



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant

DATE: June 3, 2008

RE: Godfrey Conveyor, Inc. / 039-19656-00267

FROM: Matthew Stuckey, Branch 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, Suite N 501E, 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

Godfrey Conveyor, Inc., dba Godfrey Marine
4500 Middlebury Street
Elkhart, Indiana 46516

(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.: T039-19656-00267	
Issued by: Original signed by	Issuance Date: June 4, 2008
Chrystal Wagner, Section Chief Permits Branch Office of Air Quality	Expiration Date: June 4, 2013

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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 fiberglass and aluminum boat manufacturing facility.

Source Address:	4500 Middlebury Street, Elkhart, Indiana 46516
Mailing Address:	4500 Middlebury Street, Elkhart, Indiana 46516
General Source Phone Number:	574-522-8381
SIC Code:	3732
County Location:	Elkhart
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Operating Permit Program Minor Source, under PSD Rules Major Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

- (a) One (1) fiberglass application area, identified as the General Laminations Department, consisting of the following components:
 - (1) Three (3) gel coat booths, identified as gel6-01, gel6-02, and gel6-03, each with a maximum capacity of 496 pounds of gel coat per hour, utilizing air-assisted airless spray guns and dry filters for particulate control, and exhausting to three (3) stacks, identified as EF6-1, EF6-12, and EF6-13;
 - (2) Thirteen (13) fiberglass chop stations, identified as chop6-01, chop6-02, chop6-03, chop6-04, chop6-05, chop6-06, chop6-07, chop6-10, chop6-11, chop6-12, chop6-13, chop6-14, and chop6-15, each with a maximum capacity of 525 pounds of resin per hour, utilizing flowcoating, all exhausting to nine (9) stacks, identified as EF6-4, EF6-5, EF6-6, EF6-7, EF6-8, EF6-9, EF6-14, EF6-15, and EF6-16; and
 - (3) One (1) bilge gelcoat process booth, identified as Bilge Coating, in the general laminating department, utilizing one (1) air assisted airless spray gun and dry filters for particulate control, with a maximum capacity of 21 units per hour, exhausting to one (1) stack, identified as EF6-9. This was formerly known as the bilge painting process.

Under 40 CFR 63, Subpart VVVV, all emission units in this section are considered existing units in an existing affected source.

- (b) One (1) grinding booth, located in Plant 6, with a maximum capacity of 543 pounds of flange material processed per hour, equipped with dry filters for particulate matter control, exhausting to the inside of the booth.

- (c) Four (4) woodworking machines, located in Plant 7, with a total maximum throughput of 729 pounds per hour, with one (1) baghouse collector for particulate matter control, exhausting to the atmosphere.
- (d) One (1) fiberglass application area used for the production of master boat molds, identified as the Mold Department, consisting of the following components:
 - (1) One (1) gel coat booth, identified as gel9-01, with a maximum capacity of 496 pounds of gel coat per hour, utilizing airless spray guns and dry filters for particulate control, exhausting to one (1) stack, identified as EF9-1; and
 - (2) One (1) fiberglass chop booth, identified as chop9-01, with a maximum capacity of 525 pounds of resin per hour, utilizing flowcoating, exhausting to one (1) stack, identified as EF9-2.

Under 40 CFR 63, Subpart VVVV, all emission units in this section are considered existing units in an existing affected source.

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) Degreasing operations that do not exceed 145 gallons per twelve (12) months, except if subject to 326 IAC 20-6 [326 IAC 8-3-2] [326 IAC 8-3-5].
- (b) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment:
 - (1) Eleven (11) TIG welding units and eleven (11) MIG welding units located in Plant 1;
 - (2) One (1) MIG welding station located in Plant 9; and
 - (3) Metal fabrication operations located in Plant 3 consisting of ten (10) TIG welding units and four (4) MIG welding units.
- (c) Water based adhesives that are less than or equal to 5% by volume of VOCs, excluding HAPS:
 - (1) One (1) vinyl floor roll-on station, located in Plant 1;
 - (2) One (1) carpeting roll-on station, located in Plant 1; and
 - (3) One (1) carpet adhesive roll-on station and one (1) vinyl adhesive roll-on station, located in Plant 2.

Under 40 CFR 63, Subpart VVVV, all emission units in this section are considered existing units in an existing affected source.

- (d) Activities or categories of activities with individual HAP emissions not previously identified; any emitting unit greater than one (1) pound per day but less than five (5) pounds per day or one (1) ton per year of a single HAP:
 - (1) Spot repair/touch-up paint of steel and/or aluminum frame members using hand

held spray cans located in Plant 2, Plant 5, and Plant 6;

- (2) Spot repair/touch-up paint of fiberglass boats using hand held spray cans located in Plant 6 in the general laminating department;
- (3) Spot repair/touch-up gel coat of fiberglass boats and/or parts, located in Plant 6 in the general laminating department, with air-atomized spray guns; and
- (4) Spot repair/touch-up gel coat of fiberglass boats and/or parts, located in Plant 9.

Under 40 CFR 63, Subpart VVVV, all emission units in this section are considered existing units in an existing affected source.

(e) Other activities or categories not otherwise identified:

Insignificant Thresholds:

Lead (Pb) = 0.6 ton/year or 3.29 lbs/day	Carbon Monoxide (CO) = 25 lbs/day
Sulfur Dioxides (SO ₂) = 5 lbs/hour or 25 lbs/day	Particulate Matter (PM) = 5 lbs/hour or 25 lbs/day
Nitrogen Oxides (NO _x) = 5 lbs/hour or 25 lbs/day	Volatile Organic Compounds (VOC) = 3 lbs/hour or 15 lbs/day

- (1) One (1) adhesive application operation of vinyl covers to seats, located in Plant 7, utilizing hand held spray cans;
- (2) One (1) surface preparation operation located in Plant 1, utilizing citrus based cleaner and glass cleaner;
- (3) One assembly operation located in Plant 2, utilizing one (1) portable glue gun, one (1) putty gun using polyester putty for caulking, hand held guns using urethane caulks and silicone sealants, and spray cans of adhesive;
- (4) One (1) glue station located in Plant 6 utilizing a reactive adhesive that is applied by one (1) metered hand applicator; and
- (5) One (1) surface coating application area, used to make patterns for master molds.

Under 40 CFR 63, Subpart VVVV, all emission units in this section are considered existing units in an existing affected source.

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, T039-19656-00267, 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 the "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 no later than April 15 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, and Northern Regional Office 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

Northern Regional Office phone: (574) 245-4870; fax: (574) 245-4877.

- (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 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 T039-19656-00267 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 Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
- (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

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

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

Request for renewal shall be submitted to:

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

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).

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.

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.

C.12 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.
- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

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

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

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

- (a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on May 15, 2000.
- (b) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.15 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; and/or
 - (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.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]

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

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

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

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

- (a) In accordance with the compliance schedule specified in 326 IAC 2-6-3(b)(1), starting in 2004 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.18 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.19 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.20 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 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) fiberglass application area, identified as the General Lamination Department, consisting of the following components:
 - (1) Three (3) gel coat booths, identified as gel6-01, gel6-02, and gel6-03, each with a maximum capacity of 496 pounds of gel coat per hour, utilizing air-assisted airless spray guns and dry filters for particulate control, and exhausting to three (3) stacks, identified as EF6-1, EF6-12, and EF6-13;
 - (2) Thirteen (13) fiberglass chop stations, identified as chop6-01, chop6-02, chop6-03, chop6-04, chop6-05, chop6-06, chop6-07, chop6-10, chop6-11, chop6-12, chop6-13, chop6-14, and chop6-15, each with a maximum capacity of 525 pounds of resin per hour, utilizing flowcoating, all exhausting to nine (9) stacks, identified as EF6-4, EF6-5, EF6-6, EF6-7, EF6-8, EF6-9, EF6-14, EF6-15, and EF6-16; and
 - (3) One (1) bilge gelcoat process booth, identified as Bilge Coating, utilizing one (1) air assisted airless spray gun and dry filters for particulate control, with a maximum capacity of 21 units per hour, exhausting to one (1) stack, identified as EF6-9. This was formerly known as the bilge painting process.
- (b) One (1) fiberglass application area used for the production of master boat molds, identified as the Mold Department, consisting of the following components:
 - (1) One (1) gel coat booth, identified as gel9-01, with a maximum capacity of 496 pounds of gel coat per hour, utilizing airless spray guns and dry filters for particulate control, exhausting to one (1) stack, identified as EF9-1; and
 - (2) One (1) fiberglass chop booth, identified as chop9-01, with a maximum capacity of 525 pounds of resin per hour, utilizing flowcoating, exhausting to one (1) stack, identified as EF9-2.

Under 40 CFR 63, Subpart VVVV, all emission units in this section are considered existing units in an existing affected source.

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

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

D.1.1 Prevention of Significant Deterioration (PSD Minor Limit) [326 IAC 2-2]

- (a) The use of resins and gel coats shall be limited such that the PTE of VOC from the fiberglass operations identified as the General Lamination Department (gel coat and chop booths) is limited to less than 220 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (b) The use of resins and gel coats shall be limited such that the PTE of VOC from the fiberglass operations identified as Bilge Coating is limited to less than fifteen (15) tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (c) The use of resins and gel coats shall be limited such that the PTE of VOC from the

fiberglass operations identified as Mold Department is limited to less than ten (10) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

- (d) The controlled potential to emit for PM₁₀ and PM from the source shall be limited to less than a total of 250 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
 - (1) To comply with this limit, the source shall maintain the use of dry particulate filters for each of the fiberglass gel coat operations. The filters shall have a minimum control efficiency of 95%, and shall be in use at all times the booths are in operation.
- (e) The source-wide potential to emit VOC, PM₁₀, and PM shall be limited to less than 250 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with these limits will limit sourcewide emissions of VOC and PM/PM₁₀ to less than 250 tons per year and will render 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

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

Pursuant to Part 70 Operating Permit No. T039-8962-00267, issued to the source on March 31, 2000, and the Significant Source Modification No. 039-12158-00267, the requirements of 326 IAC 8-1-6 are applicable to the fiberglass gel coat booths, identified as gel6-01 through gel6-03, and the thirteen (13) fiberglass chop stations, identified as chop6-01 through chop6-07 and chop6-10 through chop6-15, located in the General Lamination department. Pursuant to 326 IAC 8-1-6, Best Available Control Technology for the fiberglass application areas located in the General Lamination department, consisting of gel6-01 through gel6-03, chop6-01 through chop6-07, and chop6-10 through chop6-15 shall be:

- (a) Use of resins and gel coats shall be limited such that the potential to emit (PTE) of volatile organic compounds for the fiberglass application area located in the General Lamination department, consisting of gel6-01, gel6-02 and gel6-03 and chop6-01, chop6-02, chop6-03, chop6-04, chop6-05, chop6-06, chop6-07, chop6-10, chop6-11, chop6-12, chop6-13, chop6-14 and chop6-15 shall be less than 220 tons per twelve (12) consecutive month period.
- (b) The total monomer contents of all resins and gel coats used shall be limited to 35 percent (35%) by weight for resins, 37 percent (37%) by weight for gel coats or their equivalent on an emissions mass basis. Monomer contents shall be calculated on a neat basis, i.e., excluding any filler. Compliance with these monomer content limits shall be demonstrated on a monthly basis.

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

(Emissions from >35% resin or >37% gel coat) - (Emissions from 35% resin or 37% gel coat) ≤ (Emissions from 35% resin or 37% gel coat) - (Emissions from <35% resin, <37%

gel coat, and/or other emission reduction techniques).

Where: Emissions, lb or ton = M (mass of resin or gel coat used, lb or ton) * EF (Monomer emission factor for resin or gel coat used, %);

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

- (c) Flow coaters, a type of non-spray application technology of a design and specifications to be approved by IDEM, OAQ, shall be used at all times to apply unfilled and filled resins.
- (d) Optimized spray technology approved by IDEM shall be used at all times to apply gel coats and filled resins. Optimized spray techniques include, but are not limited to, the use of airless, air-assisted airless, high volume low pressure (HVLP), or other spray applicators demonstrated to the satisfaction of IDEM, OAQ, to be equivalent to the spray applicators listed above.

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

- (e) A one (1) quart, air atomized spray gun may be used as needed for touch up purposes only.
- (f) The listed work practices shall be followed:
 - (1) To the extent possible, a non-VOC, non-HAP solvent shall be used for cleanup.
 - (2) For solvents that are VOC:
 - (A) Cleanup solvent containers used to transport solvent from drums to work stations shall be closed containers having soft gasketed spring-loaded closures.
 - (B) Cleanup rags saturated with solvent shall be stored, transported, and disposed of in containers that are closed tightly.
 - (C) The spray guns used shall be the type that can be cleaned without the need for spraying the solvent into the air.
 - (D) All solvent sprayed during cleanup or resin changes shall be directed into containers. Such containers shall be closed when not in use. The waste solvent shall be handled in such a manner that evaporation is minimized, and managed in accordance with applicable solid or hazardous waste requirements.
 - (E) Storage containers shall be kept covered when not in use.

D.1.3 Emission Standards for Hazardous Air Pollutants for Boat Manufacturing [326 IAC 20-48]

- (a) Pursuant to 326 IAC 20-48-2 (Alternative Organic HAP Content Requirements for Open Molding Gel Coat Operations), in addition to the 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		
For this operation	and this application method	You must not exceed this weighted-average percent organic HAP content (weight percent) requirement
Pigmented gel coat operations	Atomized (spray)	33 percent
Clear gel coat operations	Atomized (spray)	48 percent
Tooling gel coat operations	Atomized (spray)	40 percent
Pigmented gel coat operations	Nonatomized (nonspray)	40 percent
Clear gel coat operations	Nonatomized (nonspray)	55 percent
Tooling gel coat operations	Nonatomized (nonspray)	54 percent

- (b) Pursuant to 326 IAC 20-48-3 (Work Practice Standards), in addition to 40 CFR 63.5731 and 40 CFR 63.5734(b), the following work practice standards are required:
- (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 (HAPs). However, recycled cleaning solvents that contain less than or equal to five percent (5%) HAP by weight are considered to contain no HAP for the purposes of this subdivision. For removing cured resin or gel coat from application equipment, no organic HAP limit applies.
 - (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 HAPs.
 - (B) All production and tooling gel coats that contain HAPs.
 - (C) Waste resins and gel coats that contain HAPs.
 - (D) Cleaning materials, including waste cleaning materials.
 - (E) Other materials that contain HAPs.
- 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), each owner or operator shall train all new and existing personnel, including contract personnel, who are involved in resin and gel coat spraying and applications that could result in excess emissions if performed

improperly according to the following schedule:

- (1) All personnel hired shall be trained within fifteen (15) days of hiring.
- (2) To ensure training goals listed in subsection (b) are maintained, all personnel shall be given refresher training annually.
- (3) Personnel who have been trained by another owner or operator subject to this rule are exempt from subdivision (1) if written documentation that the employee's training is current is provided to the new employer.

