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

Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

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

July 22, 2004

TO: Interested Parties / Applicant

RE: Starcraft Marine, LLC / 087-18367-00012

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

Notice of Decision – Approval

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 326 IAC 2, this approval was effective immediately upon submittal of the application.

If you wish to challenge this decision, IC 4-21.5-3-7 requires that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days from the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures
FNPER-AM.dot 9/16/03

July 22, 2004

Mr. Pat Robinson
Starcraft Marine, L.L.C.
201 Starcraft Drive
Topeka, Indiana 46571

Re: 087-18367-00012
Third Administrative Amendment to
Part 70 T 087-7474-00012

Dear Mr. Robinson:

Starcraft Marine, L.L.C. was issued a permit on June 21, 1999 for a stationary fiberglass and aluminum boats manufacturing plant. A letter requesting a change was received on November 14, 2003. Pursuant to the provisions of 326 IAC 2-7-11(a)(7) the permit is hereby amended as described in the attached Technical Support Document:

Specifically, Starcraft Marine, L.L.C. has submitted an application to:

(a) replace gelcoat booth B-4 with a new booth, and

(b) remove gelcoat booth B-5, replace it with paint booth B-8, and exhaust the emissions through Stacks SV94 and SV95.

Replacing gelcoat booth B-4 will not result in an increase in production or emissions, require any changes to any existing permit conditions, or trigger any new applicable requirements because the only item that will be replaced is the booth (the application equipment will be the same) and the booth will be of similar design and capacity as the current existing booth.

Starcraft is also proposing to remove gelcoat booth B-5, replace it with paint booth B-8, and change the exhaust configuration such that the emissions will be exhausted through Stacks SV94 and SV95 instead of SV92 and SV93. Replacing the booth will not result in an increase in production or emissions, require any changes to any existing permit conditions, or trigger any new applicable requirements because the only item that will be replaced is the booth (the application equipment will be the same), paint booth B-8 is similar in capacity and will be modified to have similar particulate controls as existing gelcoat booth B-5, and there will be no replacement to paint booth B-8.

Therefore, the proposed changes shall be incorporated into the existing source Part 70 permit via an administrative amendment pursuant t 326 IAC 2-7-11(a)(7) which states that changes which revise descriptive information where the revision will not trigger a new applicable requirement or violate a permit term may be incorporated into the existing source Part 70 permit via an administrative amendment.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Scott Fulton, of my staff, at 317-233-5691 or 1-800-451-6027, press 0 and ask for extension 3-5691.

Sincerely,
Original signed by Paul Dubenetzky

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments:
SDF

cc: File - LaGrange County
LaGrange County Health Department
Air Compliance Section - Doyle Houser
Compliance Data Section - Karen Ampil
IDEM Northern Regional Office
Air Programs - Chet Bohannon
Contract Management - Duane Van Laningham (087-18090)

PART 70 OPERATING PERMIT
OFFICE OF AIR QUALITY

Starcraft Marine, L.L.C.
201 Starcraft Drive
Topeka, IN 46571

Starcraft Marine, L.L.C. (herein known as the Permittee) is hereby authorized to operate a facility that manufactures aluminum and fiber glass boats, subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

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 and 326 IAC 2-1-3.2 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.: T087-7474-00012	Date Issued: June 21, 1999 Expiration Date: June 21, 2004
Issued by: Janet G. McCabe, Assistant Commissioner, Office of Air Quality	

First Administrative Amendment No.: 087-12591-00012 Date Issued: September 29, 2000
Second Administrative Amendment No.: 087-18207-00012 Date Issued: October 28, 2003

Third Administrative Amendment No.: 087-18367-00012	Affected Pages: 4, 5, and 28 - 31
Issued by: Original signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	**July 22, 2004**

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)]

The Permittee owns and operates a stationary fiberglass and aluminum boats manufacturing plant.

