



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
MC 61-53 IGCN 1003
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

TO: Interested Parties / Applicant
DATE: November 28, 2007
RE: Bennington Marine, LLC / 099-184459-00097
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 impracticable to raise such issues, or if the grounds for such objection arose after the comment period.

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

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

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



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PART 70 OPERATING PERMIT RENEWAL OFFICE OF AIR QUALITY

**Bennington Marine, L.L.C.
1849B Dogwood Road
Bremen, Indiana 46506**

(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.: T099-18459-00097	
Issued by: <i>Original signed by</i> Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: November 28, 2007 Expiration Date: November 28, 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 a stationary plastic and fiberglass boat manufacturing plant.

Source Address:	1849B Dogwood Road, Bremen, Indiana 46506
Mailing Address:	52791 CR 113, Elkhart, Indiana 46514
General Source Phone Number:	(574) 264-6336
SIC Code:	3714
County Location:	Marshall
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source under PSD Rules; Major Source, Section 112 of the Clean Air Act

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 coat booths, constructed in 1992, identified as GC5, GC6 and GC7, each using non-atomized spray, air-assisted airless spray, airless spray, high volume-low pressure spray, or equivalent each with dry filters for particulate matter overspray control, with GC5 exhausting to two (2) stacks, S15 and S14, and GC6, exhausting to two (2) stacks, S13 and S12. GC7 exhausts inside the building and has no overspray controls.
- (b) One (1) resin chop area, constructed in 1992, identified as C4, utilizing non-atomized spray application equipment, exhausting inside the building.

Under NESHAP VVVV, GC5, GC6, GC7 and C4 are considered existing affected sources.

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) Two (2) grinding booths, constructed in 1992, identified as G5 and G6, each with dry filters for particulate matter (PM) control, and each exhausting to one (1) stack, identified as S18 and S17 respectively [326 IAC 6-3-2].

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, T099-18459-00097, 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
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

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

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

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

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

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

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

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

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality,
Compliance Section), or
Telephone Number: 317-233- 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
MC 61-53 IGCN 1003
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 in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

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

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

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

- (a) All terms and conditions of permits established prior to T099-18459-00097 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
MC 61-53 IGCN 1003
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 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
MC 61-53 IGCN 1003
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
MC 61-53 IGCN 1003
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
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

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

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

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

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

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

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

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

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

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

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

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

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

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records 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
MC 61-53 IGCN 1003
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 Stack Height [326 IAC 1-7]

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

C.7 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
MC 61-52 IGCN 1003
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.8 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
MC 61-53 IGCN 1003
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.9 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.10 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
MC 61-53 IGCN 1003
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.11 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.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

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

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

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

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

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

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

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

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

C.13 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.14 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.15 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 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.16 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
MC 61-50 IGCN 1003
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.17 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.18 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
MC 61-53 IGCN 1003
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.19 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 coat booths, constructed in 1992, identified as GC5, GC6 and GC7, each using non-atomized spray, air-assisted airless spray, airless spray, high volume-low pressure spray, or equivalent each with dry filters for particulate matter overspray control, with GC5 exhausting to two (2) stacks, S15 and S14, and GC6, exhausting to two (2) stacks, S13 and S12. GC7 exhausts inside the building and has no overspray controls.
- (b) One (1) resin chop area, constructed in 1992, identified as C4, utilizing non-atomized spray application equipment, exhausting inside the building.

Under NESHAP VVVV, GC5, GC6, GC7 and C4 are considered existing affected sources.

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

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

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

Pursuant to OP 099-6954-00037, issued on January 14, 1999, the Best Available Control Technology (BACT) for the three (3) gel coat booths (GC5, GC6 and GC7) and one (1) resin/chopper booths (C4) that were constructed in 1992 shall be no VOC control with the following work practices:

- (a) use of spray guns with a transfer efficiency of 77%; and
- (b) use of resin with a styrene content less than or equal to 38% by weight.

D.1.2 Emission Standards for Hazardous Air Pollutants for Boat Manufacturing [326 IAC 20-48]

- (a) Pursuant to 326 IAC 20-48-2, in addition to alternative organic HAP content requirements for open molding resin operations contained in Table 2 to Subpart VVVV, 40 CFR 63, compliance with Subpart VVVV may be achieved using the alternative HAP content requirements for gel coat operations contained in 20-48 as follows:

Gel Coat Application		
Operation	Application Method	The weighted average HAP content shall not exceed
Pigmented gel coat	Atomized (spray)	33%
Clear gel coat operations	Atomized (spray)	48%
Tooling Gel Coat	Atomized (spray)	40%
Pigmented Gel Coat	Nonatomized (nonspray)	40%
Clear Gel Coat	Nonatomized (nonspray)	55%
Tooling Gel Coat	Nonatomized (nonspray)	54%

- (b) Pursuant to 326 IAC 20-48-3, the Permittee shall operate the three (3) gel coat booths and one (1) resin chop area in accordance with the following work practice standards:
 - (1) Nonatomizing spray equipment shall not be operated at pressures that atomize the material during the application process.

- (2) Solvents sprayed during cleanup and resin changes shall be directed into solvent collection containers.
- (3) For routine flushing of resin and gel coat application equipment, such as spray guns, flowcoaters, brushes, rollers, and squeegees, owners or operators must use a cleaning solvent that contains no hazardous air pollutants (HAP). However, recycled cleaning solvents that contain less than or equal to five (5) percent HAP by weight are considered to contain no HAP for the purposes of this condition. For removing cured resin or gel coat from application equipment, no organic HAP limit applies.
- (4) Clean-up rags with solvent shall be stored in closed containers.
- (5) Closed containers shall be used for the storage of the following:
 - (A) All production and tooling resins that contain HAP.
 - (B) All production and tooling gel coats that contain HAP.
 - (C) Waste resins and gel coats that contain HAP.
 - (D) Cleaning materials, including waste cleaning materials.
 - (E) Other materials that contain HAP.

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

- (c) Pursuant to 326 IAC 20-48-4 (Operator Training), the Permittee shall comply with following operator training requirements:
 - (1) 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:
 - (A) All personnel hired shall be trained within fifteen (15) days of hiring.
 - (B) To ensure training goals listed in paragraph (c) of this condition is maintained, all personnel shall be given refresher training annually.
 - (C) Personnel who have been trained by another owner or operator subject to this rule are exempt from paragraph (a)(1) of this condition if written documentation that the employee's training is current is provided to the new employer.
 - (2) The lesson plans shall cover, for the initial and refresher training, at a minimum, all of the following topics:
 - (A) Appropriate application techniques.
 - (B) Appropriate equipment cleaning procedures.
 - (C) Appropriate equipment setup and adjustment to minimize material usage and overspray.

- (3) Maintain the following training records on site and available for inspection and review:
 - (A) A copy of the current training program.
 - (B) 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.
- (4) Records of prior training programs and former personnel are not required to be maintained.

D.1.3 Particulate Emission Limitations [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(d), particulate from the from the fiberglass operations in three (3) gel coat booths (GC5, GC6 and GC7) and one (1) resin chop area shall be controlled by a dry particulate filter and the Permittee shall operate the control device in accordance with manufacturer's specifications.

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 these facilities and the associated control device.

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

D.1.5 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 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

D.1.6 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records that are complete and sufficient to establish compliance with the VOC and HAP monomer content limits. Records maintained shall be taken monthly. Examples of such records include but are not limited to:
 - (1) The usage by weight and monomer content of each resin and gel coat used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS), manufacturer's certified product data sheets, and calculations necessary to verify the type, amount used, and HAP content of each resin or gel coat;

- (2) Method of application and other emission reduction techniques for each resin and gel coat used;
 - (3) Monthly calculations demonstrating compliance on an equivalent emissions mass basis if non-compliant resins or gel coats are used during that month.
- (b) To document compliance with Condition D.1.5 the Permittee shall maintain a log of weekly observations and daily and monthly inspections.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.2 FACILITY OPERATION CONDITIONS

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

- (a) Two (2) grinding booths, constructed in 1992, identified as G5 and G6, each with dry filters for particulate matter (PM) control, and each exhausting to one (1) stack, identified as S18 and S17 respectively.

(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 Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the two (2) grinding booths (G5 and G6) shall not exceed 3.5 pounds per hour when operating at a total process weight rate of 1000 pounds per hour.

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

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

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

D.2.2 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 the associated control devices.

Compliance Determination Requirements

D.2.3 Particulate Control

In order to comply with Condition D.2.1, the dry filters for particulate control in the two (2) grinding booths (G5 and G6) shall be properly installed and in good condition at all times that the facilities are in operation.

SECTION E.1 FACILITY OPERATION CONDITIONS

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

- (a) Three (3) gel coat booths, constructed in 1992, identified as GC5, GC6 and GC7, each using non-atomized spray, air-assisted airless spray, airless spray, high volume-low pressure spray, or equivalent each with dry filters for particulate matter overspray control, with GC5 exhausting to two (2) stacks, S15 and S14, and GC6, exhausting to two (2) stacks, S13 and S12. GC7 exhausts inside the building and has no overspray controls.
- (b) One (1) resin chop area, constructed in 1992, identified as C4, utilizing non-atomized spray application equipment, with no direct exhaust.

Under NESHAP VVVV, GC5, GC6, GC7 and C4 are considered existing affected sources.