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.

The owner or operator shall maintain the following training records on site and available for inspection and review:

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

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

D.1.4 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]

Particulate from the reinforced plastics composites fabricating manufacturing processes shall be controlled by a dry particulate filter and the Permittee shall operate the control device in accordance with manufacturer's specifications.

D.1.5 Preventive Maintenance Plan [326 IAC 1-6-3]

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

Compliance Determination Requirements

D.1.6 Volatile Organic Compounds [326 IAC 8-1-6]

Compliance with Condition D.1.1 and D.1.2 shall be determined based upon the following criteria:

- (a) Compliance with the VOC content and input limitations contained in Conditions D.1.1 and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets or MSDS. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.
- (b) Monthly usage by weight, weight percent content of all monomers that are VOCs, method of application, and other emission reduction techniques for each gel coat and resin shall be recorded. Volatile organic HAP emissions shall be calculated by multiplying the usage

of each gel coat and resin by the emission factor that is appropriate for the content of each monomer, 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.

- (c) Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA-approved form, emission factors shall be taken from the following reference approved by IDEM, OAQ: "Unified Emission Factors for Open Molding of Composites, July 23, 2001. The emission factors used for monomers that is styrene shall not exceed 32.3% styrene emitted per weight of gel coat applied and 17.7% styrene emitted per weight of resin applied. For the purposes of these emission calculations, monomer in resins and gel coats that is not styrene or methylmethacrylate shall be considered as styrene on an equivalent weight basis.

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

D.1.7 Visible Emissions Notations [40 CFR 64]

- (a) Daily inspections shall be performed to verify the placement, integrity, and particle loading of the filters for all fiberglass gel coat and bilge coating operations. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the stacks identified as EF6-1, EF6-9, EF6-12, EF6-13, and EF9-1 while the associated 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 particulate emissions from the stacks identified as EF6-1, EF6-9, EF6-12, EF6-13, and EF9-1 and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

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

D.1.8 Record Keeping Requirement

- (a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC, PM₁₀, and PM emission limits established in Conditions D.1.1 and D.1.2.
- (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The cleanup solvent usage for each month;
 - (4) The total VOC usage for each month;

- (5) The weight of VOC, PM₁₀, and PM emitted for each compliance period; and
 - (6) The control efficiency of the dry filters used to control particulate emissions from the gel coat and bilge coating operations.
- (b) To document compliance with Condition D.1.6, the Permittee shall maintain a log of the weekly overspray observations and daily and monthly inspections. The Permittee shall include in its log when an observation or inspection is not performed and the reason for the lack of observation or inspection (i.e., the process did not operate that day).
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements of this permit.

D.1.9 Reporting Requirement

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

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) grinding booth, located in Plant 6, with a maximum capacity of 543 pounds of flange material processed per hour, equipped with dry filters for particulate matter control, exhausting to the inside of the booth.
- (b) Four (4) woodworking machines, located in Plant 7, with a total maximum throughput of 729 pounds per hour, with one (1) baghouse collector for particulate matter control, exhausting to the atmosphere.

(The information describing the process contained in this emissions unit 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 Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]

- (a) The allowable PM emission rate for the woodworking operations shall not exceed 2.09 pounds of PM per hour when operating at a process weight rate of 0.365 tons per hour, total. This limit is based on the following equation:

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:

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

Where E = rate of emissions in pounds per hour and
 P = process weight rate in tons per hour.

- (b) The allowable PM emission rate for the flange grinding operations shall not exceed 1.71 pounds of PM per hour when operating at a process weight rate of 0.272 tons per hour, total. This limit is based on the following equation:

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:

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

Where E = rate of emissions in pounds per hour and
 P = process weight rate in tons per hour.

D.2.2 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the flange grinding booth, the four (4) woodworking machines, and their associated control equipment.

Compliance Determination Requirements

D.2.3 Particulate Control

- (a) In order to comply with Condition D.2.1(a), the baghouse for particulate control shall be in operation and control emissions from the woodworking operations at all times they are in operation.
 - (1) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or

replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

- (b) In order to comply with Condition D.2.1(b), the dry filters for particulate control shall be in use at all times the flange grinding operations are in operation.

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

D.2.4 Visible Emissions Notations [40 CFR 64]

- (a) For the woodworking operations, the following visible emission notations are required:
- (1) Daily visible emission notations of the woodworking operations' baghouse vent shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
 - (2) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
 - (3) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
 - (4) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
 - (5) If abnormal emissions are observed, the Permittee shall take reasonable steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Excursions or Exceedances shall be considered a deviation from this permit.
- (b) For the flange grinding operations, the following visible emission notations are required:
- (1) Daily inspections shall be performed to verify the placement, integrity, and particle loading of the filters for the flange grinding operations. 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.

D.2.5 Broken or Failed Bag Detection

- (a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emissions unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Bag failure can be indicated by a significant drop in the baghouse pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces, or triboflows.

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

D.2.6 Record Keeping Requirement

- (a) To document compliance with Condition D.2.4(a), the Permittee shall maintain daily records of the visible emission notations of the woodworking operations baghouse vent. The Permittee shall include in its records when an observation is not performed and the reason for the lack of observation (i.e., the process did not operate that day).
- (b) To document compliance with Condition D.2.4(b), the Permittee shall maintain daily records of the visible emission notations of the flange grinding operations. The Permittee shall include in its records when an observation is not performed and the reason for the lack of observation (i.e., the process did not operate that day).
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements of this permit.

SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) Degreasing operations that do not exceed 145 gallons per twelve (12) months, except if subject to 326 IAC 20-6 [326 IAC 8-3-2].

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

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

D.3.1 Organic Solvent Degreasing Operations [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2, this source has the following applicable requirements:

The owner or operator of a cold cleaning facility shall:

- (1) equip the cleaner with a cover;
- (2) equip the cleaner with a facility for draining cleaned parts;
- (3) close the degreaser cover whenever parts are not being handled in the cleaner;
- (4) drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (5) provide a permanent, conspicuous label summarizing the operating requirements;
- (6) store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

SECTION E.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) fiberglass application area, identified as the General Lamination Department, consisting of the following components:
 - (1) Three (3) gel coat booths, identified as gel6-01, gel6-02, and gel6-03, each with a maximum capacity of 496 pounds of gel coat per hour, utilizing air-assisted airless spray guns and dry filters for particulate control, and exhausting to three (3) stacks, identified as EF6-1, EF6-12, and EF6-13;
 - (2) Thirteen (13) fiberglass chop stations, identified as chop6-01, chop6-02, chop6-03, chop6-04, chop6-05, chop6-06, chop6-07, chop6-10, chop6-11, chop6-12, chop6-13, chop6-14, and chop6-15, each with a maximum capacity of 525 pounds of resin per hour, utilizing flowcoating, all exhausting to nine (9) stacks, identified as EF6-4, EF6-5, EF6-6, EF6-7, EF6-8, EF6-9, EF6-14, EF6-15, and EF6-16; and
 - (3) One (1) bilge gelcoat process booth, identified as Bilge Coating, utilizing one (1) air assisted airless spray gun and dry filters for particulate control, with a maximum capacity of 21 units per hour, exhausting to one (1) stack, identified as EF6-9. This was formerly known as the bilge painting process.
- (b) One (1) fiberglass application area used for the production of master boat molds, identified as the Mold Department, consisting of the following components:
 - (1) One (1) gel coat booth, identified as gel9-01, with a maximum capacity of 496 pounds of gel coat per hour, utilizing airless spray guns and dry filters for particulate control, exhausting to one (1) stack, identified as EF9-1; and
 - (2) One (1) fiberglass chop booth, identified as chop9-01, with a maximum capacity of 525 pounds of resin per hour, utilizing flowcoating, exhausting to one (1) stack, identified as EF9-2.
- (c) Water based adhesives that are less than or equal to 5% by volume of VOCs, excluding HAPS:
 - (1) One (1) vinyl floor roll-on station, located in Plant 1;
 - (2) One (1) carpeting roll-on station, located in Plant 1; and
 - (3) One (1) carpet adhesive roll-on station and one (1) vinyl adhesive roll-on station, located in Plant 2.
- (d) Activities or categories of activities with individual HAP emissions not previously identified; any emitting unit greater than one (1) pound per day but less than five (5) pounds per day or one (1) ton per year of a single HAP:
 - (1) Spot repair/touch-up paint of steel and/or aluminum frame members using hand held spray cans located in Plant 2, Plant 5, and Plant 6;
 - (2) Spot repair/touch-up paint of fiberglass boats using hand held spray cans located in Plant 6 in the general laminating department;

(3)	Spot repair/touch-up gel coat of fiberglass boats and/or parts, located in Plant 6 in the general laminating department, with air-atomized spray guns; and
(4)	Spot repair/touch-up gel coat of fiberglass boats and/or parts, located in Plant 9.
(e)	Other activities or categories not otherwise identified: Insignificant Thresholds: Lead (Pb) = 0.6 ton/year or 3.29 lbs/day Carbon Monoxide (CO) = 25 lbs/day Sulfur Dioxides (SO ₂) = 5 lbs/hour or 25 lbs/day Particulate Matter (PM) = 5 lbs/hour or 25 lbs/day Nitrogen Oxides (NOX) = 5 lbs/hour or 25 lbs/day or Volatile Organic Compounds (VOC) = 3 lbs/hour 15 lbs/day
(1)	One (1) adhesive application operation of vinyl covers to seats, located in Plant 7, utilizing hand held spray cans;
(2)	One (1) surface preparation operation located in Plant 1, utilizing citrus based cleaner and glass cleaner;
(3)	One assembly operation located in Plant 2, utilizing one (1) portable glue gun, one (1) putty gun using polyester putty for caulking, hand held guns using urethane caulks and silicone sealants, and spray cans of adhesive;
(4)	One (1) glue station located in Plant 6 utilizing a reactive adhesive that is applied by one (1) metered hand applicator; and
(5)	One (1) surface coating application area, used to make patterns for master molds.

Under 40 CFR 63, Subpart VVVV, all emission units in this section are considered existing units in an existing affected source.

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

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

Pursuant to 40 CFR 63.5773, 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 8 of 40 CFR Part 63, Subpart VVVV in accordance with the schedule in 40 CFR 63, Subpart VVVV.

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

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

§ 63.5680 What is the purpose of this subpart?

(a) This subpart establishes national emission standards for hazardous air pollutants (HAP) for new and existing boat manufacturing facilities with resin and gel coat operations, carpet and fabric adhesive operations, or aluminum recreational boat surface coating operations. This subpart also establishes requirements to demonstrate initial and continuous compliance with the emission standards.

§ 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.

§ 63.5689 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.

§ 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.

(c) *Add-on control option.* Use an enclosure and add-on control device, and demonstrate that the resulting emissions meet the emission limit in §63.5698. Compliance with this option is based on control device performance testing and control device monitoring.

§ 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.

(c) *Add-on control option.* If you are using an add-on control device, you must demonstrate compliance by performing the steps in paragraphs (c)(1) through (5) of this section.

(1) Conduct a performance test of the control device as specified in §§63.5719 and 63.5722 to demonstrate initial compliance.

(2) Use the performance test results to determine control device parameters to monitor after the performance test as specified in §63.5725.

(3) Comply with the operating limits specified in §63.5715 and the control device and emission capture system monitoring requirements specified in §63.5725 to demonstrate continuous compliance.

(4) Keep the records specified in §63.5767.

(5) Submit to the Administrator the notifications and reports specified in §§63.5761 and 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.)

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

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.

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

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.

[66 FR 44232, Aug. 22, 2001; 66 FR 50504, Oct. 3, 2001]

§ 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.

§ 63.5715 What operating limits must I meet?

(a) For open molding operations on which you use a thermal oxidizer as an add-on control device, you must meet the operating limits specified in Table 4 to this subpart that apply to the emission capture system and thermal oxidizer. You must establish the operating limits during the performance test according to the procedures in §63.5725. You must meet the operating limits at all times after you establish them.

(b) If you use an add-on control device other than a thermal oxidizer, or wish to monitor an alternative parameter and comply with a different operating limit, you must apply to the Administrator for approval of alternative monitoring under §63.8(f).

§ 63.5716 When must I conduct a performance test?

(a) If your source is an existing source, you must complete the add-on control device performance test no later than the compliance date specified in §63.5695.

(b) If your source is a new source, you must complete the add-on control device performance test no later than 180 days after the compliance date specified in §63.5695.

(c) You must conduct a performance test every 5 years as part of renewing your 40 CFR part 70 or 71 operating permit.

§ 63.5719 How do I conduct a performance test?

(a) You must capture the emissions using a permanent enclosure (such as a spray booth or similar containment device) and direct the captured emissions to the add-on control device.

(b) You must measure emissions as specified in paragraph (b)(1) or (2) of this section.

(1) If the enclosure vented to the control device is a permanent total enclosure as defined in Method 204 of appendix M to 40 CFR part 51, then you may measure emissions only at the outlet of the control device.

(2) If the permanent enclosure vented to the control device is not a total enclosure, you must build a temporary total enclosure, as defined in Method 204 of appendix M to 40 CFR part 51, around the permanent enclosure. You must then simultaneously measure emissions from the control device outlet and the emissions from the temporary total enclosure outlet. You determine compliance from the combined emissions from the control device outlet and the temporary total enclosure outlet.

(c) You must conduct the control device performance test using the emission measurement methods specified in paragraphs (c)(1) through (4) of this section.

(1) Use either Method 1 or 1A of appendix A to 40 CFR part 60, as appropriate, to select the sampling sites.

(2) Use Method 2, 2A, 2C, 2D, 2F or 2G of appendix A to 40 CFR part 60, as appropriate, to measure gas volumetric flow rate.