Responsible Official:	Pat Robinson/General Manager
Source Address:	201 Starcraft Drive, Topeka, IN 46571
Mailing Address:	201 Starcraft Drive, Topeka, IN 46571
SIC Code:	3732
County Location:	LaGrange
County Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD or Emission Offset Rules; Major Source, Section 112 of the Clean Air Act

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

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

(a) Four (4) paint (primer or enamel) booths identified as:
- (i) B-1 exhausting through the stack: SV-83 with a maximum production rate of 100 parts per hour,
- (ii) B-3 exhausting through the stacks: SV-84 and SV-85 with a maximum production rate of 100 parts per hour,
- (iii) B-2 exhausting through the stacks: SV-86 and SV-87 with a maximum production rate of 100 parts per hour, and
- (iv) B-6 exhausting through the stacks: SV-88 and SV-89 with a maximum production rate of 2 boats per hour or the equivalent in parts for 2 boats per hour and the use of air assisted airless type spray guns for BACT compliance,

Each booth is equipped with a dry filter to control the PM emissions.

(b) Three (3) gel coat booths identified as:
- (i) B-4 exhausting through the stack: SV-90 and SV-91 with a maximum production rate of 30 parts per hour,
- (ii) B-5 exhausting through the stack: SV-94 and SV-95 with a maximum production rate of 30 parts per hour,
- (iii) B-7 exhausting through the stack: SV-94 and SV-95 with a maximum production rate of 1 boat per hour or the equivalent of parts for 1 boat per hour and the use of air assisted airless type spray guns for BACT compliance, and

Each booth is equipped with a dry filter to control the PM emissions.

(c) One (1) catalyst/fiber resin chopper operation area exhausting at (7) stacks identified as SV-96A, SV-96B, SV-96C, SV-96D, SV-96E, SV-96F, SV-96G

(d) One fiberglass grinding room exhausting through the stack SV-103 and equipped with dust collector.

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

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

(a) The following equipment related to manufacturing activities brazing equipment, cutting torches, soldering equipment, welding equipment, including forty-five (45) welding machines and three (3) plasma cutters that exhaust thru stacks as well as fugitive throughout the facility. Welding and cutting operations have PM-10 emission less than twenty-five (25) pounds per day.

(b) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations. The main woodworking operation is equipped with a large cyclone dust collector system identified as SV-102.

(c) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals measured at 38 degrees (C).

(d) Three (3) resin tanks exhausting through stacks: SV-99, SV-100, and SV-101.

(e) Three (3) plasma cutters with no control and exhausting through stacks.

(f) Other activities or categories not previously identified:

Wash tank located at: 1-Primer Booth with VOC emissions of 5 gal per month,
Wash tanks located at: 4-B-4 and B-5 with VOC emissions of 20 gal per month,
Wash tank located at: 2FG area with VOC emissions of 10 gal per month, and
Wash tank located at: 2-B-7 with VOC emissions of 10 gal per month.
Wash tanks for facility wide use that will not use more than 20 gallons per month each.

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

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:
Four (4) paint (primer or enamel) booths identified as:

(i) B-1 exhausting through the stack: SV-83 with a maximum production rate of 100 parts per hour
(ii) B-3 exhausting through the stacks: SV-84 and SV-85 with a maximum production rate of 100 parts per hour
(iii) B-2 exhausting through the stacks: SV-86 and SV-87 with a maximum production rate of 100 parts per hour, and
(iv) B-6 exhausting through the stacks: SV-88 and SV-89 with a maximum production rate of 2 boats per hour or the equivalent in parts for 2 boats per hour and the use of air assisted airless type spray guns for BACT compliance,

Each booth is equipped with a dry filter to control the PM emissions.

Three (3) gel coat booths identified as:

(i) B-4 exhausting through the stack: SV-90 and SV-91 with a maximum production rate of 30 parts per hour
(ii) B-5 exhausting through the stack: SV-94 and SV-95 with a maximum production rate of 30 parts per hour, and
(iii) B-7 exhausting through the stack: SV-94 and SV-95 with a maximum production rate of 1 boat per hour or the equivalent of parts for 1 boat per hour and the use of air assisted airless type spray guns for BACT compliance.

Each booth is equipped with dry filter to control the PM emissions.

One (1) catalyst/fiber resin chopper operation area exhausting through seven (7) stacks identified as SV-96A, SV-96B, SV-96C, SV-96D, SV-96E, SV-96F and SV-96G.

One fiberglass grinding room exhausting through the stack SV-103 and equipped with dust collector.

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

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

Pursuant to 326 IAC 8-1-6 (General Provisions relating VOC rules: general reduction requirements for new facilities), the spray booths V-6 and B-7 shall comply with the following:

(a) The surface coating transfer efficiencies shall be maintained at the levels generated by air assisted airless type spray applicator, or improved levels.