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

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

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

- (a) Pursuant to 40 CFR 63.5695, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1, as specified in Table 15 of 40 CFR Part 63, Subpart VVVV in accordance with schedule 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
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

E.1.2 NESHAP VVVV Requirements [40 CFR Part 63, Subpart VVVV] [326 IAC 20-48]

Pursuant to CFR Part 63, Subpart VVVV, the Permittee shall comply with the provisions of 40 CFR Part 63.5695, which are incorporated as specified as follows:

What the Subpart Covers

§ 63.5683 Does this subpart apply to me?

(a) This subpart applies to you if you meet both of the criteria listed in paragraphs (a)(1) and (2) of this section.

(1) You are the owner or operator of a boat manufacturing facility that builds fiberglass boats or aluminum recreational boats.

(2) Your boat manufacturing facility is a major source of HAP either in and of itself, or because it is collocated with other sources of HAP, such that all sources combined constitute a major source.

(b) A boat manufacturing facility is a facility that manufactures 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 is not considered a boat manufacturing facility for the purpose of this subpart.

(c) A major source is any 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 (10 tons) or more per year of a single HAP or 22.7 megagrams (25 tons) or more per year of a combination of HAP.

(d) This subpart does not apply to aluminum coating operations on aluminum boats intended for commercial or military (nonrecreational) use, antifoulant coatings, assembly adhesives, fiberglass hull and deck coatings, research and development activities, mold sealing and release agents, mold stripping and cleaning solvents, and wood coatings as defined in § 63.5779. This subpart does not apply to materials contained in handheld aerosol cans.

§ 63.5686 How do I demonstrate that my facility is not a major source?

You can demonstrate that your facility is not a major source by using the procedures in either paragraph (a) or (b) of this section.

(a) *Emission option.* You must demonstrate that your facility does not emit, and does not have the potential to emit as defined in § 63.2, considering federally enforceable permit limits, 9.1 megagrams (10 tons) or more per year of a single HAP or 22.7 megagrams (25 tons) or more per year of a combination of HAP. To calculate your facility's potential to emit, you must include emissions from the boat manufacturing facility and all other sources that are collocated and under common ownership or control with the boat manufacturing facility.

(b) *Material consumption option.* This option can be used if you manufacture either fiberglass boats or aluminum recreational boats at your facility. You must meet the criteria in paragraph (b)(1), (2), or (3) of this section and comply with the requirements in paragraph (c) of this section. If you initially rely on the limits and criteria specified in paragraph (b)(1), (2), or (3) of this section to become an area source, but then exceed the relevant limit (without first obtaining and complying with other limits that keep your potential to emit HAP below major source levels), your facility will then become a major source, and you must comply with all applicable provisions of this subpart beginning on the compliance date specified in § 63.5695. Nothing in this paragraph is intended to preclude you from limiting your facility's potential to emit through other federally enforceable mechanisms available through your permitting authority.

(1) If your facility is primarily a fiberglass boat manufacturing facility, you must demonstrate that you consume less than 45.4 megagrams per rolling 12-month period of all combined polyester- and vinylester-based resins and gel coats (including tooling and production resins and gel coats, and clear gel coats), and you must demonstrate that at least 90 percent of total annual HAP emissions at the facility (including emissions from aluminum recreational boat manufacturing or other source categories) originate from the fiberglass boat manufacturing materials.

(2) If your facility is primarily an aluminum recreational boat manufacturing facility, you must demonstrate that it consumes less than 18.2 megagrams per rolling 12-month period of all combined surface coatings, aluminum wipedown solvents, application gun cleaning solvents, and carpet and fabric adhesives; and you must demonstrate that at least 90 percent of total annual HAP emissions at the facility (including emissions from fiberglass boat manufacturing or other source categories) originate from the aluminum recreational boat manufacturing materials.

(3) If your facility is a fiberglass boat or an aluminum recreational boat manufacturing facility, you must demonstrate that the boat manufacturing materials consumed per rolling 12-month period contain a total of less than 4.6 megagrams of any single HAP and less than 11.4 megagrams of all combined HAP, and you must demonstrate that at least 90 percent of total annual HAP emissions at the facility (including emissions from other source categories) originate from these boat manufacturing materials.

(c) If you use the material consumption option described in paragraph (b) of this section to demonstrate that you are not a major source, you must comply with the requirements of paragraphs (c)(1) through (3) of this section.

(1) If your facility has HAP emissions that do not originate from boat manufacturing operations or materials described in paragraph (b), then you must keep any records necessary to demonstrate that the 90 percent criterion is met.

(2) A rolling 12-month period includes the previous 12 months of operation. You must maintain records of the total amount of materials described in paragraph (b) of this section used each month, and, if necessary, the HAP content of each material and the calculation of the total HAP consumed each month. Because records are needed for a 12-month period, you must keep records beginning no later than 12 months before the compliance date specified in § 63.5695. Records must be kept for 5 years after they are created.

(3) In determining whether the 90 percent criterion included in paragraph (b) of this section is met, you do not need to include materials used in routine janitorial, building, or facility grounds maintenance; personal uses by employees or other persons; or products used for maintaining motor vehicles operated by the facility.

§ 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) Aluminum hull and deck coating operations, including solvent wipedown operations and paint spray gun cleaning operations, on aluminum recreational boats.

§ 63.5692 How do I know if my boat manufacturing facility is a new source or an existing source?

(a) A boat manufacturing facility is a new source if it meets the criteria in paragraphs (a)(1) through (3) of this section.

(1) You commence construction of the affected source after July 14, 2000.

(2) It is a major source.

(3) It is a completely new boat manufacturing affected source where no other boat manufacturing affected source existed prior to the construction of the new source.

(b) For the purposes of this subpart, an existing source is any source that is not a new source.

§ 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 What emission limit must I meet 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.

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

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

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

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

M_{TG} = 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 life-saving appliances approved under 46 CFR subchapter Q or the construction of small passenger vessels regulated by 46 CFR subchapter T. Production resins for which this exemption is used must be applied with nonatomizing (non-spray) resin application equipment. 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 your 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 your 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 What are my options for complying with the open molding emission limit?

You must use one or more of the options listed in paragraphs (a) through (c) of this section to meet the emission limit in § 63.5698 for the resins and gel coats used in open molding operations at your 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) Those operations and materials not included in the emissions average must comply with either paragraph (b) or (c) of this section.

(b) *Compliant materials option.* Demonstrate compliance by using resins and gel coats that meet the organic HAP content requirements in Table 2 to this subpart. Compliance with this option is based on a 12-month rolling average.

§ 63.5704 What are the 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.
- (b) *Compliant materials option.* For each open molding operation complying using the compliant materials option, you must demonstrate compliance by performing the steps in paragraphs (b)(1) through (4) 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 §63.5713 to show that the weighted-average organic HAP content does not exceed the limit specified in Table 2 to this subpart.
 - (3) Keep records as specified in paragraphs (b)(3)(i) through (iv) of this section for each resin and gel coat.

- (i) Hazardous air pollutant content.
 - (ii) Application method for production resin and tooling resin. This record is not required if all production resins and tooling resins are applied with nonatomized technology.
 - (iii) Amount of material used per month. This record is not required for an operation if all materials used for that operation comply with the organic HAP content requirements.
 - (iv) Calculations performed, if required, to demonstrate compliance based on weighted-average organic HAP content as described in §63.5713.
- (4) Submit semiannual compliance reports to the Administrator as specified in §63.5764.

§ 63.5707 What is an implementation plan for open molding operations and when do I need to prepare one?

- (a) You must prepare an implementation plan for all open molding operations for which you 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, your 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 your next semiannual compliance report specified in § 63.5764.

§ 63.5710 How do I demonstrate 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 your 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.

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

Where:

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

(d) You must use the equations in Table 3 to this subpart to calculate the MACT model point value (PV_i) 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.

§ 63.5713 How do I demonstrate compliance using compliant materials?

(a) Compliance using the organic HAP content requirements listed in Table 2 to this subpart is based on a 12-month rolling average that is calculated at the end of every month. The first 12-month rolling-average period begins on the compliance date specified in §63.5695. If you are using filled material (production resin or tooling resin), you must comply according to the procedure described in §63.5714.

(b) At the end of the twelfth month after your compliance date and at the end of every subsequent month, review the organic HAP contents of the resins and gel coats used in the past 12 months in each operation. If all resins and gel coats used in an operation have organic HAP contents no greater than the applicable organic HAP content limits in Table 2 to this subpart, then you are in compliance with the emission limit specified in §63.5698 for that 12-month period for that operation. In addition, you do not need to complete the weighted-average organic HAP content calculation contained in paragraph (c) of this section for that operation.

(c) At the end of every month, you must use equation 1 of this section to calculate the weighted-average organic HAP content for all resins and gel coats used in each operation in the past 12 months.

$$\text{Weighted-Average HAP Content (\%)} = \frac{\sum_{i=1}^n (M_i \text{ HAP}_i)}{\sum_{i=1}^n (M_i)} \quad (\text{Eq. 1})$$

Where:

M_i = mass of open molding resin or gel coat i used in the past 12 months in an operation, megagrams.

HAP_i = Organic HAP content, by weight percent, of open molding resin or gel coat i used in the past 12 months in an operation. Use the methods in §63.5758 to determine organic HAP content.

n = number of different open molding resins or gel coats used in the past 12 months in an operation.