(3) Use Method 18 of appendix A to 40 CFR part 60 to measure organic HAP emissions or use Method 25A of appendix A to 40 CFR part 60 to measure total gaseous organic emissions as a surrogate for total organic HAP emissions. If you use Method 25A, you must assume that all gaseous organic emissions measured as carbon are organic HAP emissions. If you use Method 18 and the number of organic HAP in the exhaust stream exceeds five, you must take into account the use of multiple chromatographic columns and analytical techniques to get an accurate measure of at least 90 percent of the total organic HAP mass emissions. Do not use Method 18 to measure organic HAP emissions from a combustion device; use instead Method 25A and assume that all gaseous organic mass emissions measured as carbon are organic HAP emissions.

(4) You may use American Society for Testing and Materials (ASTM) D6420–99 (available for purchase from at least one of the following addresses: 100 Barr Harbor Drive, West Conshohocken, PA 19428–2959; or University Microfilms International, 300 North Zeeb Road, Ann Arbor, MI 48106.) in lieu of Method 18 of 40 CFR part 60, appendix A, under the conditions specified in paragraphs (c)(4)(i) through (iii) of this section.

(i) If the target compound(s) is listed in Section 1.1 of ASTM D6420–99 and the target concentration is between 150 parts per billion by volume and 100 parts per million by volume.

(ii) If the target compound(s) is not listed in Section 1.1 of ASTM D6420–99, but is potentially detected by mass spectrometry, an additional system continuing calibration check after each run, as detailed in Section 10.5.3 of ASTM D6420–99, must be followed, met, documented, and submitted with the performance test report even if you do not use a moisture condenser or the compound is not considered soluble.

(iii) If a minimum of one sample/analysis cycle is completed at least every 15 minutes.

(d) The control device performance test must consist of three runs and each run must last at least 1 hour. The production conditions during the test runs must represent normal production conditions with respect to the types of parts being made and material application methods. The production conditions during the test must also represent maximum potential emissions with respect to the organic HAP content of the materials being applied and the material application rates.

(e) During the test, you must also monitor and record separately the amounts of production resin, tooling resin, pigmented gel coat, clear gel coat, and tooling gel coat applied inside the enclosure that is vented to the control device.

§ 63.5722 How do I use the performance test data to demonstrate initial compliance?

Demonstrate initial compliance with the open molding emission limit as described in paragraphs (a) through (c) of this section:

(a) Calculate the organic HAP limit you must achieve using equation 1 of §63.5698. For determining initial compliance, the organic HAP limit is based on the amount of material used during the performance test, in megagrams, rather than during the past 12 months. Calculate the limit using the megagrams of resin and gel coat applied inside the enclosure during the three runs of the performance test and equation 1 of §63.5698.

(b) Add the total measured emissions, in kilograms, from all three of the 1-hour runs of the performance test.

(c) If the total emissions from the three 1-hour runs of the performance test are less than the organic HAP limit calculated in paragraph (a) of this section, then you have demonstrated initial compliance with the emission limit in §63.5698 for those operations performed in the enclosure and controlled by the add-on control device.

§ 63.5725 What are the requirements for monitoring and demonstrating continuous compliance?

(a) You must establish control device parameters that indicate proper operation of the control device.

(b) You must install, operate, and maintain a continuous parameter monitoring system as specified in paragraphs (b)(1) through (8) of this section.

(1) The continuous parameter monitoring system must complete a minimum of one cycle of operation for each successive 15-minute period. You must have a minimum of four successive cycles of operation to have a valid hour of data.

(2) You must have valid data from at least 90 percent of the hours during which the process operated.

(3) You must determine the average of all recorded readings for each successive 3-hour period of the emission capture system and add-on control device operation.

(4) You must maintain the continuous parameter monitoring system at all times and have available necessary parts for routine repairs of the monitoring equipment.

(5) You must operate the continuous parameter monitoring system and collect emission capture system and add-on control device parameter data at all times that a controlled open molding operation is being performed, except during monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, if applicable, calibration checks and required zero and span adjustments).

(6) You must not use emission capture system or add-on control device parameter data recorded during monitoring malfunctions, associated repairs, out-of-control periods, or required quality assurance or control activities when calculating data averages. You must use all the data collected during all other periods in calculating the data averages for determining compliance with the emission capture system and add-on control device operating limits.

(7) You must record the results of each inspection, calibration, and validation check.

(8) Any period for which the monitoring system is out-of-control, as defined in §63.7(d)(7), or malfunctioning, and data are not available for required calculations is a deviation from the monitoring requirements. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the continuous parameter monitoring system to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

(c) *Enclosure bypass line.* You must meet the requirements of paragraphs (c)(1) and (2) of this section for each emission capture system enclosure that contains bypass lines that could divert emissions away from the add-on control device to the atmosphere.

(1) You must monitor or secure the valve or closure mechanism controlling the bypass line in a nondiverting position in such a way that the valve or closure mechanism cannot be opened without creating a record that the valve was opened. The method used to monitor or secure the valve or closure mechanism must meet one of the requirements specified in paragraphs (c)(1)(i) through (iv) of this section.

(i) *Flow control position indicator.* Install, calibrate, maintain, and operate according to the manufacturer's specifications a flow control position indicator that takes a reading at least once every 15 minutes and provides a record indicating whether the emissions are directed to the add-on control device or diverted from the add-on control device. The time of occurrence and flow control position must be recorded, as well as every time the flow direction is changed. The flow control position indicator must be installed at the entrance to any bypass line that could divert the emissions away from the add-on control device to the atmosphere.

(ii) *Car-seal or lock-and-key valve closures.* Secure any bypass line valve in the closed position with a car-seal or a lock-and-key type configuration. You must visually inspect the seal or closure mechanism at least once every month to ensure that the valve is maintained in the closed position, and the emissions are not diverted away from the add-on control device to the atmosphere.

(iii) *Valve closure continuous monitoring.* Ensure that any bypass line valve is in the closed (non-diverting) position through monitoring of valve position at least once every 15 minutes. You must inspect the monitoring system at least once every month to verify that the monitor will indicate valve position.

(iv) *Automatic shutdown system.* Use an automatic shutdown system in which the open molding operation is stopped when flow is diverted by the bypass line away from the add-on control device to the atmosphere when the open molding operation is running. You must inspect the automatic shutdown system at least once every month to verify that it will detect diversions of flow and shut down the open molding operation.

(2) If any bypass line is opened, you must include a description of why the bypass line was opened and the length of time it remained open in the semiannual compliance reports required in §63.5764(d).

(d) *Thermal oxidizers.* If you are using a thermal oxidizer or incinerator as an add-on control device, you must comply with the requirements in paragraphs (d)(1) through (6) of this section.

(1) You must install a combustion temperature monitoring device in the firebox of the thermal oxidizer or incinerator, or in the duct immediately downstream of the firebox before any substantial heat exchange occurs. You must meet the requirements in paragraphs (b) and (d)(1)(i) through (vii) of this section for each temperature monitoring device.

(i) Locate the temperature sensor in a position that provides a representative temperature.

- (ii) Use a temperature sensor with a minimum tolerance of 2.2 °C or 0.75 percent of the temperature value, whichever is larger.
 - (iii) Shield the temperature sensor system from electromagnetic interference and chemical contaminants.
 - (iv) If a chart recorder is used, it must have a sensitivity in the minor division of at least 10 °C.
 - (v) Perform an electronic calibration at least semiannually according to the procedures in the manufacturer's owners manual. Following the electronic calibration, you must conduct a temperature sensor validation check in which a second or redundant temperature sensor placed nearby the process temperature sensor must yield a reading within 16.7 °C of the process temperature sensor's reading.
 - (vi) Conduct calibration and validation checks any time the sensor exceeds the manufacturer's specified maximum operating temperature range or install a new temperature sensor.
 - (vii) At least monthly, inspect all components for integrity and all electrical connections for continuity, oxidation, and galvanic corrosion.
- (2) Before or during the performance test, you must conduct a performance evaluation of the combustion temperature monitoring system according to §63.8(e). Section 63.8(e) specifies the general requirements for continuous monitoring systems and requirements for notifications, the site-specific performance evaluation plan, conduct of the performance evaluation, and reporting of performance evaluation results.
- (3) During the performance test required by §63.5716, you must monitor and record the combustion temperature and determine the average combustion temperature for the three 1-hour test runs. This average temperature is the minimum operating limit for the thermal oxidizer.
- (4) Following the performance test, you must continuously monitor the combustion temperature and record the average combustion temperature no less frequently than every 15 minutes.
- (5) You must operate the incinerator or thermal oxidizer so that the average combustion temperature in any 3-hour period does not fall below the average combustion temperature recorded during the performance test.
- (6) If the average combustion temperature in any 3-hour period falls below the average combustion temperature recorded during the performance test, or if you fail to collect the minimum data specified in paragraph (d)(4) of this section, it is a deviation for the operating limit in §63.5715.
- (e) *Other control devices.* If you are using a control device other a thermal oxidizer, then you must comply with alternative monitoring requirements and operating limits approved by the Administrator under §63.8(f).
- (f) *Emission capture system.* For each enclosure in the emission capture system, you must comply with the requirements in paragraphs (f)(1) through (5) of this section.
- (1) You must install a device to measure and record either the flow rate or the static pressure in the duct from each enclosure to the add-on control device.
 - (2) You must install a device to measure and record the pressure drop across at least one opening in each enclosure.
 - (3) Each flow measurement device must meet the requirements in paragraphs (b) and (f)(3)(i) through (iv) of this section.

- (i) Locate the flow sensor in a position that provides a representative flow measurement in the duct between each enclosure in the emission capture system and the add-on control device.
 - (ii) Reduce swirling flow or abnormal velocity distributions due to upstream and downstream disturbances.
 - (iii) Conduct a flow sensor calibration check at least semiannually.
 - (iv) At least monthly, inspect all components for integrity, all electrical connections for continuity, and all mechanical connections for leakage.
- (4) For each pressure measurement device, you must comply with the requirements in paragraphs (a) and (f)(4)(i) through (vii) of this section.
- (i) Locate each pressure drop sensor in or as close to a position that provides a representative measurement of the pressure drop across each enclosure opening you are monitoring.
 - (ii) Locate each duct static pressure sensor in a position that provides a representative measurement of the static pressure in the duct between the enclosure and control device.
 - (iii) Minimize or eliminate pulsating pressure, vibration, and internal and external corrosion.
 - (iv) Check the pressure tap for plugging daily.
 - (v) Use an inclined manometer with a measurement sensitivity of 0.0004 millimeters mercury (mmHg) to check gauge calibration quarterly and transducer calibration monthly.
 - (vi) Conduct calibration checks any time the sensor exceeds the manufacturer's specified maximum operating pressure range or install a new pressure sensor.
 - (vii) At least monthly, inspect all components for integrity, all electrical connections for continuity, and all mechanical connections for leakage.
- (5) For each capture device that is not part of a permanent total enclosure as defined in Method 204 in appendix M to 40 CFR part 51, you must establish an operating limit for either the gas volumetric flow rate or duct static pressure, as specified in paragraphs (f)(5)(i) and (ii) of this section. You must also establish an operating limit for pressure drop across at least one opening in each enclosure according to paragraphs (f)(5)(iii) and (iv) of this section. The operating limits for a permanent total enclosure are specified in Table 4 to this subpart.
- (i) During the emission test required by §63.5716 and described in §63.5719, you must monitor and record either the gas volumetric flow rate or the duct static pressure for each separate enclosure in your emission capture system at least once every 15 minutes during each of the three test runs at a point in the duct between the enclosure and the add-on control device inlet.
 - (ii) Following the emission test, calculate and record the average gas volumetric flow rate or duct static pressure for the three test runs for each enclosure. This average gas volumetric flow rate or duct static pressure is the minimum operating limit for that specific enclosure.
 - (iii) During the emission test required by §63.5716 and described in §63.5719, you must monitor and record the pressure drop across the opening of each enclosure in your emission capture system at least once every 15 minutes during each of the three test runs.

(iv) Following the emission test, calculate and record the average pressure drop for the three test runs for each enclosure. This average pressure drop is the minimum operating limit for that specific enclosure.

§ 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.

§ 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.

§ 63.5740 What emission limit must I meet for carpet and fabric adhesive operations?

- (a) You must use carpet and fabric adhesives that contain no more than 5 percent organic HAP by weight.
- (b) To demonstrate compliance with the emission limit in paragraph (a) of this section, you must determine and record the organic HAP content of the carpet and fabric adhesives using the methods in §63.5758.

§ 63.5743 What standards must I meet for aluminum recreational boat surface coating operations?

- (a) For aluminum wipedown solvent operations and aluminum surface coating operations, you must comply with either the separate emission limits in paragraphs (a)(1) and (2) of this section, or the combined emission limit in paragraph (a)(3) of this section. Compliance with these limitations is based on a 12-month rolling average that is calculated at the end of every month.
- (1) You must limit emissions from aluminum wipedown solvents to no more than 0.33 kilograms of organic HAP per liter of total coating solids applied from aluminum primers, clear coats, and top coats combined. No limit applies when cleaning surfaces are receiving decals or adhesive graphics.
- (2) You must limit emissions from aluminum recreational boat surface coatings (including thinners, activators, primers, topcoats, and clear coats) to no more than 1.22 kilograms of organic HAP per liter of total coating solids applied from aluminum primers, clear coats, and top coats combined.
- (3) You must limit emissions from the combined aluminum surface coatings and aluminum wipedown solvents to no more than 1.55 kilograms of organic HAP per liter of total coating solids applied from aluminum primers, clear coats, and top coats combined.
- (b) You must comply with the work practice standard in paragraph (b)(1), (2), (3), or (4) of this section when cleaning aluminum coating spray guns with solvents containing more than 5 percent organic HAP by weight.
- (1) Clean spray guns in an enclosed device. Keep the device closed except when you place spray guns in or remove them from the device.
- (2) Disassemble the spray gun and manually clean the components in a vat. Keep the vat closed when you are not using it.
- (3) Clean spray guns by placing solvent in the pressure pot and forcing the solvent through the gun. Do not use atomizing air during this procedure. Direct the used cleaning solvent from the spray gun into a container that you keep closed when you are not using it.
- (4) An alternative gun cleaning process or technology approved by the Administrator according to the procedures in §63.6(g).