(b) One spray booth for aluminum boat coating, designated as B-6 with an air-assisted airless type spray applicator shall be limited to painting 2 boats per hour.

(c) One spray booth for fiberglass boat coating, designated as B-7 with an air-assisted airless type spray applicator shall be limited to painting 1 boat per hour.

This will satisfy the requirements of 326 IAC 8-1-6 for spray booths B-6 and B-7.

D.1.2 PSD Minor Limit [326 IAC 2-2 [40 CFR 52.21]

As specified in condition C.1, the total source potential to emit VOCs is limited to 250 tons per year. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply. Compliance with this limit shall be demonstrated by use of the following equation:

(Input VOC from paint booths) + (Input VOC from Gel Coat x emission factor) + (Input VOC from Catalyst/Resin x emission factor) + (Input VOC from solvent usage) + (Input VOC from Insignificant activities) < 250 tons per year

D.1.3 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the PM from these facilities shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and for all dry filters used as control devices.

Compliance Determination Requirements

D.1.5 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC and Particulate Matter limits specified in Conditions D.1.1 and D.1.3 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.6 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4. Compliance regarding fiberglass operations shall be determined based upon the following criteria:

(1) Monthly usage by weight, monomer content, method of application, and other emission reduction techniques for each gel coat and resin shall be recorded. Volatile organic HAP emissions shall be calculated by multiplying the usage of each gel coat and resin by the emission factor that is appropriate for the monomer content, method of application, and other emission reduction techniques for each gel coat and resin, and summing the emissions for all gel coats and resins. Emission factors shall be obtained from the reference approved by IDEM, OAM.

(2) Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA-approved form, emission factors shall be taken from the following reference approved by IDEM, OAM: "CFA Emission Models for the Reinforced Plastics Industries", Composites Fabricators Association, February 28, 1998, and shall not exceed 32.3% styrene emitted per weight of gel coat applied and 17.7% styrene emitted per weight of resin applied. For the purposes of these emission calculations, monomer in resins and gel coats that is not styrene shall be considered as styrene on an equivalent weight basis.

D.1.7 VOC Emissions

Compliance with Condition D.1.2 shall be demonstrated at the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

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

D.1.8 Particulate Matter (PM)

Pursuant to operation permit # 44-01-92-0064 issued in January 1, 1992 and construction permit CP 087-4334 issued in June 1,1995, the dry filters from the paint booths, the gel coating booths and the catalyst/fiber resin choppers and the dust collector from the fiberglass grinding operations shall be in operation at all times when the surface coating, choppers or grinders are in operation.

D.1.9 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (SV-83, 84,85, 86, 87, 88, 89, 90, 91, 94, 95, 96, 97, 98) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

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

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

D.1.10 Record Keeping Requirements for VOC

(a) To document compliance with Conditions D.1.1, and D.1.2 the Permittee shall maintain records of the amount and VOC content of each paint, resin and gelcoat used and number of boats produced. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to resins or gelcoats and those used as cleanup solvents. Records shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC emission limits established in Condition D.1.1.

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

D.1.11 Record Keeping Requirements for PM

(a) To document compliance with Conditions D.1.2 and D.1.7, the Permittee shall maintain a log of weekly overspray observations, Monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

(b) 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 Condition D.1.1 and D.1.2 shall be submitted to the addresses 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.

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for an Administrative Amendment to an Existing Part 70 Permit

Source Background and Description

Source Name:	Starcraft Marine, L.L.C.
Source Location:	201 Starcraft Drive, Topeka, IN 46571
County:	LaGrange
SIC Code:	3732
Operation Permit No.:	T 087-7474-00012
Operation Permit Issuance Date:	June 21, 1999
Third Administrative Amendment No.:	087-18367-00012
Permit Reviewer:	SDF

The Office of Air Quality (OAQ) has reviewed an application from Starcraft Marine, L.L.C., relating to the operation of their existing stationary fiberglass and aluminum boats manufacturing operation.

Request

On November 14, 2003, Starcraft Marine, L.L.C. submitted an application to:

(a) replace gelcoat booth B-4 with a new booth, and

(b) remove gelcoat booth B-5, replace it with paint booth B-8, and exhaust the emissions through Stacks SV94 and SV95.