(d) If the weighted-average organic HAP content does not exceed the applicable organic HAP content limit specified in Table 2 to this subpart, then you are in compliance with the emission limit specified in §63.5698.

§ 63.5714 How do I demonstrate compliance if I use filled resins?

(a) If you are using a filled production resin or filled tooling resin, you must demonstrate compliance for the filled material on an as-applied basis using equation 1 of this section.

$$PV_F = PV_u \times \frac{(100 - \% \text{ Filler})}{100} \quad (\text{Eq. 1})$$

Where:

PV_F = The as-applied MACT model point value for a filled production resin or tooling resin, kilograms organic HAP per megagram of filled material.

PV_u = The MACT model point value for the neat (unfilled) resin, before filler is added, as calculated using the formulas in Table 3 to this subpart.

% Filler = The weight-percent of filler in the as-applied filled resin system.

(b) If the filled resin is used as a production resin and the value of PV_F calculated by equation 1 of this section does not exceed 46 kilograms of organic HAP per megagram of filled resin applied, then the filled resin is in compliance.

(c) If the filled resin is used as a tooling resin and the value of PV_F calculated by equation 1 of this section does not exceed 54 kilograms of organic HAP per megagram of filled resin applied, then the filled resin is in compliance.

(d) If you are including a filled resin in the emissions averaging procedure described in §63.5710, then use the value of PV_F calculated using equation 1 of this section for the value of PV_i in equation 2 of §63.5710.

Standards for Resin and Gel Coat Mixing Operations

§ 63.5731 What standards must I meet 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.

Standards for Resin and Gel Coat Application Equipment Cleaning Operations

§ 63.5734 What standards must I meet 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 HAP-containing solvents used for removing cured resin or gel coat in containers with covers. The covers must have no visible gaps and must be in place at all times, except when equipment to be cleaned is placed in or removed from the container. On containers with a capacity greater than 7.6 liters, the distance from the top of the container to the solvent surface must be no less than 0.75 times the diameter of the container. Containers that store organic HAP-containing solvents used for removing cured resin or gel coat are exempt from the requirements of 40 CFR part 63, subpart T. Cured resin or gel coat means resin or gel coat that has changed from a liquid to a solid.

§ 63.5737 How do I demonstrate 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.

Methods for Determining Hazardous Air Pollutant Content

§ 63.5758 How do I determine 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 your 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 non-aqueous 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.

(b) *Determine the volume fraction solids in aluminum recreational boat surface coatings*. To determine the volume fraction of coating solids (liters of coating solids per liter of coating) for each aluminum recreational boat surface coating, you must use one of the methods specified in paragraphs (b)(1) through (3) of this section. If the results obtained with paragraphs (b)(2) or (3) of this section do not agree with those obtained according to paragraph (b)(1) of this section, you must use the results obtained with paragraph (b)(1) of this section to determine compliance.

(1) *ASTM Method D2697–86(1998) or D6093–97.* You may use ASTM Method D2697–86(1998) or D6093–97 (available for purchase from ASTM) to determine the volume fraction of coating solids for each coating. Divide the nonvolatile volume percent obtained with the methods by 100 to calculate volume fraction of coating solids.

(2) *Information from the supplier or manufacturer of the material.* You may obtain the volume fraction of coating solids for each coating from the supplier or manufacturer.

(3) *Calculation of volume fraction of coating solids.* You may determine it using equation 1 of this section:

$$\text{Solids} = 1 - \frac{m_{\text{volatiles}}}{D_{\text{avg}}} \quad (\text{Eq. 1})$$

Where:

Solids = volume fraction of coating solids, liters coating solids per liter coating.

$m_{\text{volatiles}}$ = Total volatile matter content of the coating, including organic HAP, volatile organic compounds, water, and exempt compounds, determined according to Method 24 in appendix A of 40 CFR part 60, grams volatile matter per liter coating.

D_{avg} = average density of volatile matter in the coating, grams volatile matter per liter volatile matter, determined from test results using ASTM Method D1475–90 (available for purchase from ASTM), information from the supplier or manufacturer of the material, or reference sources providing density or specific gravity data for pure materials. If there is disagreement between ASTM Method D1475–90 test results and other information sources, the test results will take precedence.

(c) *Determine the density of each aluminum recreational boat wipedown solvent and surface coating.* Determine the density of all aluminum recreational boat wipedown solvents, surface coatings, thinners, and other additives from test results using ASTM Method D1475–90, information from the supplier or manufacturer of the material, or reference sources providing density or specific gravity data for pure materials. If there is disagreement between ASTM Method D1475–90 test results and other information sources, you must use the test results to demonstrate compliance.

Notifications, Reports, and Records

§ 63.5761 What notifications must I submit and when?

(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 What reports must I submit and when?

(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 your 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 your source in § 63.5695. If your source is controlled by an add-on control device, the first compliance report must cover the period beginning on the compliance date specified for your source in § 63.5695 and ending on June 30 or December 31, whichever date is the first date following the end of the first calendar half after the compliance date that is specified for your 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 your facility was in compliance for the 12- month averaging period that ended at the end of the reporting period.

(d) If your facility has an add-on control device, you must submit semiannual compliance reports and quarterly excess emission reports as specified in § 63.10(e). The contents of the reports are specified in § 63.10(e).

(e) If your facility has an add-on control device, you must complete a startup, shutdown, and malfunction plan as specified in § 63.6(e), and you must submit the startup, shutdown, and malfunction reports specified in § 63.10(e)(5).

§ 63.5767 What records must I keep?

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

(b) You must keep all documentation supporting any notification or report that you 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), you 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 weight-percent. For open molding production resin and tooling resin, you must also record the amounts of each applied by atomized and nonatomized methods.

(2) The total amount of each aluminum coating used per month (including primers, top coats, clear coats, thinners, and activators) and the weighted-average organic HAP content as determined in § 63.5752.

(3) The total amount of each aluminum wipedown solvent used per month and the weighted-average organic HAP content as determined in § 63.5749.

(d) If your facility has an add-on control device, you must keep the records specified in § 63.10(b) relative to control device startup, shut down, and malfunction events; control device performance tests; and continuous monitoring system performance evaluations.

§ 63.5770 In what form and for how long must I keep my records?

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

(b) You must keep each record for 5 years following the date that each record is generated.

(c) You must keep each record on site for at least 2 years after the date that each record is generated. You can keep the records offsite for the remaining 3 years.

(d) You can keep the records on paper or an alternative media, such as microfilm, computer, computer disks, magnetic tapes, or on microfiche.

Other Information You Need To Know

§ 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 § 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) § 63.5698—Emission limit for open molding resin and gel coat operations.
- (ii) § 63.5728—Standards for closed molding resin operations.
- (iii) § 63.5731(a)—Standards for resin and gel coat mixing operations.
- (iv) § 63.5734—Standards for resin and gel coat application equipment cleaning operations.
- (v) § 63.5740(a)—Emission limit for carpet and fabric adhesive operations.
- (vi) § 63.5743—Standards for aluminum recreational boat surface coating operations.
- (vii) § 63.5746(g)—Approval of alternative means of demonstrating compliance with the emission limits for aluminum recreational boat surface coating operations.

(2) Under § 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) § 63.5719(b)—Method for determining whether an enclosure is a total enclosure.
- (ii) § 63.5719(c)—Methods for measuring emissions from a control device.
- (i) § 63.5725(d)(1)—Performance specifications for thermal oxidizer combustion temperature monitors.
- (iv) § 63.5758—Method for determining hazardous air pollutant content of regulated materials.

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

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

Definitions

§ 63.5779 What definitions apply to this subpart?

Terms used in this subpart are defined in the Clean Air Act, in § 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.

Tables to Subpart VVVV

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
1. An existing source	... Is a major source on or before August 22, 2001 ¹	August 23, 2004.

¹Your 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 §§ 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 application method	You must not exceed this weight-ed-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		
5. Tooling resin operations	Any method	48 percent
6. Tooling resin operations	Atomized (spray)	30 percent.
7. Tooling gel coat operations	Nonatomized (nonspray)	39 percent.
	Any method	40 percent.

Table 3 to Subpart VVVV-MACT Model Point Value Formulas for Open Molding Operations ¹

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	$0.014 \times (\text{Resin HAP}\%)^{2.425}$
	b. Atomized, plus vacuum bagging with roll-out	$0.01185 \times (\text{Resin HAP}\%)^{2.425}$
	c. Atomized, plus vacuum bagging without roll-out	$0.00945 \times (\text{Resin HAP}\%)^{2.425}$
	d. Nonatomized	$0.014 \times (\text{Resin HAP}\%)^{2.275}$
	e. Nonatomized, plus vacuum bagging with roll-out	$0.0110 \times (\text{Resin HAP}\%)^{2.275}$
	f. Nonatomized, plus vacuum bagging without roll-out	$0.0076 \times (\text{Resin HAP}\%)^{2.275}$
2. Pigmented gel coat, clear gel coat, tooling gel coat	All methods	$0.445 \times (\text{Gel coat HAP}\%)^{1.675}$

¹Equations calculate MACT model point value in kilograms of organic HAP per megagrams of resin or gel coat applied. The equations for vacuum bagging with roll-out are applicable when a facility rolls out the applied resin and fabric prior to applying the vacuum bagging materials. The equations for vacuum

bagging without roll-out are applicable when a facility applies the vacuum bagging materials immediately after resin application without rolling out the resin and fabric.
 HAP% = organic HAP content as supplied, expressed as a weight-percent value between 0 and 100 percent.