§ 63.5746 How do I demonstrate compliance with the emission limits for aluminum wipedown solvents and aluminum coatings?

To demonstrate compliance with the emission limits for aluminum wipedown solvents and aluminum coatings specified in §63.5743(a), you must meet the requirements of paragraphs (a) through (f) of this section.

(a) Determine and record the organic HAP content (kilograms of organic HAP per kilogram of material, or weight fraction) of each aluminum wipedown solvent and aluminum coating (including primers, topcoats, clear coats, thinners, and activators). Use the methods in §63.5758 to determine organic HAP content.

(b) Use the methods in §63.5758(b) to determine the solids content (liters of solids per liter of coating, or volume fraction) of each aluminum surface coating, including primers, topcoats, and clear coats. Keep records of the solids content.

(c) Use the methods in §63.5758(c) to determine the density of each aluminum surface coating and wipedown solvent.

(d) Compliance is based on a 12-month rolling average calculated at the end of every month. The first 12-month rolling-average period begins on the compliance date specified in §63.5695.

(e) At the end of the twelfth month after your compliance date and at the end of every subsequent month, use the procedures in §63.5749 to calculate the organic HAP from aluminum wipedown solvents per liter of coating solids, and use the procedures in §63.5752 to calculate the kilograms of organic HAP from aluminum coatings per liter of coating solids.

(f) Keep records of the calculations used to determine compliance.

(g) *Approval of alternative means of demonstrating compliance.* You may apply to the Administrator for permission to use an alternative means (such as an add-on control system) of limiting emissions from aluminum wipedown solvent and coating operations and demonstrating compliance with the emission limits in §63.5743(a).

(1) The application must include the information listed in paragraphs (g)(1)(i) through (iii) of this section.

(i) An engineering evaluation that compares the emissions using the alternative means to the emissions that would result from using the strategy specified in paragraphs (a) through (e) of this section. The engineering evaluation may include the results from an emission test that accurately measures the capture efficiency and control device efficiency achieved by the control system and the composition of the associated coatings so that the emissions comparison can be made.

(ii) A proposed monitoring protocol that includes operating parameter values to be monitored for compliance and an explanation of how the operating parameter values will be established through a performance test.

(iii) Details of appropriate recordkeeping and reporting procedures.

(2) The Administrator will approve the alternative means of limiting emissions if the Administrator determines that HAP emissions will be no greater than if the source uses the procedures described in paragraphs (a) through (e) of this section to demonstrate compliance.

(3) The Administrator's approval may specify operation, maintenance, and monitoring requirements to ensure that emissions from the regulated operations are no greater than those that would otherwise result from regulated operations in compliance with this subpart.

§ 63.5749 How do I calculate the organic HAP content of aluminum wipedown solvents?

(a) Use equation 1 of this section to calculate the weighted-average organic HAP content of aluminum wipedown solvents used in the past 12 months.

$$HAP_{WD} = \frac{\sum_{j=1}^n (Vol_j)(D_j)(W_j)}{\sum_{i=1}^m (Vol_i)(Solids_i)} \quad (Eq. 1)$$

Where:

HAP_{WD} = weighted-average organic HAP content of aluminum wipedown solvents, kilograms of HAP per liter of total coating solids from aluminum primers, top coats, and clear coats.

n = number of different wipedown solvents used in the past 12 months.

Vol_j = volume of aluminum wipedown solvent j used in the past 12 months, liters.

D_j = density of aluminum wipedown solvent j , kilograms per liter.

W_j = mass fraction of organic HAP in aluminum wipedown solvent j .

m = number of different aluminum surface coatings (primers, top coats, and clear coats) used in the past 12 months.

Vol_i = volume of aluminum primer, top coat, or clear coat i used in the past 12 months, liters.

$Solids_i$ = solids content aluminum primer, top coat, or clear coat i , liter solids per liter of coating.

(b) Compliance is based on a 12-month rolling average. If the weighted-average organic HAP content does not exceed 0.33 kilograms of organic HAP per liter of total coating solids, then you are in compliance with the emission limit specified in §63.5743(a)(1).

§ 63.5752 How do I calculate the organic HAP content of aluminum recreational boat surface coatings?

(a) Use equation 1 of this section to calculate the weighted-average HAP content for all aluminum surface coatings used in the past 12 months.

$$HAP_{SC} = \frac{\sum_{i=1}^m (Vol_i)(D_i)(W_i) + \sum_{k=1}^D (Vol_k)(D_k)(W_k)}{\sum_{i=1}^m (Vol_i)(Solids_i)} \quad (Eq. 1)$$

Where:

HAP_{SC} = weighted-average organic HAP content for all aluminum coating materials, kilograms of organic HAP per liter of coating solids.

m = number of different aluminum primers, top coats, and clear coats used in the past 12 months.

Vol_i = volume of aluminum primer, top coat, or clear coat i used in the past 12 months, liters.

D_i = density of coating i, kilograms per liter.

W_i = mass fraction of organic HAP in coating i, kilograms of organic HAP per kilogram of coating.

p = number of different thinners, activators, and other coating additives used in the past 12 months.

Vol_k = total volume of thinner, activator, or additive k used in the past 12 months, liters.

D_k = density of thinner, activator, or additive k, kilograms per liter.

W_k = mass fraction of organic HAP in thinner, activator, or additive k, kilograms of organic HAP per kilogram of thinner or activator.

$Solids_i$ = solids content of aluminum primer, top coat, or clear coat i, liter solids per liter of coating.

(b) Compliance is based on a 12-month rolling average. If the weighted-average organic HAP content does not exceed 1.22 kilograms of organic HAP per liter of coating solids, then you are in compliance with the emission limit specified in §63.5743(a)(2).

§ 63.5753 How do I calculate the combined organic HAP content of aluminum wipedown solvents and aluminum recreational boat surface coatings?

(a) Use equation 1 of this section to calculate the combined weighted-average organic HAP content of aluminum wipedown solvents and aluminum recreational boat surface coatings.

$$HAP_{Combined} = HAP_{WD} + HAP_{SC} \quad (Eq. 1)$$

Where:

HAP_{WD} = the weighted-average organic HAP content of aluminum wipedown solvents used in the past 12 months, calculated using equation 1 of §63.5749.

HAP_{SC} = the weighted average organic HAP content of aluminum recreational boat surface coatings used in the past 12 months, calculated using equation 1 of §63.5752.

(b) Compliance is based on a 12-month rolling average. If the combined organic HAP content does not exceed 1.55 kilograms of organic HAP per liter of total coating solids, then you are in compliance with the emission limit specified in §63.5743(a)(3).

§ 63.5755 How do I demonstrate compliance with the aluminum recreational boat surface coating spray gun cleaning work practice standards?

You must demonstrate compliance with the aluminum coating spray gun cleaning work practice standards by meeting the requirements of paragraph (a) or (b) of this section.

(a) Demonstrate that solvents used to clean the aluminum coating spray guns contain no more than 5 percent organic HAP by weight by determining organic HAP content with the methods in §63.5758. Keep records of the organic HAP content determination.

(b) For solvents containing more than 5 percent organic HAP by weight, comply with the requirements in paragraph (b)(1) or (b)(2), and paragraph (b)(3) of this section.

(1) If you are using an enclosed spray gun cleaner, visually inspect it at least once per month to ensure that covers are in place and the covers have no visible gaps when the cleaner is not in use, and that there are no leaks from hoses or fittings.

(2) If you are manually cleaning the gun or spraying solvent into a container that can be closed, visually inspect all solvent containers at least once per month to ensure that the containers have covers and the covers fit with no visible gaps.

(3) Keep records of the monthly inspections and any repairs that are made to the enclosed gun cleaners or the covers.

§ 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 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.

§ 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.

§ 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.
 - (iii) §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.

§ 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.

Table 1 to Subpart VVVV of Part 63—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.
2. An existing or new area source	Becomes a major source after August 22, 2001 ¹	1 year after becoming a major source or August 22, 2002, whichever is later.
3. A new source	Is a major source at startup ¹	Upon startup or August 22, 2001, whichever is later.

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 of Part 63—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 weighted-average organic HAP content (weight percent) requirement—
1. Production resin operations	Atomized (spray)	28 percent.
2. Production resin operations	Nonatomized (nonspray)	35 percent.
3. Pigmented gel coat operations	Any method	33 percent.
4. Clear gel coat operations	Any method	48 percent
5. Tooling resin operations	Atomized (spray)	30 percent.
6. Tooling resin operations	Nonatomized (nonspray)	39 percent.
7. Tooling gel coat operations	Any method	40 percent.

Table 3 to Subpart VVVV of Part 63—MACT Model Point Value Formulas for Open Molding Operations¹

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.

[66 FR 44232, Aug. 22, 2001; 66 FR 50504, Oct. 3, 2001]

Table 5 to Subpart VVVV of Part 63—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	64742–	0.1	Toluene.

distillate	47-8		
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 of Part 63—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).
2. Is a new source subject to this subpart	The notifications specified in §63.9(b) (3) to (5)	No later than the dates specified §63.9(b)(4) and (5).
3. Qualifies for a compliance extension as specified in §63.9(c)	A request for a compliance extension as specified in §63.9(c)	No later than the dates specified in §63.6(i).
4. Is complying with organic HAP content limits, application equipment requirements; or MACT	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

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

Table 8 to Subpart VVVV of Part 63—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	Yes.	

	Constructed, and Reconstructed Sources		
§63.5(c)		No	[Reserved]
§63.5(d)	Application for Approval of Construction/Reconstruction	Yes.	
§63.5(e)	Approval of Construction/Reconstruction	Yes.	
§63.5(f)	Approval of 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 that become major sources after the effective date of the rule.
§63.6(d)		No	[Reserved]
§63.6(e)(1)–(2)	Operation and Maintenance Requirements	No	Operating requirements for open molding operations with add-on controls are specified in §63.5725.
§63.6(e)(3)	Startup, Shut Down, and Malfunction Plans	Yes	Only sources with add-on controls must complete startup, shutdown, and malfunction plans.
§63.6(f)	Compliance with Nonopacity Emission Standards	Yes.	
§63.6(g)	Use of an Alternative 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 Alternative Monitoring Method	Yes.	
§63.8(f)(6)	Alternative to Relative Accuracy Test	Yes	Applies only to sources 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 Emissions/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.	

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Godfrey Conveyor, Inc., dba Godfrey Marine
Source Address: 4500 Middlebury Street, Elkhart, Indiana 46516
Mailing Address: 4500 Middlebury Street, Elkhart, Indiana 46516
Part 70 Permit No.: T039-19656-00267

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: Godfrey Conveyor, Inc., dba Godfrey Marine
Source Address: 4500 Middlebury Street, Elkhart, Indiana 46516
Mailing Address: 4500 Middlebury Street, Elkhart, Indiana 46516
Part 70 Permit No.: T039-19656-00267

This form consists of 2 pages

Page 1 of 2

- This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
 - The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16.

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

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

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

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

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

Part 70 Quarterly Report

Source Name: Godfrey Conveyor, Inc., dba Godfrey Marine
Source Address: 4500 Middlebury Street, Elkhart, Indiana 46516
Mailing Address: 4500 Middlebury Street, Elkhart, Indiana 46516
Part 70 Permit No.: T039-19656-00267
Facility: General Lamination Fiberglass Operations (Gel Coat and Chop Booths)
Parameter: VOC Usage
Limit: Less than 220 tons per twelve (12) consecutive months

QUARTER :

YEAR:

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

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.
Deviation has been reported on:

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

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

Source Name: Godfrey Conveyor, Inc., dba Godfrey Marine
Source Address: 4500 Middlebury Street, Elkhart, Indiana 46516
Mailing Address: 4500 Middlebury Street, Elkhart, Indiana 46516
Part 70 Permit No.: T039-19656-00267
Facility: Bilge Coating
Parameter: VOC Usage
Limit: Less than fifteen (15) tons per twelve (12) consecutive months

QUARTER :

YEAR:

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

No deviation occurred in this quarter.

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

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

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

Source Name: Godfrey Conveyor, Inc., dba Godfrey Marine
Source Address: 4500 Middlebury Street, Elkhart, Indiana 46516
Mailing Address: 4500 Middlebury Street, Elkhart, Indiana 46516
Part 70 Permit No.: T039-19656-00267
Facility: Mold Department Fiberglass Operations (Gel Coat and Chop Booths)
Parameter: VOC Usage
Limit: Less than ten (10) tons per twelve (12) consecutive months

QUARTER :

YEAR:

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

No deviation occurred in this quarter.

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

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

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE DATA SECTION
 PART 70 OPERATING PERMIT
 QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Godfrey Conveyor, Inc., dba Godfrey Marine
 Source Address: 4500 Middlebury Street, Elkhart, Indiana 46516
 Mailing Address: 4500 Middlebury Street, Elkhart, Indiana 46516
 Part 70 Permit No.: T039-19656-00267

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 for a Part 70 Operating Permit Renewal

Source Name: Godfrey Conveyor, Inc., dba Godfrey Marine
Source Location: 4500 Middlebury Street, Elkhart, Indiana 46516
County: Elkhart
SIC Code: 3732
Operation Permit No.: T039-19656-00267
Permit Reviewer: Stephanie Wilkerson

On April 4, 2008, the Office of Air Quality (OAQ) had a notice published in the Elkhart Truth in Elkhart, Indiana, stating that Godfrey Conveyor, Inc., dba Godfrey Marine, had applied for a Part 70 Operating Permit renewal for a stationary fiberglass and aluminum boat manufacturing facility. The notice also stated that OAQ proposed to issue a permit renewal for this operation and provided information on how the public could review the proposed permit renewal and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit renewal should be issued as proposed.

Comments from Mr. Michael Cira of Godfrey Conveyor, Inc. were received regarding the issuance of this permit renewal. The summary of the comments and corresponding responses is as follows (**bold** language has been added and ~~struck~~ language has been deleted):

Permit Section C

Comment 1:

The previous permit clearly delineated that testing was not required for the source. Please alter Condition C.8 to state the performance testing is required when stated specifically elsewhere in the permit.

Response 1:

The provision in Condition C.8 simply states that any testing must be performed pursuant to 326 IAC 3-6. If IDEM orders testing at the source, or if testing is required by a current or future federal or state requirement, this provision will apply. Therefore, the Condition stands as written.