Replacing gelcoat booth B-4 will not result in an increase in production or emissions, require any changes to any existing permit conditions, or trigger any new applicable requirements because the only item that will be replaced is the booth (the application equipment will be the same) and the booth will be of similar design and capacity as the current existing booth.

Starcraft is also proposing to remove gelcoat booth B-5, replace it with paint booth B-8, and change the exhaust configuration such that the emissions will be exhausted through Stacks SV94 and SV95 instead of SV92 and SV93. Replacing the booth will not result in an increase in production or emissions, require any changes to any existing permit conditions, or trigger any new applicable requirements because the only item that will be replaced is the booth (the application equipment will be the same), paint booth B-8 is similar in capacity and will be modified to have similar particulate controls as existing gelcoat booth B-5, and there will be no replacement to paint booth B-8.

Therefore, the proposed changes shall be incorporated into the existing source Part 70 permit via an administrative amendment pursuant t 326 IAC 2-7-11(a)(7) which states that changes which revise descriptive information where the revision will not trigger a new applicable requirement or violate a permit term may be incorporated into the existing source Part 70 permit via an administrative amendment.

Existing Approvals

The source has been operating under Part 70 permit 087-7474-00012, issued on June 21, 1999, and the following approvals.

(a)	First Administrative Amendment No.:	087-12591-00012	Date Issued:	September 29, 2000
(b)	Second Administrative Amendment No.:	087-18207-00012	Date Issued:	October 28, 2003

Recommendation

The staff recommends to the Commissioner that the administrative amendment 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.

Potential To Emit

The proposed changes will not affect the potential to emit of any emission units.

Justification for Level of Approval

Replacing gelcoat booth B-4 will not result in an increase in production or emissions, require any changes to any existing permit conditions, or trigger any new applicable requirements because the only item that will be replaced is the booth (the application equipment will be the same) and the booth will be of similar design and capacity as the current existing booth.

Starcraft is also proposing to remove gelcoat booth B-5, replace it with paint booth B-8, and change the exhaust configuration such that the emissions will be exhausted through Stacks SV94 and SV95 instead of SV92 and SV93. Replacing the booth will not result in an increase in production or emissions, require any changes to any existing permit conditions, or trigger any new applicable requirements because the only item that will be replaced is the booth (the application equipment will be the same), paint booth B-8 is similar in capacity and will be modified to have similar particulate controls as existing gelcoat booth B-5, and there will be no replacement to paint booth B-8.

Therefore, the proposed changes shall be incorporated into the existing source Part 70 permit via an administrative amendment pursuant t 326 IAC 2-7-11(a)(7) which states that changes which revise descriptive information where the revision will not trigger a new applicable requirement or violate a permit term may be incorporated into the existing source Part 70 permit via an administrative amendment.

County Attainment Status

The source is located in LaGrange County.

Pollutant	Status
PM_{10}	attainment or unclassifiable
SO_2	attainment or unclassifiable
NO_2	attainment or unclassifiable
Ozone	attainment or unclassifiable
CO	attainment or unclassifiable
Lead	attainment or unclassifiable

(a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. LaGrange County has been designated as attainment or unclassifiable for ozone. Therefore, the

VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration, 326 IAC 2-2.

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

Source Status

Source Emissions (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited), as obtained from the Technical Support Document (TSD) of Part 70 permit 087-7474-00012:

Unit	PM (tons/yr)	PM10 (tons/yr)	SO2 (tons/yr)	NOx (tons/yr)	VOC (tons/yr)	CO (tons/yr)	Worst Case Single HAP (tons/yr)	Comb. HAPs (tons/yr)
Source	<100	<100	<100	<100	>100, <250	<100	>10	>25

PSD Major Levels	250	250	250	250	250	250	-	-
Part 70 Major Levels	-	100	100	100	100	100	10	10/25

(a) The existing source is not a major PSD stationary source because the source criteria pollutant emissions are, after all applicable limits and standards, less than or equal to the respective major source levels of 250 tons per year.

(b) The existing source is a Title V major stationary source because the VOC emissions are greater than the applicable level of 100 tons per year, and the single and combined HAP emissions exceed their respective applicable levels of 10 and 25 tons per year.

Emissions After the Changes

The proposed changes will not affect the emissions of any of the source emission units. Therefore, the source after the proposed modification is:

(a) still not a major PSD stationary source because the source criteria pollutant emissions are, after all applicable limits and standards, still less than or equal to the respective major source levels of 250 tons per year.