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 of Part 63—Default Organic HAP Contents of Petroleum Solvent Groups

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 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 § 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 § 63.9(b)(2).	No later than the dates specified in § 63.9(b)(2).
4. Is complying with organic HAP content limits, application equipment requirements; or MACT model point value averaging provisions.	A notification of compliance status as specified in § 63.9(h).	No later than 30 calendar days after the end of the first 12-month averaging period after your facility's compliance date.

Table 8 to Subpart VVVV—Applicability of General Provisions (40 CFR Part 63, Subpart A) to Subpart VVVV

As specified in § 63.5773, you must comply with the applicable requirements of the General Provisions according to the following table:

Citation	Requirement	Applies to subpart VVVV	Explanation
§ 63.1(a).....	General Applicability.....	Yes.	
§ 63.1(b).....	Initial Applicability Determination....	Yes.	
§63.1(c)(1).....	Applicability After Standard Established.....	Yes.	
§ 63.1(c)(2).....	Yes.....	Area sources are not regulated by subpart VVVV.
§ 63.1(c)(3).....	No.....	[Reserved]
§ 63.1 (c)(4)–(5)...	Yes.	
§ 63.1(d).....	No.....	[Reserved]
63.1(e).....	Applicability of Permit Program....	Yes.	
§ 63.2.....	Definitions.....	Yes.....	Additional definitions are found in § 63.5779.
§ 63.3.....	Units and Abbreviations.....	Yes.	
§ 63.4(a).....	Prohibited Activities.....	Yes.	
§ 63.4(b)–(c).....	Circumvention/Severability.....	Yes.	
§ 63.5(a).....	Construction/Reconstruction.....	Yes.	
§ 63.5(b).....	Requirements for Existing, Newly Constructed, and Reconstructed Sources.....	Yes.	
§ 63.5(c).....	No.....	[Reserved]
§ 63.5(d).....	Application for Approval of Construction/Reconstruction.	Yes.	
§ 63.5(e).....	Approval for Construction/Reconstruction	Yes.	
§ 63.5(f).....	Approval for Construction/Reconstruction based on prior State Review.	Yes.	
§ 63.6(a).....	Compliance with Standards and Maintenance Requirements-Applicability.	Yes.	
§ 63.6(b).....	Compliance Dates for New and Reconstructed Sources.	Yes.....	§ 63.695 specifies compliance dates, including the compliance date for new area sources that become major sources after the effective date of the rule.
§ 63.6(c).....	Compliance Dates for Existing Sources	Yes.....	§ 63.5695 specifies compliance dates, including the compliance date for existing area sources

§ 63.6(d).....	No.....	that become major sources after the effective date of the rule.
§ 63.6(e)(1)–(2).....	Operation and Maintenance Requirements.	No.....	[Reserved]
§ 63.6(e)(3).....	Startup, Shut Down, and Malfunction Plants.	Yes.....	Operating requirements for open molding operations with add-on controls are specified in § 63.5725.
§ 63.6(f).....	Compliance with Nonopacity Emission Standards	Yes.	Only sources with add-on controls must complete startup, shutdown, and mal-function plans.
§ 63.6(g).....	Use of an Alternate Nonopacity Emission Standard	Yes.	
§ 63.6(h).....	Compliance with Opacity/Visible Emissions Standards.	No.....	Subpart VVVV does not specify opacity or visible emission standards.
§ 63.6(i).....	Extension of Compliance with Emission Standards.	Yes.	
§ 63.6(j).....	Exemption from Compliance with Emission Standards.	Yes.	
§ 63.7(a)(1).....	Performance Test Requirements.....	Yes.	
§ 63.7(a)(2).....	Dates for performance tests.....	No.....	§ 63.5716 specifies performance test dates.
§ 63.7(a)(3).....	Performance testing at other times.....	Yes.	
§ 63.7(b)–(h).....	Other performance testing requirements	Yes.	
§ 63.8(a)(1)–(2).....	Monitoring Requirements – Applicability	Yes.....	All of § 63.8 applies only to sources with add-on controls. Additional monitoring requirements for sources with add-on controls are found in § 63.5725.
§ 63.8(a)(3).....	No.....	[Reserved]
§ 63.8(a)(4).....	No.....	Subpart VVVV does not refer directly or indirectly to § 63.11.
§ 63.8(b)(1).....	Conduct of Monitoring.....	Yes.	
§ 63.8(b)(2)–(3).....	Multiple Effluents and Multiple Continuous Monitoring Systems (CMS).	Yes.....	Applies to sources that use a CMS on the control device stack.
§ 63.8(c)(1)–(4).....	Continuous Monitoring System Operation and Maintenance.	Yes.	
§ 63.8(c)(5).....	Continuous Opacity Monitoring Systems (COMS).	No.....	Subpart VVVV does not have opacity or visible emission standards.
§ 63.8(c)(6)–(8).....	Continuous Monitoring System Calibration Checks and Out-of-Control Periods.	Yes.	
§ 63.8(d).....	Quality Control Program.....	Yes.	
§ 63.8(e).....	CMS Performance Evaluation.....	Yes.	
§ 63.8(f)(1)–(5).....	Use of an Alternate Monitoring Method		
§ 63.8(f)(6).....	Alternative to Relative Accuracy Test.....	Yes.....	Applies only to source that use continuous emission monitoring systems (CEMS)
§ 63.8(g).....	Data Reduction.....	Yes.....	
§ 63.9(a).....	Notification Requirements – Applicability	Yes.	
§ 63.9(b).....	Initial Notifications.....	Yes.....	
§ 63.9(c).....	Request for Compliance Extension.....	Yes.	
§ 63.9(d).....	Notification that a New Source is Subject to Special Compliance Requirements.	Yes.	
§ 63.9(e).....	Notification of Performance Test.....	Yes.....	Applies only to sources with add-on controls.

§ 63.9(f).....	Notification of Visible Emissions/Opacity Test.	No.....	Subpart VVVV does not have opacity or visible emission standards.
§ 63.9(g)(1).....	Additional CMS Notifications- Date of CMS Performance Evaluation.	Yes.....	Applies only to sources with add-on controls.
§ 63.9(g)(2).....	Use of COMS Data.....	No.....	Subpart VVVV does not require the use of COMS.
§ 63.9(g)(3).....	Alternative to Relative Accuracy Testing	Yes.....	Applies only to sources with CEMS.
§ 63.9(h).....	Notification of Compliance Status	Yes.	
§ 63.9(i).....	Adjustment of Deadlines.....	Yes.	
§ 63.9(j).....	Change in Previous Information.....	Yes.	
§ 63.10(a).....	Recordkeeping/Reporting – Applicability	Yes.	
§ 63.10(b)(1).....	General Recordkeeping Requirements....	Yes.....	§§ 63.567 and 63.5770 specify additional recordkeeping requirements.
§ 63.10(b)(2)(i)–(xi)	Recordkeeping Relevant to Startup, Shutdown, and Malfunction Periods and CMS.	Yes.....	Applies only to sources with add-on controls.
§ 63.10(b)(2)(xii)–(xiv).....	General Recordkeeping Requirements...	Yes.	
§ 63.10(b)(3).....	Recordkeeping Requirements for Applicability Determinations.	Yes.....	§ 63.5686 specifies applicability determinations for non-major sources.
§ 63.10(c).....	Additional Recordkeeping for Sources with CMS	Yes.....	Applies only to sources with add-on controls.
§ 63.10(d)(1).....	General Reporting Requirements	Yes.....	§ 63.5764 specifies additional reporting requirements.
§ 63.10(d)(2).....	Performance Test Results.....	Yes.....	§ 63.5764 specifies additional requirements for reporting performance test results.
§ 63.10(d)(3).....	Opacity or Visible Emissions Observations.	No.....	Subpart VVVV does not specify opacity or visible emission standards.
§ 63.10(d)(4).....	Progress Reports for Sources with Compliance Extensions.	Yes.	
§ 63.10(d)(5).....	Startup, Shutdown, and Malfunction Reports.	Yes.....	Applies only to sources with add-on controls.
§ 63.10(e)(1).....	Additional CMS Reports – General	Yes.....	Applies only to sources with add-on controls.
§ 63.10(e)(2).....	Reporting Results of CMS Performance Evaluations.	Yes.....	Applies only to sources with add-on controls.
§ 63.10(e)(3).....	Excess Emission/CMS Performance Reports.	Yes.....	Applies only to sources with add-on controls.
§ 63.10(e)(4).....	COMS Data Reports.....	No.....	Subpart VVVV does not specify opacity or visible emission standards.
§ 63.10(f).....	Recordkeeping/Reporting Waiver.....	Yes.	
§ 63.11.....	Control Device Requirements - Applicability	No.....	Facilities subject to subpart VVVV do not use flares as control devices.
§ 63.12.....	State Authority and Delegations.....	Yes.....	§ 63.5776 lists those sections of subpart A that are not delegated.
§ 63.13.....	Addresses.....	Yes.	
§ 63.14.....	Incorporation by Reference.....	Yes.	
§ 63.15.....	Availability of Information/Confidentiality	Yes.	