To accommodate the request for clarification, the requested change will be incorporated in this Addendum to the TSD, not in the TSD itself:

Testing Requirements

The Permittee is not required to test these facilities by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance.

Permit Section D.2

Comment 2:

The grinding booth referenced in Condition D.2.6(b) vents back into the booth, making visible emissions notations unnecessary.

Response 2:

Condition D.2.6(b) references the requirement in Condition D.2.4(b). This requirement is simply to check the filters in the grinding booth daily for placement, integrity, and particle loading. There is no requirement to observe actual vented emissions. The permit will not be changed.

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:	Godfrey Conveyor Company, Inc., dba Godfrey Marine
Source Location:	4500 Middlebury Street, Elkhart, Indiana 46516
County:	Elkhart
SIC Code:	3732
Permit Renewal No.:	T039-19656-00267
Permit Reviewer:	Stephanie Wilkerson

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Godfrey Conveyor Company, Inc., dba Godfrey Marine, relating to the operation of a stationary fiberglass and aluminum boat manufacturing facility.

History

On July 1, 2004, Godfrey Conveyor Company, Inc., dba Godfrey Marine, submitted an application to the OAQ requesting to renew its operating permit. Godfrey Conveyor Company, Inc., dba Godfrey Marine, was issued Part 70 Operating Permit T039-8962-00267 on March 31, 2000.

Source Definition

This Source Definition from the original Part 70 Operating Permit was incorporated into this permit as follows:

This fiberglass and aluminum boat manufacturing company consists of six (6) plants:

- (1) Plant 2 (PONTOON) is located at 4310 Middlebury Street, Elkhart, Indiana 46516;
- (2) Plant 3 (METAL FAB) is located at 631 Bullard Road, Elkhart, Indiana 46516;
- (3) Plant 6 (HURRICANE) is located at 720 CR 15, Elkhart, Indiana 46516;
- (4) Plant 7 (WOOD SHOP) is located at 651 Bullard Road, Elkhart Indiana 46516;
- (5) Plant 8 (ENGINE WHS) is located at 4301 Bullard Road, Elkhart Indiana 46516; and
- (6) Plant 9 (MOLD SHOP) is located at 430 CR 15, Elkhart Indiana 46516.

Note: "Plant" in this case refers to building numbers. Most of the operations are performed in Plant 6 and Plant 9. Woodworking operations are located in Plant 7.

Since the six (6) plants are located on contiguous properties, and are owned by one (1) company, they will be considered one (1) source.

Permitted Emission Units and Pollution Control Equipment

- (a) One (1) fiberglass application area, identified as the General Lamination Department, consisting of the following components:
 - (1) Three (3) gel coat booths, identified as gel6-01, gel6-02, and gel6-03, each with a maximum capacity of 496 pounds of gel coat per hour, utilizing air-assisted airless spray guns and dry filters for particulate control, and exhausting to three (3) stacks, identified as EF6-1, EF6-12, and EF6-13;

- (2) Thirteen (13) fiberglass chop stations, identified as chop6-01, chop6-02, chop6-03, chop6-04, chop6-05, chop6-06, chop6-07, chop6-10, chop6-11, chop6-12, chop6-13, chop6-14, and chop6-15, each with a maximum capacity of 525 pounds of resin per hour, utilizing flowcoating, all exhausting to nine (9) stacks, identified as EF6-4, EF6-5, EF6-6, EF6-7, EF6-8, EF6-9, EF6-14, EF6-15, and EF6-16; and
 - (3) One (1) bilge gelcoat process booth, identified as Bilge Coating, utilizing one (1) air assisted airless spray gun and dry filters for particulate control, with a maximum capacity of 21 units per hour, exhausting to one (1) stack, identified as EF6-9. This was formerly known as the bilge painting process.
- (b) One (1) fiberglass application area used for the production of master boat molds, identified as the Mold Department, consisting of the following components:
- (1) One (1) gel coat booth, identified as gel9-01, with a maximum capacity of 496 pounds of gel coat per hour, utilizing airless spray guns and dry filters for particulate control, exhausting to one (1) stack, identified as EF9-1; and
 - (2) One (1) fiberglass chop booth, identified as chop9-01, with a maximum capacity of 525 pounds of resin per hour, utilizing flowcoating, exhausting to one (1) stack, identified as EF9-2. This was formerly known as the bilge painting process.

Under 40 CFR 63, Subpart VVVV, all emission units in this section are considered existing units in an existing affected source.

- (c) One (1) grinding booth, located in Plant 6, with a maximum capacity of 543 pounds of flange material processed per hour, equipped with dry filters for particulate matter control, exhausting to the inside of the booth.
- (d) Four (4) woodworking machines, located in Plant 7, with a total maximum throughput of 729 pounds per hour, with one (1) baghouse collector for particulate matter control, exhausting to the atmosphere.
- (e) One (1) fiberglass application area used for the production of master boat molds, identified as the Mold Department, consisting of the following components:
 - (1) One (1) gel coat booth, identified as gel9-01, with a maximum capacity of 496 pounds of gel coat per hour, utilizing airless spray guns and dry filters for particulate control, exhausting to one (1) stack, identified as EF9-1; and
 - (2) One (1) fiberglass chop booth, identified as chop9-01, with a maximum capacity of 525 pounds of resin per hour, utilizing flowcoating, exhausting to one (1) stack, identified as EF9-2.

Under 40 CFR 63, Subpart VVVV, all emission units in this section are considered existing units in an existing affected source.

Insignificant Activities

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:
 - (1) Four (4) natural gas-fired air make up units with a total heat input capacity of 13.034 MMBtu/hr;

- (2) Seven (7) infrared exhaust heaters with a total heat input capacity of 0.785 MMBtu/hr;
 - (3) Twenty-three (23) natural gas-fired space heaters with a total heat input capacity of 5.1 MMBtu/hr; and
 - (4) Five (5) natural gas-fired water heaters with a total heat input capacity of 0.19 MMBtu/hr.
- (b) The following VOC and HAP storage containers:
- (1) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (c) Equipment used exclusively for the following:
- (1) Packaging lubricants or greases; and
 - (2) Filling drums, pails or other packaging containers with lubricating oils, waxes, and greases.
- (d) Degreasing operations that do not exceed 145 gallons per twelve (12) months, except if subject to 326 IAC 20-6 [326 IAC 8-3-2] [326 IAC 8-3-5].
- (e) Cleaners and solvents characterized as follows:
- (1) Having a vapor pressure equal to or less than two (2) kPa; fifteen (15) mm Hg; or three-tenths (0.3) psi measured at 38 degrees C (100°F) or;
 - (2) Having a vapor pressure equal to or less than seven-tenths (0.7) kPa; five (5) mm Hg; or one-tenth (0.1) psi measured at 20 degrees C (68°F);
- the use of which for all cleaners and solvents combined does not exceed 145 gallons per twelve (12) months.
- (f) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment:
- (1) Eleven (11) TIG welding units and eleven (11) MIG welding units located in Plant 1;
 - (2) One (1) MIG welding station located in Plant 9; and
 - (3) Metal fabrication operations located in Plant 3 consisting of ten (10) TIG welding units and four (4) MIG welding units.
- (g) Solvent recycling systems with batch capacity less than or equal to 100 gallons.
- (h) Any operation using aqueous solutions containing less than 1% by weight of VOCs, excluding HAPs.
- (i) Water based adhesives that are less than or equal to 5% by volume of VOCs, excluding HAPS:
- (1) One (1) vinyl floor roll-on station, located in Plant 1;
 - (2) One (1) carpeting roll-on station, located in Plant 1; and

- (3) One (1) carpet adhesive roll-on station and one (1) vinyl adhesive roll-on station, located in Plant 2.

Under 40 CFR 63, Subpart VVVV, all emission units in this section are considered existing units in an existing affected source.

- (j) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone.
- (k) Paved and unpaved roads and parking lots with public access [326 IAC 6-4].
- (l) Emergency generators as follows:
 - (1) Gasoline generators not exceeding 110 horsepower;
 - (2) Diesel generators not exceeding 1,600 horsepower; and
 - (3) Natural gas turbines or reciprocating engines not exceeding 16,000 horsepower.
- (m) Mold release agents using low volatile products (vapor pressure less than or equal to two (2) kilopascals measured at 38 degrees C).
- (n) Activities or categories of activities with individual HAP emissions not previously identified; any emitting unit greater than one (1) pound per day but less than five (5) pounds per day or one (1) ton per year of a single HAP:
 - (1) Spot repair/touch-up paint of steel and/or aluminum frame members using hand held spray cans located in Plant 2, Plant 5, and Plant 6;
 - (2) Spot repair/touch-up paint of fiberglass boats using hand held spray cans located in Plant 6 in the general laminating department;
 - (3) Spot repair/touch-up gel coat of fiberglass boats and/or parts, located in Plant 6 in the general laminating department, with air-atomized spray guns; and
 - (4) Spot repair/touch-up gel coat of fiberglass boats and/or parts, located in Plant 9.

Under 40 CFR 63, Subpart VVVV, all emission units in this section are considered existing units in an existing affected source.

- (o) Other activities or categories not otherwise identified:

Insignificant Thresholds:

Lead (Pb) = 0.6 ton/year or 3.29 lbs/day	Carbon Monoxide (CO) = 25 lbs/day
Sulfur Dioxides (SO ₂) = 5 lbs/hour or 25 lbs/day	Particulate Matter (PM) = 5 lbs/hour or 25 lbs/day
Nitrogen Oxides (NO _x) = 5 lbs/hour or 25 lbs/day	Volatile Organic Compounds (VOC) = 3 lbs/hour or 15 lbs/day

- (1) One (1) floatation foam injection station, located in Plant 6 in the general laminating department, with an air purge system for floatation foam application;
- (2) One (1) adhesive application operation of vinyl covers to seats, located in Plant 7, utilizing hand held spray cans;
- (3) One (1) surface preparation operation located in Plant 1, utilizing citrus based cleaner and glass cleaner;

- (4) One assembly operation located in Plant 2, utilizing one (1) portable glue gun, one (1) putty gun using polyester putty for caulking, hand held guns using urethane caulks and silicone sealants, and spray cans of adhesive;
- (5) One (1) glue station located in Plant 6 utilizing a reactive adhesive that is applied by one (1) metered hand applicator; and
- (6) One (1) surface coating application area, used to make patterns for master molds.

Under 40 CFR 63, Subpart VVVV, emission units (2) through (6) in this section are considered existing units in an existing affected source.

Existing Approvals

Since the issuance of the Part 70 Operating Permit T039-8962-00267 on March 31, 2000, the source has constructed or has been operating under the following approvals as well:

- (a) Significant Source Modification No. 039-12158-00267, issued August 9, 2000;
- (b) Administrative Amendment No. 039-12414-00267, issued August 25, 2000;
- (c) Permit Reopening No. 039-13238-00267, issued January 15, 2002;
- (d) Administrative Amendment No. 039-15329-00267, issued February 22, 2002;
- (e) Administrative Amendment No. 039-15771-00267, issued May 17, 2002;
- (f) Administrative Amendment No. 039-18705-00267, issued March 4, 2004; and
- (g) Administrative Amendment No. 039-24684-00267, issued June 21, 2007.

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

Air Pollution Control Justification as an Integral Part of the Process

The applicant has submitted the following information to justify why the baghouse should be considered an integral part of its woodworking operations.

- (a) The primary purpose of the baghouse is to allow continuous operation of the woodworking equipment. Specifically, the baghouse keeps the cutting surface clear of wood chips that would clog the equipment and cause a potential fire hazard. This would require that the production line be shut down in order to clear the equipment.
- (b) The baghouse is used to control dust so that workers can work in the area without damage to their health. The baghouse would be in use even without the air quality requirements.
- (c) If the baghouse was to malfunction, production at this part of the facility could not continue. The gelcoats applied to the boats is susceptible to dust entrainment and would be ruined if the baghouse was not used. The annual cost to operate the baghouse is less than the cost of replacing the outer shell of a boat.

IDEM, OAQ has determined that the baghouse used for PM/PM₁₀ control of the woodworking operations at this stationary fiberglass and aluminum boat manufacturing facility is an integral part of the woodworking operation. Therefore, the permitting level will be determined using the potential to emit after the applicable controls. Operating conditions in the proposed permit will

specify that the baghouse shall operate at all times when the woodworking operation is in operation.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
EF6-1	Plant 6 Gel Coat	22	0.83	2,060	70
EF6-4	Plant 6 Flowcoating	22	2	9,110	70
EF6-5	Plant 6 Flowcoating	22	2	9,110	70
EF6-6	Plant 6 Flowcoating	22	2	9,110	70
EF6-7	Plant 6 Flowcoating	22	2	9,110	70
EF6-8	Plant 6 Flowcoating	22	2	9,110	70
EF6-9	Plant 6 Bilge Coating	30	3	31,531	70
EF6-12	Plant 6 Gel Coat	30	3	31,531	70
EF6-13	Plant 6 Gel Coat	30	3	31,531	70
EF6-14	Plant 6 Flowcoating	22	2	9,110	70
EF6-15	Plant 6 Flowcoating	22	2	9,110	70
EF6-16	Plant 6 Flowcoating	22	2	9,110	70
Baghouse Vent	Woodworking	22	2	20,000	70
EF9-1	Plant 9 Gel Coat	1	3	14,000	70
EF9-2	Plant 9 Flowcoating	2	3	14,000	70

Emission Calculations

See Appendix A of this document for detailed emission calculations.

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM ₁₀	Attainment
PM _{2.5}	Attainment
SO ₂	Attainment
NO _x	Attainment
8-hour Ozone	Attainment
CO	Attainment
Lead	Attainment

Note: On September 6, 2007 the Indiana Air Pollution Control Board finalized a temporary emergency rule to redesignate Allen, Clark, Elkhart, Floyd, LaPorte, and St. Joseph Counties as attainment for the 8-hour ozone standard.

- (a) Elkhart County has been classified as attainment for PM_{2.5}. 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 PM_{2.5} emissions, it has directed states to regulate PM₁₀ emissions as a surrogate for PM_{2.5} emissions. See the State Rule Applicability – Entire Source section.
- (b) Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC emissions and NO_x emissions are considered when evaluating the rule applicability relating to ozone. Elkhart County has been designated as attainment for ozone. Therefore, VOC emissions and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.
- (c) Elkhart County has been classified as attainment in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.
- (d) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 revoking the one-hour ozone standard in Indiana.
- (e) Fugitive Emissions
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD applicability.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source using the worst-case coating from each emission unit.

