



Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

May 17, 2004

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

TO: Interested Parties / Applicant

RE: Supreme Corporation / 039-18848-00103

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

Notice of Decision – Approval

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to 326 IAC 2, this approval was effective immediately upon submittal of the application.

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

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

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

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

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

Enclosures
FNPER-AM.dot 9/16/03



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

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May 17, 2004

Mr. Christy Miller
Supreme Corporation
P. O. Box 463
Fort Wayne, Indiana 46803

Re: 039-18848
Third Administrative Amendment to
Part 70 T039-6046-00103

Dear Mr. Miller:

Supreme Corporation was issued a Part 70 permit T039-6046-00103 on April 19, 2001 for a heavy truck and bus painting and parts manufacturing plant. A letter requesting a change in the permit was received on April 12, 2004. The source requested to change on page 36 of 54 Section D.2.4 (a) (2) the Composite Fabricators Association April 20, 1999 unified emission factors for open molding of composites reference to Composite Fabricators Association July 23, 2001 unified emission factors for open molding of composites.

The source requested to incorporate the latest CFA emission factors (UEF July 2001) into the allowable emission factor calculations with the request for first Administrative Amendment No. 039-15157-00103 issued on January 31, 2002. The source emissions were already recalculated using the latest emission factor (UEF CFA July 2001) with the issuance of AA039-15157-00103. This requested change will not result in emissions increase, nor result in new applicable requirements. Moreover, the Best Available Control Technology (BACT) determined for the source is not affected by the change either. Hence, pursuant to 326 IAC 2-7-11 the requested change qualifies for "revisions in descriptive information where the revision will not trigger a new applicable requirement or violate a permit term". Therefore, Section D.2.4 (a) (2) is hereby administratively amended as follows (changes are bolded and deletions are struck-through for emphasis):

- (2) The emission factors approved for use by IDEM, OAQ shall be taken from the following reference, which is included with this permit: "Unified Emission Factors for Open Molding of Composites", Composites Fabricators Associations, ~~April 20, 1999~~ **July 23, 2001**. Reciprocators M-2 and M-4 are the only units which qualify to use controlled spray emission factors. For HAP-emitting operations not addressed by this reference, emission factors shall be taken from U.S. EPA's AP-42 document. For the purposes of these emission calculations, HAP monomer in resins and gel coats that is not styrene or methyl methacrylate shall be considered as styrene on an equivalent weight basis.

(3)

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

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Gaurav Shil, at (973) 575-2555, ext. 3259 or dial (800) 451-6027, and ask for extension 3-6878.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments
GS/EVP

cc: File – Elkhart County
U.S. EPA, Region V
Elkhart County Health Department
Air Compliance Section Inspector Tony Pelath
Compliance Data Section
Administrative and Development
Technical Support and Modeling - Michelle Boner



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PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**Supreme Corporation
2572 East Kersher Road
Goshen, Indiana 46528**

(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.: T039-6046-00103	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: April 19, 2001 Expiration Date: April 19, 2006

First Administrative Amendment: 039-15157 Issuance Date: January 31, 2002
Second Administrative Amendment: 039-17499 Issuance Date: May 1, 2003

Third Administrative Amendment: 039-18848	Page Number Amended: 36
Issued by: Original signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date: May 17, 2004



D.2.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

D.2.3 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the PM from the facilities 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:

$$E = 4.10 P^{0.6}$$

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

D.2.4 Best Available Control Technology (BACT) [326 IAC 8-1-6]

BACT for FRP production units M-1, M-2, M-3, M-4, M-5, M-6, M-7, M-8, M-9, B-1, B-2(a), B-2(b) N-3(a), N-3(b) and Binks115 touch up areas, shall be the following:

- (a) The use of styrene-containing resins and gel coats shall be limited such that the potential to emit (PTE) VOC from the FRP units shall be less than 240 tons per twelve (12) consecutive month period. Compliance with this BACT limit shall be determined based upon the following criteria:
- (1) Monthly usage by weight, weight percent content of all monomers that are volatile organic HAP, method of application, and other emission reduction techniques for each gel coat and resin shall be recorded. VOC emissions shall be calculated by multiplying the usage of each gel coat and resin by the emission factor that is appropriate for the monomer content, method of application, and other emission reduction techniques for each gel coat and resin, and summing the emissions for all gel coats and resins. Emission factors shall be obtained from the reference approved by IDEM, OAQ.
- (2) The emission factors approved for use by IDEM, OAQ shall be taken from the following reference, which is included with this permit: "Unified Emission Factors for Open Molding of Composites", Composites Fabricators Associations, July 23, 2001. Reciprocators M-2 and M-4 are the only units which qualify to use controlled spray emission factors. For HAP-emitting operations not addressed by this reference, emission factors shall be taken from U.S. EPA's AP-42 document. For the purposes of these emission calculations, HAP monomer in resins and gel coats that is not styrene or methyl methacrylate shall be considered as styrene on an equivalent weight basis.
- (b) The HAP monomer content of resins and gel coats used shall be limited to the following or their equivalent on an emissions mass basis:

Type of Gel Coat or Resin	HAP Monomer Content, weight
Production ¹ Gel Coat	37
Tooling ² Gel Coat	45
Production Resin	35