E.1.3 One Time Deadlines Relating to NESHAP for Boat Manufacturing [40 CFR Part 63, Subpart VVVV]

- (a) The Permittee must submit a revised Initial Notification Report no later than fifteen (15) days after the date of issuance of this permit.

- (b) The Permittee shall submit a revised Notification of Compliance Status Report no later than thirty (30) days after the date of issuance of this permit.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Bennington Marine, L.L.C
Source Address: 1849B Dogwood Road, Bremen, Indiana 46506
Mailing Address: 52791 CR 113, Elkhart, Indiana 46514
Part 70 Permit No.: T099-18459-00097

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
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
Phone: 317-233-0178
Fax: 317-233-6865**

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: Bennington Marine, L.L.C
Source Address: 1849B Dogwood Road, Bremen, Indiana 46506
Mailing Address: 52791 CR 113, Elkhart, Indiana 46514
Part 70 Permit No.: T099-18459-00097

This form consists of 2 pages

Page 1 of 2

<input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12)
X The Permittee 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
X 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 OPERATING PERMIT
 QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Bennington Marine, L.L.C.
 Source Address: 1849B Dogwood Road, Bremen, Indiana 46506
 Mailing Address: 52791 CR 113, Elkhart, Indiana 46514
 Part 70 Permit No.: T099-18459-00097

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

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

Source Background and Description

Source Name:	Bennington Marine, L.L.C.
Source Location:	1849B Dogwood Road, Bremen, Indiana 46506
County:	Marshall
SIC Code:	3714
Operating Permit No.:	T099-6954-00037
Operating Permit Issuance Date:	January 14, 1999
Permit Renewal No.:	T099-18459-00097
Permit Reviewer:	Ganesh Srinivasan/EVP

On August 20, 2007, the Office of Air Quality (OAQ) had a notice published in the Plymouth Pilot News, Plymouth, Indiana, stating that Bennington Marine, L.L.C. had applied for a Title V Permit Renewal T099-18459-00097. 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 19, 2007, OAQ received comments from Bennington Marine, L.L.C on the proposed Part 70 permit renewal. The summary of the comments and corresponding responses are shown below. Changes made to the permit as a result of the comments are shown in **bold** and deleted permit language is shown with a ~~line through it~~. Any permit changes affecting the permit's Table of Contents are also revised without replication herein.

Comment 1:

The source history on Page 1 of the TSD states that Charleston Corporation is primarily engaged in the manufacture of plastic guttering and siding. Charleston Corporation is a fiberglass and plastic parts manufacturer of boat and non-boat parts, with a SIC of 3714.

Response 1:

The source history on Page 1 of the TSD incorrectly states that Charleston Corporation is primary engaged in the manufacture of plastic guttering and siding. Charleston Corporation is a fiberglass and plastic parts manufacturer of boat and non-boat parts. Bennington Marine, LLC. and Charleston Corporation are still considered two separate sources. There are no changes to the permit as a result of this comment.

Comment 2:

In Condition E.1.2 under Subpart VVVV, please add 40 CFR 63.5731 (a), (b), (c) and (d) related to gelcoat mixing operations which is performed at the facility.

Response 2:

Condition E.1.2 has been modified to include 40 CFR 63.5731 (a), (b), (c) and (d) as shown below:

E.1.2 NESHAP VVVV Requirements [40 CFR Part 63, Subpart VVVV] [326 IAC 20-48]

Standards for Resin and Gel Coat Mixing Operations

§ 63.5731 What standards must I meet 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.

IDEM, OAQ Changes:

Upon further review, IDEM has made the following modifications to the proposed permit:

1. Condition C.16 has been updated as shown:

C.16 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 ~~2004~~ **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:

2. Condition D.1.2 has been modified for clarity:

D.1.2 Emission Standards for Hazardous Air Pollutants for Boat Manufacturing [326 IAC 20-48]

- (a) Pursuant to 326 IAC 20-48-2, in addition to alternative organic HAP content requirements for open molding resin operations contained in Table 2 to Subpart VVVV, 40 CFR 63, **compliance with Subpart VVVV may be achieved** using the alternative HAP content requirements for gel coat operations **contained in 20-48** as follows:

Gel Coat Application		
Operation	Application Method	The weighted average HAP content shall not exceed
Pigmented gel coat	Atomized (spray)	33%
Clear gel coat operations	Atomized (spray)	48%
Tooling Gel Coat	Atomized (spray)	40%
Pigmented Gel Coat	Nonatomized (nonspray)	40%
Clear Gel Coat	Nonatomized (nonspray)	55%
Tooling Gel Coat	Nonatomized (nonspray)	54%

(b) Pursuant to 326 IAC 20-48-3, the Permittee shall operate the three (3) gel coat booths and one (1) resin chop area in accordance with the following work practice standards:

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

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

(c) Pursuant to 326 IAC 20-48-4 (Operator Training), the Permittee shall comply with following operator training requirements:

- (1)(a) Train all new and existing personnel, including contract personnel, who are involved in resin and gel coat spraying and applications that could result in excess emissions if performed improperly according to the following schedule:
 - (A)(1) All personnel hired shall be trained within fifteen (15) days of hiring.
 - (B)(2) To ensure training goals listed in paragraph (c) of this condition is

- maintained, all personnel shall be given refresher training annually.
- (C)(3) Personnel who have been trained by another owner or operator subject to this rule are exempt from paragraph (a)(1) of this condition if written documentation that the employee's training is current is provided to the new employer.
 - (2)(b) The lesson plans shall cover, for the initial and refresher training, at a minimum, all of the following topics:
 - (A)(1) Appropriate application techniques.
 - (B)(2) Appropriate equipment cleaning procedures.
 - (C)(3) Appropriate equipment setup and adjustment to minimize material usage and overspray.
 - (3)(e) Maintain the following training records on site and available for inspection and review:
 - (A)(1) A copy of the current training program.
 - (B)(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.
 - (4)(d) Records of prior training programs and former personnel are not required to be maintained.

3. Condition D.2.3 has been modified for clarity:

D.2.3 Particulate Control

In order to comply with Condition D.2.1, the dry filters for particulate control ~~shall be in operation and control emissions from~~ in the two (2) grinding booths (G5 and G6) **shall be properly installed and in good condition** at all times that the facilities are in operation.

4. Condition E.1.3 has been modified to remove the Initial Performance Tests since the source is not required to perform them. The date of submission of the Notification of Compliance Status Report has also been updated:

E.1.3 One Time Deadlines Relating to NESHAP for Boat Manufacturing [40 CFR Part 63, Subpart VVVV]

- ~~(a) The Permittee must conduct the initial performance tests by August 23, 2007.~~
- ~~(b) The Permittee must submit a notification of compliance status report for source by September 22, 2007.~~
- (a) **The Permittee must submit a revised Initial Notification Report no later than fifteen (15) days after the date of issuance of this permit.**
- (b) **The Permittee shall submit a revised Notification of Compliance Status Report no later than thirty (30) days after the date of issuance of this permit.**

**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:	Bennington Marine, L.L.C.
Source Location:	1849B Dogwood Road, Bremen, Indiana 46506
County:	Marshall
SIC Code:	3714
Operating Permit No.:	T099-6954-00037
Operating Permit Issuance Date:	January 14, 1999
Permit Renewal No.:	T099-18459-00097
Permit Reviewer:	Ganesh Srinivasan/EVP

The Office of Air Quality (OAQ) has reviewed a Part 70 Operating Permit Renewal application from Bennington Marine, L.L.C. relating to the operation of a fiberglass and plastic manufacturing plant that produces miscellaneous boat parts.

Source History

Bennington Marine, LLC (source number 99-00097) is located at 1849B Dogwood Road, Bremen and Charleston Corporation (source number 99-00037) is located at 1849A Dogwood Road, Bremen. IDEM, OAQ examined whether these two plants should be considered one "major source" as defined at 326 IAC 2-7-1(22). In order for these two plants to be considered one major source, they must meet all three of the following criteria:

- (1) The plants must be under common ownership or common control;
- (2) The plants must have the same two-digit Standard Industrial Classification (SIC) Code or one must serve as a support facility for the other; and,
- (3) The plants must be located on contiguous or adjacent properties.

On March 22, 1999, all the equipment in both plants was included by IDEM, OAQ in Title V Operating Permit (TVOP) T099-6954-00037 issued to Charleston Corporation to manufacture marine and non-marine fiberglass products. On March 3, 2003, IDEM, OAQ approved a name change for the TVOP to Charleston Corporation and Bennington Marine Corporation. Both corporations had the same owner. On December 11, 2003, IDEM, OAQ approved a second name change to Charleston Corporation and Bennington Marine LLC, reflecting that Bennington Marine LLC had purchased the marine manufacturer, Bennington Marine Corporation. Charleston Corporation continues to manufacture non-marine products as well as some marine products. Bennington Marine LLC and Charleston Corporation are not owned by the same person or persons.

The plants do not have the same two-digit Standard Industrial Classification (SIC) Code. Charleston Corporation is primarily engaged in the manufacture of plastic guttering and siding. It has the two-digit SIC Code of 30 for Rubber and Miscellaneous Plastics Products. Bennington Marine LLC is primarily engaged in the production of boats. It has the two-digit SIC Code of 37 for Transportation Equipment. Neither plant serves as a support facility for the other. A support facility is a plant that dedicates at least 50% of its output to another plant. None of the products produced by either plant is sent to the other.