Pollutant	tons/year
PM	21,737.14
PM ₁₀	21,737.24
SO ₂	0.0
VOC	1,031.19
CO	1.10
NO _x	1.30

HAPs	tons/year
Styrene	908.52
Methyl Methacrylate	99.23
Total	1,007.84

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM₁₀ and VOC is greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is greater than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

Fugitive Emissions

Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-7, fugitive emissions are not counted toward the determination of Part 70 applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2006 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	0.0
PM-10	0.0
SO ₂	-
VOC	41.574
CO	-
NO _x	-
HAP - Methyl Methacrylate	Not Reported
HAP - Styrene	Not Reported

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 assume 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	PM10	SO ₂	VOC	CO	NO _x	HAPs
Plant 6 - Gel Coat Booths	91.37	91.37	-	<220	-	-	<220
Plant 6 - Flowcoating	Neg.*	Neg.*	-		-	-	
Plant 6 - Bilge Coating	20.95	20.95	-	<15	-	-	<15
Plant 9 Fiberglass Operations	9.80	9.80	-	<10	-	-	<10
Flange Grinding	3.09	3.09	-	-	-	-	-
Woodworking	0.08	0.08	-	-	-	-	-
Insignificant Activities	3.85	3.95	0.00	<5	1.10	1.30	<5
Total	129.14	129.24	0.00	<250	1.10	1.30	<250
PSD/HAP Major Source Threshold	250	250	250	250	250	250	10 Single/ 25 Combined

* - Negligible amount of pollutant emitted from this emission unit.

- (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.

Federal Rule Applicability

- (a) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to each existing pollutant-specific emission unit that meets 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 or Standard (Y/N)	Uncontrolled PTE (tons/year)	Controlled PTE (tons/year)	Major Source Threshold (tons/year)	CAM Applicable (Y/N)	Large Unit (Y/N)
Plant 6 Flowcoating - PM/PM10	N	N	Negligible	Negligible	100	N	N
Plant 6 Flowcoating - VHAP	N	Y	398.21	<220	100	N	N
Plant 6 Gel Coat - VHAP	N	Y	621.11		100	N	N
Plant 6 Gel Coat - PM/PM10	Y	Y	10,457.94	91.37	100	Y	N
Plant 6 Bilge Coat - PM/PM10	Y	Y	8,689.05	20.95	100	Y	N
Plant 6 Bilge Coat - VHAP	N	Y	309.90	<15	100	N	N
Plant 9 Fiberglass - PM/PM10	Y	Y	2,524.42	9.80	100	Y	N
Plant 9 Fiberglass - VHAP	N	Y	71.95	<10	100	N	N
Flange Grinding - PM/PM10	Y	Y	61.80	3.09	100	N	N
Woodworking - PM/PM10	Y	Y	814.70	0.08	100	Y	N

Based on this evaluation, the requirements of 40 CFR Part 64, CAM, are applicable to the woodworking and gel coat operations for PM/PM10 upon issuance of the Title V Renewal. A CAM plan will be incorporated into this Part 70 permit renewal.

- (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) This source is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Boat Manufacturing (40 CFR Part 63, Subpart VVVV), which is incorporated by reference as 326 IAC 20-48.

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

- (1) 40 CFR 63.5680
- (2) 40 CFR 63.5683
- (3) 40 CFR 63.5689
- (4) 40 CFR 63.5692
- (5) 40 CFR 63.5695
- (6) 40 CFR 63.5698
- (7) 40 CFR 63.5701
- (8) 40 CFR 63.5704
- (9) 40 CFR 63.5707
- (10) 40 CFR 63.5710

- (11) 40 CFR 63.5713
- (12) 40 CFR 63.5714
- (13) 40 CFR 63.5715
- (14) 40 CFR 63.5716
- (15) 40 CFR 63.5719
- (16) 40 CFR 63.5722
- (17) 40 CFR 63.5725
- (18) 40 CFR 63.5731
- (19) 40 CFR 63.5734
- (20) 40 CFR 63.5737
- (21) 40 CFR 63.5740
- (22) 40 CFR 63.5743
- (23) 40 CFR 63.5746
- (24) 40 CFR 63.5749
- (25) 40 CFR 63.5752
- (26) 40 CFR 63.5753
- (27) 40 CFR 63.5755
- (28) 40 CFR 63.5758
- (29) 40 CFR 63.5761
- (30) 40 CFR 63.5764
- (31) 40 CFR 63.5767
- (32) 40 CFR 63.5770
- (33) 40 CFR 63.5773
- (34) 40 CFR 63.5776
- (35) 40 CFR 63.5779

The provisions of 40 CFR Part 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 Part 63, Subpart VVVV.

- (d) The requirements of the NESHAP for Halogenated Solvent Cleaning (40 CFR Part 63, Subpart T and 326 IAC 20-6) are not applicable because the source does not use halogenated solvent in the degreasers onsite. These requirements are not included in this permit.
- (e) This source is not subject to the requirements of the NESHAP: Reinforced Plastic Composites Production (40 CFR Part 63, Subpart WWWW and 326 IAC 20-56) because the source is subject to 40 CFR 63, Subpart VVVV and all reinforced plastics composites manufacturing is for the manufacture of boats (40 CFR 63.5787(b)). These requirements are not included in this permit.
- (f) This source is not subject to the requirements of the NESHAP for Surface Coating of Plastic Parts and Products (40 CFR Part 63, Subpart PPPP and 326 IAC 20-81) because the source is subject to the requirements of 40 CFR 63, Subpart VVVV, and there are no post-mold surface coating operations at the facility (40 CFR 63.4481(c)(15)). These requirements are not included in this permit.

State Rule Applicability - Entire Source

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

The source submitted an Emergency Reduction Plan (ERP) on May 15, 2000. This ERP has been verified to fulfill the requirements of 326 IAC 1-5-2 (Emergency Reduction Plans).

326 IAC 1-6-3 (Preventive Maintenance Plan)

The source submitted a Preventive Maintenance Plan (PMP) on September 11, 1997. This PMP has been verified to fulfill the requirements of 326 IAC 1-6-3 (Preventive Maintenance Plan).

326 IAC 2-2 (Prevention of Significant Deterioration)

The source-wide potential to emit VOC, PM₁₀, and PM each shall be limited to less than 250 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

- (a) The use of resins and gel coats shall be limited such that the PTE of VOC from the fiberglass operations identified as the General Lamination Department (gel coat and chop booths) is limited to less than 220 tons per twelve (12) consecutive month period with compliance determined at the end of each month. 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.
- (b) The use of resins and gel coats shall be limited such that the PTE of VOC from the fiberglass operations identified as Bilge Coating is limited to less than fifteen (15) tons per twelve (12) consecutive month period with compliance determined at the end of each month. 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.
- (c) The use of resins and gel coats shall be limited such that the PTE of VOC from the fiberglass operations identified as Mold Department is limited to less than ten (10) tons per twelve (12) consecutive month period with compliance determined at the end of each month. 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.
- (d) The controlled potential to emit for PM₁₀ and PM from the source shall be limited to less than a total of 250 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
 - (1) To comply with this limit, the source shall maintain the use of dry particulate filters for each of the fiberglass gel coat operations. The filters shall have a minimum control efficiency of 95%, and shall be in use at all times the booths are in operation.
- (e) Compliance with these limits makes 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

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

The operation of this source will emit greater than ten (10) tons per year for a single HAP and greater than twenty-five (25) tons per year for a combination of HAPs; however, pursuant to 326 IAC 2-4.1-1(b)(2), because this source is specifically regulated by NESHAP 40 CFR 63, Subpart VVVV, which was issued pursuant to Section 112(d) of the CAA, this source is exempt from the requirements of 326 IAC 2-4.1.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting) because it is required to have an operating permit under 326 IAC 2-7, Part 70 program. Pursuant to this rule, the Permittee shall submit an emission statement certified pursuant to the requirements of 326 IAC 2-6. Because the source is not located in Lake, Porter, or LaPorte Counties and does not have a potential to emit greater than the thresholds given in 326 IAC 2-6-3(a)(1), the source shall submit an emissions report on a triennial basis, rather than an annual basis.

- (a) In accordance with the compliance schedule specified in 326 IAC 2-6-3, an emission statement must be submitted triennially by July 1 beginning in 2004 and every 3 years after. Therefore, the next emission statement for this source must be submitted by July 1, 2007. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

326 IAC 5-1 (Opacity Limitations)

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

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

State Rule Applicability – Individual Facilities

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

- (a) The source performs reinforced plastics composites manufacturing. Pursuant to 326 IAC 6-3-2(d), particulate from the reinforced plastics composites fabricating manufacturing processes shall be controlled by a dry particulate filter and the Permittee shall operate the control device in accordance with manufacturer's specifications.
- (b) The allowable PM emission rate for the woodworking operations shall not exceed 2.09 pounds of PM per hour when operating at a process weight rate of 0.365 tons per hour, total. The uncontrolled potential to emit of the woodworking operations is 186 pounds of PM per hour. This limit is based on the following equation:

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:

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

Where E = rate of emissions in pounds per hour and
 P = process weight rate in tons per hour.

The source is able to comply with this limit when using the baghouse to control PM emissions for this manufacturing process. Therefore, the source must operate this control device at all times the woodworking operations are in operation.

- (c) The allowable PM emission rate for the flange grinding operations shall not exceed 1.71 pounds of PM per hour when operating at a process weight rate of 0.272 tons per hour, total. The uncontrolled potential to emit of the flange grinding operations is 14.1 pounds of PM per hour. This limit is based on the following equation:

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:

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

Where E = rate of emissions in pounds per hour and
 P = process weight rate in tons per hour.

The source is able to comply with this limit when using the dry filters to control PM emissions for this manufacturing process. Therefore, the source must operate these control devices at all times the flange grinding operations are in operation.

- (d) The sixteen (16) MIG welding stations are not subject to the requirements of 326 IAC 6-3-2 because they are manufacturing processes with potential emissions less than five hundred fifty-one thousandths (0.551) pound per hour.

- (e) The twenty-one (21) TIG welding stations are not subject to the requirements of 326 IAC 6-3-2 because they are manufacturing processes with potential emissions less than five hundred fifty-one thousandths (0.551) pound per hour.

326 IAC 8-1-6 (BACT)

The source requested that the naming of the different areas be changed for flexibility. Therefore, "Plant 6 Fiberglass" operations are changed to General Lamination department; "Plant 9 Fiberglass" operations are changed to Mold Department; and the bilge coating will be named Bilge Coating. No other changes were made to the BACT requirements of the previous permits, as follows:

- (a) Pursuant to Part 70 Operating Permit No. T039-8962-00267, issued to the source on March 31, 2000, and the Significant Source Modification No. 039-12158-00267, the requirements of 326 IAC 8-1-6 are applicable to the fiberglass gel coat booths, identified as gel6-01 through gel6-03, and the thirteen (13) fiberglass chop stations, identified as chop6-01 through chop6-07 and chop6-10 through chop6-15, located in the General Lamination department. Pursuant to 326 IAC 8-1-6, Best Available Control Technology for the fiberglass application areas located in the General Lamination department, consisting of gel6-01 through gel6-03, chop6-01 through chop6-07, and chop6-10 through chop6-15 shall be:

- (1) Use of resins and gel coats shall be limited such that the potential to emit (PTE) of volatile organic compounds for the fiberglass application area located in the General Lamination department, consisting of gel6-01, gel6-02 and gel6-03 and chop6-01, chop6-02, chop6-03, chop6-04, chop6-05, chop6-06, chop6-07, chop6-10, chop6-11, chop6-12, chop6-13, chop6-14 and chop6-15 shall be less than 220 tons per twelve (12) consecutive month period. Compliance with this limit shall be determined based upon the following criteria:

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

- (B) Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA-approved form, emission factors shall be taken from the following reference approved by IDEM, OAQ: "Unified Emission Factors for Open Molding of Composites, July 23, 2001. The emission factors used for monomers that is styrene shall not exceed 32.3% styrene emitted per weight of gel coat applied and 17.7% styrene emitted per weight of resin applied. For the purposes of these emission calculations, monomer in resins and gel coats that is not styrene or methylmethacrylate shall be considered as styrene on an equivalent weight basis.

- (2) The total monomer contents of all resins and gel coats used shall be limited to 35 percent (35%) by weight for resins, 37 percent (37%) by weight for gel coats or their equivalent on an emissions mass basis. Monomer contents shall be calculated on a neat basis, i.e., excluding any filler. Compliance with these monomer content limits shall be demonstrated on a monthly basis.

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

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

Where: Emissions, lb or ton = M (mass of resin or gel coat used, lb or ton) * EF (Monomer emission factor for resin or gel coat used, %);

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

- (3) Flow coaters, a type of non-spray application technology of a design and specifications to be approved by IDEM, OAQ, shall be used at all times to apply unfilled and filled resins.
- (4) Optimized spray technology approved by IDEM shall be used at all times to apply gel coats and filled resins. Optimized spray techniques include, but are not limited to, the use of airless, air-assisted airless, high volume low pressure (HVLP), or other spray applicators demonstrated to the satisfaction of IDEM, OAQ, to be equivalent to the spray applicators listed above.

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

- (5) A one (1) quart, air atomized spray gun may be used as needed for touch up purposes only.
- (6) The listed work practices shall be followed:
 - (A) To the extent possible, a non-VOC, non-HAP solvent shall be used for cleanup.
 - (B) For solvents that are VOC:
 - (i) Cleanup solvent containers used to transport solvent from drums to work stations shall be closed containers having soft gasketed spring-loaded closures.
 - (ii) Cleanup rags saturated with solvent shall be stored, transported, and disposed of in containers that are closed tightly.
 - (iii) The spray guns used shall be the type that can be cleaned without the need for spraying the solvent into the air.

- (iv) All solvent sprayed during cleanup or resin changes shall be directed into containers. Such containers shall be closed when not in use. The waste solvent shall be handled in such a manner that evaporation is minimized, and managed in accordance with applicable solid or hazardous waste requirements.
 - (v) Storage containers shall be kept covered when not in use.
- (b) Pursuant to 326 IAC 8-1-6(3)(B), the Bilge Coating and the Mold Department fiberglass operations are not subject to the requirements of 326 IAC 8-1-6 (BACT). These operations were previously limited to VOC emissions less than 25 tons per year to avoid BACT requirements and the source is subject to the requirements of 326 IAC 20-48 (Emission Standards for Hazardous Air Pollutants for Boat Manufacturing).