(b) still a Title V major stationary source because the VOC emissions are greater than the applicable level of 100 tons per year, and the single and combined HAP emissions exceed their respective applicable levels of 10 and 25 tons per year.

Federal Rule Applicability

The proposed changes do not trigger any new applicable federal rules and do not affect any of the existing applicable federal requirements.

State Rule Applicability - Entire Source

The proposed changes do not trigger any new state rules and do not affect any of the existing state rules.

State Rule Applicability - Individual Facilities

The proposed changes do not trigger any new state rules and do not affect any of the existing state rules.

Changes to the Permit

To incorporate the proposed changes into the permit, the following changes shall be made. All added information is indicated in bold type. All deleted information is struck-out.

(a) Condition A.2:

Condition A.2 shall be changed as follows to reflect the proposed changes.

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) Four (4) paint (primer or enamel) booths identified as:
  (i) B-1 exhausting through the stack: SV-83 with a maximum production rate of 100 parts per hour,
  (ii) B-3 exhausting through the stacks: SV-84 and SV-85 with a maximum production rate of 100 parts per hour,
  (iii) B-2 exhausting through the stacks: SV-86 and SV-87 with a maximum production rate of 100 parts per hour, **and**
  (iv) B-6 exhausting through the stacks: SV-88 and SV-89 with a maximum production rate of 2 boats per hour or the equivalent in parts for 2 boats per hour and the use of air assisted airless type spray guns for BACT compliance, ~~and~~
  ~~(v) B-8 exhausting through the stacks: PB-8 with a maximum rate of 2 boats per hour, and~~

  Each booth is equipped with a dry filter to control the PM emissions.

(b) Three (3) gel coat booths identified as:
  (i) B-4 exhausting through the stack: SV-90 and SV-91 with a maximum production rate of 30 parts per hour,
  (ii) B-5 exhausting through the stack: SV-9~~2~~**4** and SV-9~~3~~**5** with a maximum production rate of 30 parts per hour,
  (iii) B-7 exhausting through the stack: SV-94 and SV-95 with a maximum production rate of 1 boat per hour or the equivalent of parts for 1 boat per hour and the use of air assisted airless type spray guns for BACT compliance, and

  Each booth is equipped with a dry filter to control the PM emissions.

.....

(b) Unit Description of Section D.1:

The unit description of Section D.1 shall be changed as follows to reflect the proposed changes.

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

Four (4) paint (primer or enamel) booths identified as:

(i) B-1 exhausting through the stack: SV-83 with a maximum production rate of 100 parts per hour
(ii) B-3 exhausting through the stacks: SV-84 and SV-85 with a maximum production rate of 100 parts per hour
(iii) B-2 exhausting through the stacks: SV-86 and SV-87 with a maximum production rate of 100 parts per hour, **and**
(iv) B-6 exhausting through the stacks: SV-88 and SV-89 with a maximum production rate of 2 boats per hour or the equivalent in parts for 2 boats per hour and the use of air assisted airless type spray guns for BACT compliance, ~~and~~
~~(v) B-8 exhausting through the stacks: PB-8 with a maximum rate of 2 boats per hour, and~~

Each booth is equipped with a dry filter to control the PM emissions.

Three (3) gel coat booths identified as:

(i) B-4 exhausting through the stack: SV-90 and SV-91 with a maximum production rate of 30 parts per hour
(ii) B-5 exhausting through the stack: SV-9~~2~~**4** and SV-9~~3~~**5** with a maximum production rate of 30 parts per hour, **and**
(iii) B-7 exhausting through the stack: SV-94 and SV-95 with a maximum production rate of 1 boat per hour or the equivalent of parts for 1 boat per hour and the use of air assisted airless type spray guns for BACT compliance**.**

Each booth is equipped with dry filter to control the PM emissions.
.....

(c) Condition D.1.9:

Condition D.1.9 shall be changed as follows to remove stacks SV93 and SV94 because the stack no longer exist.

D.1.9 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (SV-83, 84,85, 86, 87, 88, 89, 90, 91, ~~92, 93,~~ 94, 95, 96, 97, 98) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

Conclusion

The owner or operator implement the proposed changes and operate the affected equipment according to the applicable requirements of Administrative Amendment 087-18367-00012, existing source Part 70 permit 087-7474-00012, and all other active existing source approvals.