IDEM, OAQ finds that Bennington Marine LLC and Charleston Corporation do not meet the criteria of 326 IAC 2-7-1(22). They are not one major source and will be permitted as separate sources.

Permitted Emission Units and Pollution Control Equipment

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

- (a) Three (3) gel coat booths, constructed in 1992, identified as GC5, GC6 and GC7, each using non-atomized spray, air-assisted airless spray, airless spray, high volume-low pressure spray, or equivalent each with dry filters for particulate matter overspray control, with GC5 exhausting to two (2) stacks, S15 and S14, and GC6, exhausting to two (2) stacks, S13 and S12. GC7 exhausts inside the building and has no overspray controls.
- (b) One (1) resin chop area, constructed in 1992, identified as C4, utilizing non-atomized spray application equipment, exhausting inside the building.

Under NESHAP VVVV, GC5, GC6, GC7 and C4 are considered existing affected sources.

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) Two (2) grinding booths, constructed in 1992, identified as G5 and G6 each with dry filters for particulate matter (PM) control, and each exhausting to one (1) stack, identified as S18 and S17 respectively [326 IAC 6-3-2];
- (b) Urethane Foam Application: Spray foam is applied in a booth, identified as F1, exhausting to one stack, S16. Pour foam is applied in the general manufacturing area exhausting inside the building;
- (c) Structural Adhesive Application: The structural adhesive is applied to bond fiberglass to fiberglass in the general manufacturing area exhausting inside the building;
- (d) Natural gas-fired combustion air make-up units and heaters including:
 - (1) Two (2) Aerovent MAU heaters, each rated at 3.0 MMBTU per hour;
 - (2) One (1) Thermo Cycler, rated at 0.4 MMBTU per hour;
 - (3) Two (2) radiant heaters, each rated at 0.15 MMBTU per hour; and
 - (4) Amana furnace, rated at 0.056 MMBTU per hour.
- (e) Combustion source flame safety purging on startup;
- (f) Closed loop heating and cooling systems;
- (g) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment;
- (h) Paved and unpaved roads and parking lots with public access;
- (i) Asbestos abatement projects regulated by 326 IAC 14-10;
- (j) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment;

- (k) On-site fire and emergency response training approved by the department;
- (l) Filter or coalesce media changeout;
- (m) Final finish repair of fiberglass, with VOC emissions less than 3 pounds per hour or 15 pounds per day;
- (n) Mold making paint, with VOC emissions less than 3 pounds per hour or 15 pounds per day;
- (o) Miscellaneous fillers and sealants usage, with VOC emissions less than 3 pounds per hour or 15 pounds per day;
- (p) One (1) 7000 gallon resin storage tank, with VOC emissions less than 3 pounds per hour or 15 pounds per day.

Existing Approvals

The source has constructed or has been operating under the following previous approvals:

- (a) Operating Permit, T099-6954-00037, issued on January 14, 1999;
- (b) First Administrative Amendment 099-10918-00037, issued on June 22, 1999;
- (c) Second Administrative Amendment 099-14269-00037, issued on June 25, 2001;
- (d) Third Administrative Amendment 099-15049-00037, issued on January 14, 2002;
- (e) Fourth Administrative Amendment 099-16672-00037, issued on March 3, 2003; and
- (f) Fifth Administrative Amendment 099-18401-00037, issued on December 11, 2003.

The following conditions have not been included in this permit renewal:

- (a) Condition D.1.1 PSD Minor Limit

D.1.1 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

The total usage of volatile organic compounds (VOC) from the seven (7) gel coat booths (ID Nos. GC1 through GC7) and the four (4) resin/chopper booths (ID Nos. C1 through C4) shall be limited to no more than 244.48 tons of VOC per twelve (12) consecutive month period. The emission factor representing the percent by weight of gel coat usage that is emitted and the emission factor representing the percent by weight of resin usage that is emitted, shall each be based on the styrene monomer content of the gel coat and resin, respectively, and shall be calculated using the reference approved by IDEM, OAM: "CFA Emission Models for the Reinforced Plastics Industries," Composites Fabricators Association, February 28, 1998.

This usage limit is required to limit the source wide potential to emit of VOC to less than 250 tons per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

Reason not incorporated:

Condition D.1.1 was removed because the unrestricted VOC emission from the source is now less than 250 tons per year.

(b) Condition D.1.3 Particulate Matter (PM)

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

(a) The PM overspray from the seven (7) gel coat booths (ID Nos. GC1 through GC7) and the four (4) resin/chopper booths (ID Nos. C1 through C4) shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

- (b) Overspray from the seven (7) gel coat booths (ID Nos. GC1 through GC7) and the four (4) resin/chopper booths (ID Nos. C1 through C4) shall not be abnormally visibly detectable at the exhaust.
- (c) Overspray from the seven (7) gel coat booths (ID Nos. GC1 through GC7) and the four (4) resin/chopper booths (ID Nos. C1 through C4) shall not be abnormally accumulated at the rooftops or on the ground.

Reason not incorporated:

The 326 IAC 6-3 revisions that became effective on June 12, 2002 were approved into the State Implementation Plan on September 23, 2005. These rules replace the previous version of 326 IAC 6-3 (Process Operations) that had been part of the SIP; therefore, the requirements of the previous version of 326 IAC 6-3-2 are no longer applicable to this source. Condition D.1.3 has been revised to reflect the rule change.

Enforcement Issue

There are no enforcement actions pending.

Emission Calculations

See Appendix A of this document for detailed emission calculations (pages 1 through 5).

County Attainment Status

The source is located in Marshall County.

Pollutant	Status
PM2.5	Attainment
PM-10	Attainment
SO ₂	Attainment
NO ₂	Attainment
8-hour Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. Marshall 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 for the source section.
- (b) Marshall County has been classified as unclassifiable or attainment for PM2.5. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM 2.5 emissions. Therefore, until the U.S. EPA adopts specific provisions for PSD review for PM2.5 emissions, it has directed states to regulate PM10 emissions as a surrogate for PM2.5 emissions. See the State Rule Applicability for the source section.
- (c) Marshall 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 for the source section.
- (d) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 redesignating Delaware, Greene, Jackson, Vanderburgh, Vigo and Warrick Counties to attainment for the eight-hour ozone standard, redesignating Lake County to attainment for the sulfur dioxide standard, and revoking the one-hour ozone standard in Indiana.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Pollutant	tons/year
PM	164.12
PM-10	164.12
SO ₂	0.02
VOC	191.42
CO	2.49
NO _x	2.96

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

HAPs	tons/year
Styrene	138.60
Methyl Methacrylate	27.58
Total	188.34

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM-10 and VOC is 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 all other criteria pollutants are less than 100 tons per year.

- (c) 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/or 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.

Actual Emissions

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

Pollutant	Actual Emissions (tons/year)
PM	Not Reported
PM-10	Not Reported
SO ₂	Not Reported
VOC	23.00
CO	Not Reported
NO _x	Not Reported
HAPs	Not Reported

NOTE: 2003 VOC emissions recorded for Charleston Corporation and Bennington Marine, L.L.C. jointly as a source before splitting into two separate companies. Therefore, value does not represent current Bennington Marine, L.L.C. actual VOC emissions.

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.

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of this Part 70 permit renewal, and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/emission unit	Potential to Emit (tons/year)							
	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs	
							Single Worst Case	Combined Total
Fiberglass Operations	8.19	8.19	0.00	191.26	0.00	0.00	138.60	188.34
Insignificant Activities	0.22	0.22	0.02	0.16	2.49	2.96	0.00	0.00
Total PTE	8.41	8.41	0.02	191.42	2.49	2.96	138.60	188.34

- (a) This existing stationary source is not major for PSD because the emissions of each criteria pollutant are less than two hundred fifty (<250) tons per year, and it is not one of the twenty-eight (28) listed source categories.
- (b) **Fugitive Emissions**
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3, fugitive emissions are not counted toward the determination of PSD and Emission Offset applicability.

Federal Rule Applicability

The following federal rules are applicable to the source:

- (a) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to existing emission units that involve a pollutant-specific emission unit and meet the following criteria:
 - (1) has a potential to emit before controls equal to or greater than the major source threshold for the pollutant involved;
 - (2) is subject to an emission limitation or standard for that pollutant; and
 - (3) uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.

The following table is used to identify the applicability of each of the criteria, under 40 CFR 64.1, to each existing emission unit and specified pollutant subject to CAM:

Emission Unit / Pollutant	Control Device Used	Emission Limitation (Y/N)	Uncontrolled PTE (tons/year)	Controlled PTE (tons/year)	Major Source Threshold (tons/year)	CAM Applicable (Y/N)	Large Unit (Y/N)
GC5 - PM10	Dry Filters	Y	< 100	< 10	100	N	N
GC6 - PM10	Dry Filters	Y	< 100		100	N	N
GC7 - PM10	Dry Filters	Y	< 100		100	N	N
C4 - PM10	Dry Filters	Y	< 100		100	N	N
GC5 - VOC	None	N	< 100	< 250	100	N	N
GC6 - VOC	None	N	< 100		100	N	N
GC7 - VOC	None	N	< 100		100	N	N
C4 - VOC	None	N	< 100		100	N	N

Each of the four (4) surface coating spray booths has uncontrolled potential to emit of VOC and PM/PM₁₀ of less than 100 tons per year. The surface coating booths have no control device to control the emissions of VOC. Therefore they are not subject to the requirements of 40 CFR Part 64, Compliance Assurance Monitoring.