326 IAC 8-3 (Organic Solvent Degreasing Operations)

The source is located in Elkhart County, has the potential to emit more than one hundred (100) tons per year, and has degreasing operations that were in existence before January 1, 1980. Therefore, pursuant to 326 IAC 8-3-1, this source has the following applicable requirements:

- (a) 326 IAC 8-3-2 (Cold Cleaner Operation)
The owner or operator of a cold cleaning facility shall:
- (1) equip the cleaner with a cover;
 - (2) equip the cleaner with a facility for draining cleaned parts;
 - (3) close the degreaser cover whenever parts are not being handled in the cleaner;
 - (4) drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
 - (5) provide a permanent, conspicuous label summarizing the operating requirements;
 - (6) store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

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

Pursuant to 326 IAC 20-48-1(a) and, by reference, 40 CFR 63.5683, the source is subject to the requirements of 326 IAC 20-48 because the source manufactures fiberglass boats and is a major source for hazardous air pollutants (HAPs).

- (a) Pursuant to 326 IAC 20-48-2 (Alternative Organic HAP Content Requirements for Open Molding Gel Coat Operations), in addition to the 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		
For this operation	and this application method	You must not exceed this weighted-average percent organic HAP content (weight percent) requirement
Pigmented gel coat operations	Atomized (spray)	33 percent
Clear gel coat operations	Atomized (spray)	48 percent
Tooling gel coat operations	Atomized (spray)	40 percent
Pigmented gel coat operations	Nonatomized (nonspray)	40 percent
Clear gel coat operations	Nonatomized (nonspray)	55 percent
Tooling gel coat operations	Nonatomized (nonspray)	54 percent

- (b) Pursuant to 326 IAC 20-48-3 (Work Practice Standards), in addition to 40 CFR 63.5731 and 40 CFR 63.5734(b), the following work practice standards are required:
- (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 (HAPs). However, recycled cleaning solvents that contain less than or equal to five percent (5%) HAP by weight are considered to contain no HAP for the purposes of this subdivision. For removing cured resin or gel coat from application equipment, no organic HAP limit applies.
 - (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 HAPs.
 - (B) All production and tooling gel coats that contain HAPs.
 - (C) Waste resins and gel coats that contain HAPs.
 - (D) Cleaning materials, including waste cleaning materials.
 - (E) Other materials that contain HAPs.

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

- (1) All personnel hired shall be trained within fifteen (15) days of hiring.
- (2) To ensure training goals listed in subsection (b) are maintained, all personnel shall be given refresher training annually.
- (3) Personnel who have been trained by another owner or operator subject to this rule are exempt from subdivision (1) if written documentation that the employee's training is current is provided to the new employer.

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.

The owner or operator shall maintain the following training records on site and available for inspection and review:

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

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

326 IAC 20-56 (Reinforced Plastics Composites Production)

Pursuant to 326 IAC 20-56-1(a) and, by reference, 40 CFR 63.5785 and 40 CFR 63.5787, the source is not subject to the requirements of 326 IAC 20-56 and 40 CFR Part 63, Subpart WWWW because the source is subject to 40 CFR Part 63, Subpart VVVV (incorporated by reference in 326 IAC 20-48) and all reinforced plastic composites manufactured are used by the source in the manufacture of boats.

Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a 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 Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

If the Compliance Determination Requirements 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 determination requirements applicable to the fiberglass gel coat operations and bilge coating operations are as follows:

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

The compliance monitoring requirements applicable to the fiberglass gel coat operations, bilge coating operations, and flange grinding operations are as follows:

- (a) Daily inspections shall be performed to verify the placement, integrity, and particle loading of the filters for all fiberglass gel coat operations, bilge coating operations, and flange grinding operations. To monitor the performance of the dry filters in the fiberglass gel coating and bilge coating booths, weekly observations shall be made of the overspray from the stacks identified as EF6-1, EF6-9, EF6-12, EF6-13, and EF9-1 while the associated 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 particulate emissions from the stacks identified as EF6-1, EF6-9, EF6-12, EF6-13, and EF9-1 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 compliance monitoring conditions are necessary because the dry particulate filters for the fiberglass gel coat operations, bilge coating operations, and flange grinding operations must operate properly to ensure compliance with 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes), 326 IAC 2-7 (Part 70), and 40 CFR 64 (CAM).

The compliance monitoring requirements applicable to the woodworking operations are as follows:

- (a) The baghouse for PM control shall be in operation at all times when any of the four (4) woodworking machines is in operation.
- (1) The Permittee shall record the pressure drop across the baghouse used in conjunction with the woodworking process, at least once per day when the woodworking process is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions and Exceedances. A pressure reading that is outside the aforementioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions and Exceedances shall be considered a deviation from this permit.
- The instrument used for determining the pressure drop shall comply with Section C - Instrument Specifications of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.
- (2) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations

may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

- (3) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emissions unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Bag failure can be indicated by a significant drop in the baghouse pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces, or triboflows.

- (4) Visible Emission Notations
- (A) Daily visible emission notations of the woodworking operations' baghouse vent shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (B) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (C) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (D) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (E) If abnormal emissions are observed, the Permittee shall take reasonable steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Excursions or Exceedances shall be considered a deviation from this permit.

These compliance monitoring conditions are necessary because the baghouse for the woodworking operations must operate properly to ensure compliance with 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes), 326 IAC 2-7 (Part 70), and 40 CFR 64 (CAM).

Recommendation

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

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

An application for the purposes of this review was received on July 1, 2004. Additional information was received on August 8, 2007, August 9, 2007, August 15, 2007, August 20, 2007, and September 10, 2007.

Conclusion

The operation of this stationary fiberglass and aluminum boat manufacturing facility shall be subject to the conditions of the attached Part 70 Operating Permit Renewal No. T039-19656-00267.

Appendix A: Emissions Calculations
Natural Gas Combustion - All Insignificant Activities
MM BTU/HR <100

Company Name: Godfrey Conveyor Company, Inc., dba Godfrey Marine
Address City IN Zip: 4500 Middlebury Street, Elkhart, IN 46516
Permit Number: T039-19656-00267
Source ID: 039-00267
Reviewer: Stephanie Wilkerson
Date: September 19, 2007

Heat Input Capacity
MMBtu/hr

3.0

Potential Throughput
MMCF/yr

26.0

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.0	0.1	0.0	1.3	0.1	1.1

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

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

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

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

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

See page 2 for HAPs emissions calculations.

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

Company Name: Godfrey Conveyor Company, Inc., dba Godfrey Marine
Address City IN Zip: 4500 Middlebury Street, Elkhart, IN 46516
Permit Number: T039-19656-00267
Pit ID: 039-00267
Reviewer: Stephanie Wilkerson
Date: September 19, 2007

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	2.732E-05	1.561E-05	9.756E-04	2.342E-02	4.423E-05

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
Potential Emission in tons/yr	6.504E-06	1.431E-05	1.821E-05	4.943E-06	2.732E-05

Methodology is the same as page 1.

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
PM/PM10 Emissions
Flange Material Grinding

Company Name: Godfrey Conveyor Company, Inc., dba Godfrey Marine
Address City IN Zip: 4500 Middlebury Street, Elkhart, IN 46516
Permit Number: T039-19656-00267
Plt ID: 039-00267
Reviewer: Stephanie Wilkerson
Date: August 18, 2007

Process Description:

Max. Process Rate: 543 lbs/hr
PM Control Equipment: Dry filters
Source-Determined Emission Factor*: 0.0013 lbs PM/lb material processed
Control Efficiency: 95%

1. Potential to Emit After Control:

Hourly PM/PM10 Emissions =(max process rate)*(EF) **0.71 lbs/hr**
Annual PM/PM10 emissions =(hourly PM emissions lb/hr)*(8760 hr/yr)*(1 ton/2000 lbs) **3.09 tons/yr**

2. Potential Uncontrolled Emissions:

Hourly PM/PM10 emissions =(controlled emission rate lb/hr)/(1-control efficiency) **14.1 lbs/hr**
Annual PM/PM10 emissions =(controlled hourly emissions lb/hr)*(8760 hr/yr)*(1 ton/2000 lbs) **61.8 tons/yr**

*Source Determined Emission Factor from calculations presented for original permit application, data received 11/4/94.

**Appendix A: Emission Calculations
PM/PM10 Emissions
Woodworking**

Company Name: Godfrey Conveyor Company, Inc., dba Godfrey Marine
Address City IN Zip: 4500 Middlebury Street, Elkhart, IN 46516
Permit Number: T039-19656-00267
Plt ID: 039-00267
Reviewer: Stephanie Wilkerson
Date: September 18, 2007

1. Woodworking Process Description:

Max. Process Rate: 729 lbs/hr
 PM Control Equipment: Baghouse
 Grain Loading: 0.000434 grains/acf
 Air Flow Rate: 5000 acf/m
 Control Efficiency: 99.99%

1. Potential to Emit After Control:

Hourly PM/PM10 Emissions =(outlet grain loading gr/dscf)*(air flow dscf/cfm)*(60 min/hr)/(7000 gr/lb)	0.02 lbs/hr
Annual PM/PM10 emissions =(hourly PM emissions lb/hr)*(8760 hr/yr)*(1 ton/2000 lbs)	0.08 tons/yr

IDEM, OAQ has determined that the baghouse used for PM/PM₁₀ control of the woodworking operations at this stationary fiberglass and aluminum boat manufacturing facility is an integral part of the woodworking operation. Therefore, the permitting level will be determined using the potential to emit after the applicable controls. Operating conditions in the proposed permit will specify that the baghouse shall operate at all times when the woodworking operation is in operation.

Appendix A: Emissions Calculations

Welding and Thermal Cutting

Company Name: Godfrey Conveyor Company, Inc., dba Godfrey Marine
Address City IN Zip: 4500 Middlebury Street, Elkhart, IN 46516
Permit Number: T039-19656-00267
Pit ID: 039-00267
Reviewer: Stephanie Wilkerson
Date: September 19, 2007

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)	EMISSION FACTORS* (lb pollutant/lb electrode)				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
			PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
WELDING											
Metal Inert Gas (MIG)	16	1.23	0.0055	0.0005			0.108	0.010	0.000	0	0.010
Tungsten Inert Gas (TIG)	21	0.4	0.0055	0.0005			0.046	0.004	0.000	0	0.004
EMISSION TOTALS											
Potential Emissions lbs/hr							0.15				0.01
Potential Emissions lbs/day							3.71				0.34
Potential Emissions tons/year							0.68				0.06

METHODOLOGY

*Emission Factors are default values for carbon steel unless a specific electrode type is noted in the Process column.
Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used)
Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day
Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/year x 1 ton/2,000 lbs

Appendix A: Emission Calculations
VOC Emission Calculations - Plant 2 Adhesives & Putty

Company Name: Godfrey Conveyor Company, Inc., dba Godfrey Marine
Address City IN Zip: 4500 Middlebury Street, Elkhart, IN 46516
Permit Number: T039-19656-00267
Plt ID: 039-00267
Permit Reviewer: Stephanie Wilkerson
Date: September 19, 2007

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % VOC	VOC Emissions (ton/yr)
Sea Grip 5000 Adhesive	6.83	0.160000	1.00	81.40%	3.90
In Line Super Tack					
Polytack III Adhesive	5	0.160000	1.00	51.60%	1.81

METHODOLOGY **Total Potential Emissions** **5.70**

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

Appendix A: Emission Calculations
HAP Emission Calculations - Plant 2 Adhesives & Putty

Company Name: Godfrey Conveyor Company, Inc., dba Godfrey Marine
Address City IN Zip: 4500 Middlebury Street, Elkhart, IN 46516
Permit Number: T039-19656-00267
Plt ID: 039-00267
Permit Reviewer: Stephanie Wilkerson
Date: September 19, 2007

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Styrene	HAP Emissions (ton/yr)
Valspar Low Visc EZ Bond (LNG Gel)	8.75	0.500000	1.00	25.00%	4.79

METHODOLOGY **Total Potential Emissions** **4.79**

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

Appendix A: Emission Calculations
VOC Emission Calculations - Plant 6

Company Name: Godfrey Conveyor Company, Inc., dba Godfrey Marine
Address City IN Zip: 4500 Middlebury Street, Elkhart, IN 46516
Permit Number: T039-19656-00267
Plt ID: 039-00267
Permit Reviewer: Stephanie Wilkerson
Date: August 9, 2007

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % VOC	VOC Emissions (ton/yr)
Zyvax Fiberglass Shield	7.31	0.625000	0.40	90.00%	7.20
Zyvax Surface Cleaner	7.05	1.000000	0.05	100.00%	1.54
Zyvax Sealer GP	7.31	0.750000	0.05	98.00%	1.18

METHODOLOGY

Total Potential Emissions

9.92

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

Zyvax Fiberglass Shield calculated to last for four (4) pulls over a ten (10) hour day.

Zyvax Surface Cleaner used to strip molds that need repair. This usage is estimated at one (1) repair every other day (20 hours of production).

Zyvax Sealer GP used to reseal molds that have been repaired. This usage is estimated at one (1) repair every other day (20 hours of production).

