAP (ton/year) = Annual Usage (lbs/year) * Emission Factor (lb/ton) * 1 ton/2000 lbs * 1 ton/2000 lbs

Appendix A: Emissions Calculations
Air Make-Up Units - Natural Gas Combustion

Company Name: Thunderbird Products, Inc.
Address: 2200 West Monroe Street, Decatur, Indiana 46733
Title V: T001-18296-00031
Reviewer: ERG/ST
Date: September 1, 2006

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
13.2	113.4

	Pollutant						
	PM*	**PM10***	**SO_2**	**NOx ****	**VOC**	**CO**	**HAPs**
Emission Factor in lb/MMCF	1.9	7.6	0.60	100 **see below	5.50	84.0	1.89
Potential Emission in tons/yr	0.11	0.43	0.03	5.67	0.31	4.76	0.11

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
**Emission Factor for NOx: Uncontrolled = 100
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

METHODOLOGY
Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu
PTE (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Appendix A: Emission Calculations
Space Heaters - Natural Gas Combustion

Company Name: Thunderbird Products, Inc.
Address: 2200 West Monroe Street, Decatur, Indiana 46733
Title V: T001-18296-00031
Reviewer: ERG/ST
Date: September 1, 2006

Total Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
55.00	472

	Pollutant						
	PM*	**PM10***	**SO_2**	**NOx ****	**VOC**	**CO**	**HAPs**
Emission Factor in lb/MMCF	1.90	7.60	0.60	100	5.50	84.0	1.89
Potential to Emit (tons/yr)	0.45	1.79	0.14	23.6	1.30	19.8	0.45

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

**Emission factor for NO_x: Uncontrolled = 100

Emission factors are from AP-42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (July, 98)

Methodology

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu
PTE (tons/yr) = Potential throughput (MMCF/yr) x Emission Factor (lb/MMCF) x 1 ton/2000 lbs