The potential to emit HAP is greater than 10 tons each and 25 tons combined per year for the four (4) surface coating booths but they are not subject to the requirements of 40 CFR 64, because they are subject to the NESHAP standards of 40 CFR 63 (Subpart VVVV and Subpart WWWW). Pursuant to 40 CFR 64.2(b)(1)(i), emission limitations or standards proposed by U.S. EPA after November 15, 1990 pursuant to Section 111 or 112 of the Clean Air Act are exempt from the requirements of 40 CFR 64.

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

- (c) The New Source Performance Standard, 326 IAC 12 (40 CFR 60.110, Subpart Kb) is not included in the permit for the resin storage tank because the storage capacity of the tank (7000 gallons equivalent to 26.53 cubic meters) is less than 75 cubic meters.
- (d) All operations at this source are related to fiberglass boat production. Pursuant to § 63.5787(b), sources subject to 40 CFR Part 63, Subpart VVVV, and manufacturing reinforced plastic composites only for boats are exempt from 40 CFR 63, Subpart WWWW. Therefore, the requirements of 40 CFR Part 63, Subpart WWWW are not included in the permit for this source.
- (e) This source is not subject to the requirements of National Emission Standards for Hazardous Air Pollutants, 40 CFR 63.4480, Subpart PPPP because the coating operations do not apply surface coating to plastic parts and products, as defined in 40 CFR 63.4481(a). Therefore, the requirements of National Emission Standards for Hazardous Air Pollutants for Plastic Parts and Products, (40 CFR 63.4480, Subpart PPPP) are not included in the permit.
- (f) This source performs fiberglass boat production and is a major source of HAP. Therefore, this source is subject to the requirements of National Emissions Standards for Hazardous Air Pollutants: Boat Manufacturing, 40 CFR 63, Subpart VVVV.

Under NESHAP, Subpart VVVV, the three (3) gelcoat booths and one (1) resin chop area, are considered an existing affected source because the construction of the source commenced prior to August 2, 2001 and the source is not reconstructed.

Pursuant to 40 CFR 63.5695, the Permittee shall comply with the requirements of 40 CFR 63, Subpart VVVV by August 23, 2007.

Non applicable portions of the NESHAP will not be included in the permit. This source is subject to the following portions of Subpart VVVV.

- (a) 40 CFR 63.5683
- (b) 40 CFR 63.5686
- (c) 40 CFR 63.5689
- (d) 40 CFR 63.5692 (a) and (b)
- (e) 40 CFR 63.5695
- (f) 40 CFR 63.5698
- (g) 40 CFR 63.5701 (a) and (b)
- (h) 40 CFR 63.5704 (a) and (b)
- (i) 40 CFR 63.5707
- (j) 40 CFR 63.5710 (a), (b), (d) and (e)
- (k) 40 CFR 63.5713(a), (b), (c) and (d)
- (l) 40 CFR 63.5714(a), (b), (c) and (d)
- (m) 40 CFR 63.5734

- (n) 40 CFR 63.5737
- (o) 40 CFR 63.5758
- (p) 40 CFR 63.5761
- (q) 40 CFR 63.5764
- (r) 40 CFR 63.5767
- (s) 40 CFR 63.5770
- (t) 40 CFR 63.5773
- (u) 40 CFR 63.5776
- (v) 40 CFR 63.5779

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.

State Rule Applicability – Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

On November 14, 2003, Bennington Marine, L.L.C. purchased the boat business portion of Charleston Corporation and Bennington Marine Corporation. The gel coat and resin chop booths at this source were originally constructed in 1992, after the 326 IAC 2-2 applicability date of August 7, 1977. However, the source is not one of 28 source categories and has unrestricted PTE of VOC of less than 250 tons per year. The emission factors were based on the reference approved by IDEM, OAQ: “CFA Emission Models for the Reinforced Plastics Industries,” Composites Fabricators Association, July 2001. The source also has unrestricted PTE of PM/PM₁₀ of less than 250 tons per year. Therefore, the requirements of the 326 IAC 2-2 (Prevention of Significant Deterioration) do not apply to this source.

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

The operation of the fiberglass and plastic manufacturing plant, built in 1992, will emit greater than ten (10) tons per year of a single HAP and 25 tons per year of a combination of HAPs. However, 326 IAC 2-4.1 does not apply because 40 CFR 63, Subpart VVVV is applicable to the source.

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 annually if the potential to emit of VOC or PM₁₀ is greater than 250 tons per year, otherwise the emission statement shall be submitted triennially. For this source, the source wide emissions of VOC and PM₁₀ are each less than 250 tons per year. Therefore, in accordance with the compliance schedule in 326 IAC 2-6-3, an emission statement shall be submitted triennially by July 1 beginning in 2004 and every 3 years thereafter. 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 this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

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

326 IAC 20-48 is applicable to boat manufacturing facilities that are major sources of HAPs. Pursuant to 326 IAC 20-48-2, in addition to alternative organic HAP content requirements for open molding resin operations contained in Table 2 to Subpart VVVV, 40 CFR 63, the alternative HAP content requirements for gel coat operations are as follows:

Gel Coat Application		
Operation	Application Method	The weighted average HAP content shall not exceed
Pigmented gel coat	Atomized (spray)	33%
Clear gel coat operations	Atomized (spray)	48%
Tooling Gel Coat	Atomized (spray)	40%
Pigmented Gel Coat	Nonatomized (nonspray)	40%
Clear Gel Coat	Nonatomized (nonspray)	55%
Tooling Gel Coat	Nonatomized (nonspray)	54%

Pursuant to 326 IAC 20-48-3, the Permittee shall operate the three (3) gel coat booths and one (1) resin chop area in accordance with the following work practice standards:

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

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

Pursuant to 326 IAC 20-48-4 (Operator Training), the permit shall comply with following operator training requirements:

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

326 IAC 20-56

326 IAC 20-56 is applicable to reinforced plastic composites production facilities that are major sources of HAPs. All operations in this source are related to fiberglass boat operation. Pursuant to Section 63.5787(b), sources subject to 40 CFR 63, Subpart VVVV and manufacturing reinforced plastic composites only for boats are exempt from 40 CFR 63, Subpart WWWW. Since 326 IAC 20-56 incorporates 40 CFR 63, Subpart WWWW by reference, the source is exempt from 326 IAC 20-56. Therefore, the requirements of 326 IAC 20-56 are not included in the permit.

State Rule Applicability – Individual Facilities

326 IAC 6-3-2 (Particulate Emission Limitations)

- (a) Pursuant to 326 IAC 6-3-2(d), particulate from the three (3) gel coat booths (GC5, GC6 and GC7) and one (1) resin chop booth (C4) shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

- (b) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the two (2) grinding booths (G5 and G6) shall not exceed 3.5 pounds per hour when operating at a total process weight rate of 1000 pounds per hour.

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

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

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

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

Pursuant to OP 099-6954-00037, issued on January 14, 1999, the Best Available Control Technology (BACT) for the three (3) gel coat booths (GC5, GC6 and GC7) and one (1) resin/chopper booths (C4) that were constructed in 1992 shall be no VOC control with the following work practices:

- (a) use of spray guns with a transfer efficiency of 77%; and
(b) use of resin with a styrene content less than or equal to 38% by weight.

326 IAC 12 (New Source Performance Standards)

The New Source Performance Standard, 326 IAC 12 (40 CFR 60.110, Subpart Kb) is not included in the permit for the resin storage tank because the storage capacity of the tank (7000 gallons equivalent to 26.53 cubic meters) is less than 75 cubic meters.

Compliance Requirements

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

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

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

1. The three (3) gel coat booths (GC5, GC6 and GC7) and one (1) resin chop booth (C4) 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 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 to ensure compliance with 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) and 326 IAC 2-7 (Part 70).

Recommendation

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

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

An administratively complete Part 70 permit renewal application for the purposes of this review was received on March 3, 2003. Additional information was received on November 12, 2003.

Conclusion

The operation of this stationary plastic and fiberglass boat manufacturing facility shall be subject to the conditions of this Part 70 permit **T099-18459-00097**.

Appendix A: Emission Calculations Summary of Emissions Calculations

Company Name: Bennington Marine, L.L.C.
Address City IN Zip: 1849B Dogwood Road, Bremen, Indiana 46506
Title V: T099-18459-00097
Plt ID: 099-00097
Reviewer: GS/EVP

Uncontrolled Potential Emissions (tons/year)			
Emissions Generating Activity			
Pollutant	Fiberglass Processes Emissions	Insignificant Activities (Natural Gas Combustion)	TOTAL
PM	163.90	0.22	164.12
PM ₁₀	163.90	0.22	164.12
SO ₂	0.00	0.02	0.02
NO _x	0.00	2.96	2.96
VOC	191.26	0.16	191.42
CO	0.00	2.49	2.49
total HAPs	188.34	0.00	188.34
worst case single HAP	138.60	0.00	138.60
Total emissions based on rated capacity at 8,760 hours/year.			
Controlled Potential Emissions (tons/year)			
Emissions Generating Activity			
Pollutant	Fiberglass Processes Emissions	Natural Gas Combustion	TOTAL
PM	8.19	0.22	8.41
PM ₁₀	8.19	0.22	8.41
SO ₂	0.00	0.02	0.02
NO _x	0.00	2.96	2.96
VOC	191.26	0.16	191.42
CO	0.00	2.49	2.49
total HAPs	188.34	0.00	188.34
worst case single HAP	138.60	0.00	138.60
Total emissions based on rated capacity at 8,760 hours/year, after control.			

**Appendix A: Emissions Calculations
VOC and Particulate
From Gel and Resin Coating Operations
Reinforced Plastics and Composites Fiberglass Processes**

Company Name: Bennington Marine, L.L.C.
Address City IN Zip: 1849B Dogwood Road, Bremen, Indiana 46506
Permit Number: T099-18459-00097
Pit ID: 099-00097
Reviewer: GS/EVP

GelCoat											
Material	Density (Lb/Gal)	Weight % Styrene Monomer or VOC	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Ton Processed per hour	CFA Unified Emission Factor (lb/ton)	Potential VOC pounds per hour	Potential Pounds of VOC per day	Potential VOC tons per year	Particulate Potential (ton/yr)	Transfer Efficiency
Hydroshield Lite Off White Gel LHM-2845	11.50	30.00%	20.870	0.50	0.05998	315.00	18.89	151.14	82.75	84.59	77%

Resin											
Material	Density (Lb/Gal)	Weight % Styrene Monomer or VOC	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Ton Processed per hour	CFA Unified Emission Factor (lb/ton)	Potential VOC pounds per hour	Potential Pounds of VOC per day	Potential VOC tons per year	Particulate Potential (ton/yr)	Transfer Efficiency
Aropol Resin 63320-T32	9.00	35.00%	121.333	0.50	0.27300	77.00	21.02	168.17	92.07	77.72	95%

Tooling GelCoat											
Material	Density (Lb/Gal)	Weight % Styrene Monomer or VOC	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Ton Processed per hour	CFA Unified Emission Factor (lb/ton)	Potential VOC pounds per hour	Potential Pounds of VOC per day	Potential VOC tons per year	Particulate Potential (ton/yr)	Transfer Efficiency
Tangerine Tooling	9.53	45.12%	16.822	0.006	0.00048	543.0	0.26	2.09	1.14	0.53	77%

Tooling Resin											
Material	Density (Lb/Gal)	Weight % Styrene Monomer or VOC	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Ton Processed per hour	CFA Unified Emission Factor (lb/ton)	Potential VOC pounds per hour	Potential Pounds of VOC per day	Potential VOC tons per year	Particulate Potential (ton/yr)	Transfer Efficiency
Hydrex Skin Tooling	8.75	35.50%	36.800	0.006	0.00097	102.0	0.10	0.79	0.43	0.27	95%
Polylite Tooling Resin	8.58	47.50%	132.051	0.006	0.00340	311.0	1.06	8.46	4.63	0.78	95%

Catalyst											
Material	Density (Lb/Gal)	Weight % Styrene Monomer or VOC	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Ton Processed per hour	CFA Unified Emission Factor (lb/ton)	Potential VOC pounds per hour	Potential Pounds of VOC per day	Potential VOC tons per year	Particulate Potential (ton/yr)	Transfer Efficiency
Norox MEKP-9 Red	9.16	7.10%	2.041	0.50	0.00467	N/A	0.66	5.31	2.91	0.00	100%

Miscellaneous											
Material	Density (Lb/Gal)	Weight % Styrene Monomer or VOC	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Ton Processed per hour	CFA Unified Emission Factor (lb/ton)	Potential VOC pounds per hour	Potential Pounds of VOC per day	Potential VOC tons per year	Particulate Potential (ton/yr)	Transfer Efficiency
Body Filler - XL Microcel Light	9.58	0.07%	0.0866	0.500	0.00021	N/A	0.00	0.00	0.00	0.00	100%
Extracut Rub Compound Perfect-It III	9.16	60.00%	0.5218	0.500	0.00119	N/A	1.43	11.47	6.28	0.00	100%
W-1 Wax	8.75	33.00%	0.1520	0.500	0.00033	N/A	0.22	1.76	0.96	0.00	100%
White Spray Paint	9.00	41.22%	0.0100	0.500	0.00002	N/A	0.02	0.15	0.08	0.00	100%

Total Potential Emissions							43.67	349.33	191.26	163.90	
Control Efficiency									0.00%	95.00%	
Controlled Total Potential Emissions									191.26	8.19	

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hrs/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) * (8760 hrs/yr) * (1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used

NOTES

Emission factors are based on Composite Fabricators Association (CFA) Unified Emission Factor
Coating operations are mutually exclusives, therefore worst case emissions are to determine the total potential emission

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

Company Name: Bennington Marine, L.L.C.
Address City IN Zip: 1849B Dogwood Road, Bremen, Indiana 46506
Permit Number: T099-18459-00097
Pit ID: 099-00097
Reviewer: GS/EVP

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

6.76

59.2

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.06	0.22	0.02	2.96	0.16	2.49

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

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

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

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

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

See next page for HAPs emissions calculations.

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

Company Name: Bennington Marine, L.L.C.
Address City IN Zip: 1849B Dogwood Road, Bremen, Indiana 46506
Permit Number: T099-18459-00097
Plt ID: 099-00097
Reviewer: GS/EVP

HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	6.214E-05	3.551E-05	2.219E-03	5.326E-02	1.006E-04

HAPs - Metals						
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03	Total
Potential Emission in tons/yr	1.480E-05	3.255E-05	4.143E-05	1.124E-05	6.214E-05	5.584E-02

Methodology is the same as previous page.

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

**Appendix A: Emission Calculations
HAP Emissions - Potential to Emit**

Company Name: Bennington Marine, L.L.C.
 Address City IN Zip: 1849B Dogwood Road, Bremen, Indiana 46506
 Permit Number: T099-18459-00097
 Pit ID: 099-00097
 Reviewer: GS/EVP

Potential To Emit																	
Material	Density (lb/gal)	Gal of Mat (gal/unit)	Maximum Production (unit/hr)	Weight % Styrene (Styrene Rate (lb/ton))	Weight % Methyl Methacrylate (MMA) (MMA Rate (lb/ton))	Weight % Dimethyl phthalate	Weight % Formaldehyde	Weight % Cobalt Compounds	Weight % Vinyl Acetate	Styrene Emissions (tons/yr)	Methyl Methacrylate Emissions (tons/yr)	Dimethyl phthalate Emissions (tons/yr)	Formaldehyde Emissions (tons/yr)	Cobalt Compounds Emissions (tons/yr)	Vinyl Acetate Emissions (tons/yr)	TOTAL HAPs Emissions (tons/yr)	
Gel Coat Spray Booth																	
Hydroshield Lite Off White Gel LHM-2845	11.50	20.870	0.50	23.00%	7.00%	0.00%	0.00%	0.00%	0.00%	53.77	27.58	0.00	0.00	0.00	0.00	81.36	
				204.70	105.00												
Resin Spray Booth																	
Aropol Resin 63320-T32	9.00	121.333	0.50	32.40%	0.00%	0.00%	0.00%	0.20%	0.00%	83.09	0.00	0.00	0.00	4.78	0.00	87.87	
				69.49													
Tooling GelCoat																	
Tangerine Tooling	9.53	16.822	0.006	38.97%	3.00%	0.00%	0.00%	0.00%	0.00%	0.88	0.13	0.00	0.00	0.00	0.00	1.01	
				418.00	45.00												
Tooling Resin																	
Hydrex Skin Tooling	8.75	36.800	0.006	34.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.49	0.00	0.00	0.00	0.00	0.00	0.49	
				74.00	0.00												
Polylite Tooling Resin	8.58	132.051	0.006	47.00%	2.00%	0.00%	0.00%	0.00%	0.50%	0.00	0.60	0.00	0.00	0.00	0.15		
				115.00	30.00												
Catalyst																	
Norox MEKP-9 Red	9.16	2.042	0.50	0.00%	0.00%	43.00%	0.00%	0.00%	0.00%	0.00	0.00	17.61	0.00	0.00	0.00	17.61	
Miscellaneous																	
Body Filler - XL Microcel Light	9.58	0.0866	0.50	20.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.36	0.00	0.00	0.00	0.00	0.00	0.00	
Extracut Rub Compound Perfect-It III	9.16	0.5218	0.50	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
W-1 Wax	8.75	0.1520	0.50	0.00%	0.00%	0.00%	0.50%	0.00%	0.00%	0.00	0.00	0.00	0.01	0.00	0.00	0.00	
White Spray Paint	9.00	0.0100	0.50	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Worst Case Single Emission										138.60	27.58	17.61	0.01	4.78	0.15		
Total Worst Potential Emissions																	188.34

Methodology:

For Styrene and Methyl Methacrylate (MMA):

HAPs emission rate (tons/yr) = density (lb/gal) * (gal/unit) * (units/hour) * Styrene (or MMA) Rate (lb/ton) * (8,760 hrs/yr) * (1 ton/2,000 lb)

Others:

HAPs emission rate (tons/yr) = density (lb/gal) * (gal/unit) * (units/hour) * weight % HAP * (8,760 hrs/yr) * (1 ton/2,000 lb)