Appendix A: Emissions Calculations
Form DD: Reinforced Plastics and Composites
Open Molding Operations*
Gel Coat Usage - General Lamination

Company Name: Godfrey Conveyor Company, Inc., dba Godfrey Marine
Address City IN Zip: 4500 Middlebury Street, Elkhart, IN 46516
Permit: T039-19656-00267
Plt ID: 039-00267
Reviewer: Stephanie Wilkerson
Date: August 9, 2007

Material (Resin or Gel Name)	Monomer	Density (Lb/Gal)	Weight % Monomer	Maximum usage (lb/hour)	UEF (lbs monomer/ton resin or gel)	Potential VOC/HAP (pounds per day)	Potential VOC/HAP (tons per year)	Transfer Efficiency	Potential PM (tons/ year)
<i>Black Neo Gel Coat</i>	Styrene	9.5	40.00%	1488.000	439	3135.51	572.23	80%	6832.23
	Methyl Methacrylate	9.5	5.00%	1488.000	75	66.96	12.22	80%	
<i>97 Blue Gel Coat</i>	Styrene	10.3	25.00%	1488.000	222.5	993.24	181.27	80%	8692.96
	Methyl Methacrylate	10.3	10.00%	1488.000	150	267.84	48.88	80%	
<i>French Vanilla Armortflex</i>	Styrene	11.1	21.35%	1488.000	190.015	724.32	132.19	80%	10457.94
	Methyl Methacrylate	11.1	6.15%	1488.000	90	98.78	18.03	80%	
Hurricane White Gel Coat	Styrene	8.3	27.00%	1488.000	240.3	1158.52	211.43	80%	7573.27
	Methyl Methacrylate	8.3	3.00%	1488.000	45	24.11	4.40	80%	
Rodeo Red Gel Coat	Styrene	10.2	30.00%	1488.000	267	1430.27	261.02	80%	7938.24
	Methyl Methacrylate	10.2	10.00%	1488.000	150	267.84	48.88	80%	
Seagrass Gel Coat	Styrene	9.9	34.67%	1488.000	336	2080.29	379.65	80%	7938.78
	Methyl Methacrylate	9.9	3.81%	1488.000	60	40.79	7.44	80%	
Silver Blue Gel Coat	Styrene	10.3	24.61%	1488.000	219.029	962.31	175.62	80%	9217.70
	Methyl Methacrylate	10.3	6.87%	1488.000	105	128.84	23.51	80%	
Suede Gel Coat	Styrene	10.2	35.00%	1488.000	336	2099.87	383.23	80%	7977.35
	Methyl Methacrylate	10.2	5.00%	1488.000	75	66.96	12.22	80%	
HF Yellow Gel Coat	Styrene	10.2	30.00%	1488.000	267	1430.27	261.02	80%	7961.70
	Methyl Methacrylate	10.2	10.00%	1488.000	150	267.84	48.88	80%	
HI-FLX Ruby Red Gel Coat	Styrene	10.1	30.00%	1488.000	267	1430.27	261.02	80%	7930.42
	Methyl Methacrylate	10.1	10.00%	1488.000	150	267.84	48.88	80%	
HI-FLX Vapor Blue X Gel Coat	Styrene	10.4	25.00%	1488.000	222.5	993.24	181.27	80%	8828.52
	Methyl Methacrylate	10.4	10.00%	1488.000	150	267.84	48.88	80%	
HI-FLX K031 Teal Gel Coat	Styrene	10.4	25.00%	1488.000	222.5	993.24	181.27	80%	8820.05
	Methyl Methacrylate	10.4	10.00%	1488.000	150	267.84	48.88	80%	
Total VOC/HAP and PM from Gel Coat Use							3552.33	100169.16	
Worst Case VOC/HAP and PM							621.11	10457.94	

* Open Molding Operations include the following: manual application, mechanical application, gel coat application, and filament application.

METHODOLOGY

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

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

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

**Appendix A: Emissions Calculations
Reinforced Plastics and Composites
Open Molding Operations*
Resin Usage - General Lamination Flowcoating**

Company Name: Godfrey Conveyor Company, Inc., dba Godfrey Marine
Address City IN Zip: 4500 Middlebury Street, Elkhart, IN 46516
Permit: T039-19656-00267
Pit ID: 039-00267
Reviewer: Stephanie Wilkerson
Date: August 9, 2007

Material (Resin or Gel Name)	Monomer	Density (Lb/Gal)	Weight % Monomer	Maximum usage (lb/hour)	UEF (lbs monomer/ton resin or gel)	Potential VOC/HAP (pounds per day)	Potential VOC/HAP (tons per year)	Transfer Efficiency	Potential PM (tons/ year)
Aropol Production Resin	Styrene	9.0	32.70%	6825.000	69.978	1874.10	342.02	100%	0.00
AME 1000	Styrene	9.0	34.60%	6825.000	77	2181.98	398.21	100%	0.00
Total VOC/HAP and PM from Resin Use							740.23		0.00
Worst Case VOC/HAP							398.21		

* Open Molding Operations include the following: manual application, mechanical application, gel coat application, and filament application.

METHODOLOGY

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

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

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

Appendix A: Emissions Calculations
Form DD: Reinforced Plastics and Composites
Open Molding Operations*
Gel Coat Usage - Bilge Coating

Company Name: Godfrey Conveyor Company, Inc., dba Godfrey Marine
Address City IN Zip: 4500 Middlebury Street, Elkhart, IN 46516
Permit: T039-19656-00267
Plt ID: 039-00267
Reviewer: Stephanie Wilkerson
Date: October 1, 2007

Material (Resin or Gel Name)	Monomer	Density (Lb/Gal)	Weight % Monomer	Maximum usage (lb/hour)	UEF (lbs monomer/ton resin or gel)	Potential VOC/HAP (pounds per day)	Potential VOC/HAP (tons per year)	Transfer Efficiency	Potential PM (tons/ year)
White Bilge Gel Coat	Styrene	11.1	30.00%	1488.000	267	1430.27	261.02	80%	8689.05
(Glacier White Interior)	Methyl Methacrylate	11.1	10.00%	1488.000	150	267.84	48.88	80%	
Total VOC/HAP and PM from Gel Coat Use							309.90		8689.05

* Open Molding Operations include the following: manual application, mechanical application, gel coat application, and filament application.

METHODOLOGY

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

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

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

Appendix A: Emissions Calculations
Form DD: Reinforced Plastics and Composites
Open Molding Operations*
Gel Usage - Mold Department

Company Name: Godfrey Conveyor Company, Inc., dba Godfrey Marine
Address City IN Zip: 4500 Middlebury Street, Elkhart, IN 46516
Permit: T039-19656-00267
Plt ID: 039-00267
Reviewer: Stephanie Wilkerson
Date: August 17, 2007

Material (Resin or Gel Name)	Monomer	Density (Lb/Gal)	Weight % Monomer	Maximum usage (lb/hour)	UEF (lb monomer/ton resin or gel)	Potential VOC/HAP (pounds per day)	Potential VOC/HAP (tons per year)	Transfer Efficiency	Potential PM (tons/ year)
Hurricane White Gel Coat	Styrene	8.3	27.00%	496.000	240.3	386.17	70.48	80%	2524.42
	Methyl Methacrylate	8.3	3.00%	496.000	45	8.04	1.47		
Aropol Production Resin	Styrene	9.0	32.70%	525.000	69.978	144.16	26.31	100%	0.00
AME 1000	Styrene	9.0	34.60%	525.000	77	167.84	30.63	100%	0.00
Total VOC/HAP and PM from Gel Coat Use							128.88	2524.42	

* Open Molding Operations include the following: manual application, mechanical application, gel coat application, and filament application.

METHODOLOGY

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

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

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

**Appendix A: Emissions Calculations
Reinforced Plastics and Composites
Open Molding Operations*
Limited Gel Coat Usage - General Lamination Gel Coat Booths**

Company Name: Godfrey Conveyor Company, Inc., dba Godfrey Marine
Address City IN Zip: 4500 Middlebury Street, Elkhart, IN 46516
Permit: T039-19656-00267
Plt ID: 039-00267
Reviewer: Stephanie Wilkerson
Date: October 3, 2007

Material (Resin or Gel Name)	Monomer	Density (Lb/Gal)	Weight % Monomer	Limited usage (lb/hour)	UEF (lbs monomer/ton resin or gel)	Potential VOC/HAP (pounds per day)	Potential VOC/HAP (tons per year)	Transfer Efficiency	Potential PM (tons/ year)
Black Neo Gel Coat	Styrene	9.5	40.00%	260.000	439	547.87	99.99	80%	1193.80
	Methyl Methacrylate	9.5	5.00%	260.000	75	11.70	2.14	80%	
97 Blue Gel Coat	Styrene	10.3	25.00%	260.000	222.5	173.55	31.67	80%	1518.93
	Methyl Methacrylate	10.3	10.00%	260.000	150	46.80	8.54	80%	
French Vanilla Armorflex	Styrene	11.1	21.35%	260.000	190.015	126.56	23.10	80%	1827.33
	Methyl Methacrylate	11.1	6.15%	260.000	90	17.26	3.15	80%	
Hurricane White Gel Coat	Styrene	8.3	27.00%	260.000	240.3	202.43	36.94	80%	1323.29
	Methyl Methacrylate	8.3	3.00%	260.000	45	4.21	0.77	80%	
Rodeo Red Gel Coat	Styrene	10.2	30.00%	260.000	267	249.91	45.61	80%	1387.06
	Methyl Methacrylate	10.2	10.00%	260.000	150	46.80	8.54	80%	
Seagrass Gel Coat	Styrene	9.9	34.67%	260.000	336	363.49	66.34	80%	1387.15
	Methyl Methacrylate	9.9	3.81%	260.000	60	7.13	1.30	80%	
Silver Blue Gel Coat	Styrene	10.3	24.61%	260.000	219.029	168.15	30.69	80%	1610.62
	Methyl Methacrylate	10.3	6.87%	260.000	105	22.51	4.11	80%	
Suede Gel Coat	Styrene	10.2	35.00%	260.000	336	366.91	66.96	80%	1393.89
	Methyl Methacrylate	10.2	5.00%	260.000	75	11.70	2.14	80%	
HF Yellow Gel Coat	Styrene	10.2	30.00%	260.000	267	249.91	45.61	80%	1391.16
	Methyl Methacrylate	10.2	10.00%	260.000	150	46.80	8.54	80%	
White Bilge Gel Coat (Glacier White Interior)	Styrene	11.1	30.00%	260.000	267	249.91	45.61	80%	1518.25
	Methyl Methacrylate	11.1	10.00%	260.000	150	46.80	8.54	80%	
HI-FLX Ruby Red Gel Coat	Styrene	10.1	30.00%	260.000	267	249.91	45.61	80%	1385.69
	Methyl Methacrylate	10.1	10.00%	260.000	150	46.80	8.54	80%	
HI-FLX Vapor Blue X Gel Coat	Styrene	10.4	25.00%	260.000	222.5	173.55	31.67	80%	1542.62
	Methyl Methacrylate	10.4	10.00%	260.000	150	46.80	8.54	80%	
HI-FLX K031 Teal Gel Coat	Styrene	10.4	25.00%	260.000	222.5	173.55	31.67	80%	1541.14
	Methyl Methacrylate	10.4	10.00%	260.000	150	46.80	8.54	80%	
Total VOC/HAP and PM from Gel Coat Use						674.85	19020.92		
Worst Case VOC/HAP and PM						108.53	1827.33		
PM Emissions After Controls							91.37		

* Open Molding Operations include the following: manual application, mechanical application, gel coat application, and filament application.
**Permit requirement of minimum control efficiency of 95% for the dry filters on fiberglass production operations.

METHODOLOGY

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

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

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

PM Emissions After Controls (tons/year) = Potential PM (tons/year) * (1-.95)

Appendix A: Emissions Calculations
Form DD: Reinforced Plastics and Composites
Open Molding Operations*
Resin Usage - Emission Unit Chop6 Flowcoating

Company Name: Godfrey Conveyor Company, Inc., dba Godfrey Marine
Address City IN Zip: 4500 Middlebury Street, Elkhart, IN 46516
Permit: T039-19656-00267
Plt ID: 039-00267
Reviewer: Stephanie Wilkerson
Date: August 9, 2007

Material (Resin or Gel Name)	Monomer	Density (Lb/Gal)	Weight % Monomer	Maximum usage (lb/hour)	UEF (lbs monomer/ton resin or gel)	Potential VOC/HAP (pounds per day)	Potential VOC/HAP (tons per year)	Transfer Efficiency	Potential PM (tons/ year)
Aropol Production Resin	Styrene	9.0	32.70%	1900.000	69.978	521.73	95.22	100%	0.00
AME 1000	Styrene	9.0	34.60%	1900.000	77	607.44	110.86	100%	0.00
Total VOC/HAP and PM from Resin Use							206.07		0.00
Worst Case VOC/HAP							110.86		

* Open Molding Operations include the following: manual application, mechanical application, gel coat application, and filament application.

METHODOLOGY

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

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

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

**Appendix A: Emissions Calculations
Reinforced Plastics and Composites
Open Molding Operations*
Limited Gel Coat Usage - Bilge Coating**

Company Name: Godfrey Conveyor Company, Inc., dba Godfrey Marine
Address City IN Zip: 4500 Middlebury Street, Elkhart, IN 46516
Permit: T039-19656-00267
Pit ID: 039-00267
Reviewer: Stephanie Wilkerson
Date: October 1, 2007

Material (Resin or Gel Name)	Monomer	Density (Lb/Gal)	Weight % Monomer	Limited usage (lb/hour)	UEF (lbs monomer/ton resin or gel)	Potential VOC/HAP (pounds per day)	Potential VOC/HAP (tons per year)	Transfer Efficiency	Potential PM (tons/ year)
White Bilge Gel Coat	Styrene	11.1	30.00%	71.750	267	68.97	12.59	80%	418.98
(Glacier White Interior)	Methyl Methacrylate	11.1	10.00%	71.750	150	12.92	2.36	80%	
Total VOC/HAP and PM from Gel Coat Use							14.94		418.98
PM Emissions After Controls									20.95

* Open Molding Operations include the following: manual application, mechanical application, gel coat application, and filament application.
**Permit requirement of minimum control efficiency of 95% for the dry filters on fiberglass production operations.

METHODOLOGY

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

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

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

PM Emissions After Controls (tons/year) = Potential PM (tons/year) * (1-.95)

**Appendix A: Emissions Calculations
Reinforced Plastics and Composites
Open Molding Operations*
Limited Gel and Resin Usage - Mold Department**

Company Name: Godfrey Conveyor Company, Inc., dba Godfrey Marine
Address City IN Zip: 4500 Middlebury Street, Elkhart, IN 46516
Permit: T039-19656-00267
Pit ID: 039-00267
Reviewer: Stephanie Wilkerson
Date: October 3, 2007

Material (Resin or Gel Name)	Monomer	Density (Lb/Gal)	Weight % Monomer	Limited usage (lb/hour)	UEF (lb monomer/ton resin or gel)	Potential VOC/HAP (pounds per day)	Potential VOC/HAP (tons per year)	Transfer Efficiency	Potential PM (tons/ year)
Hurricane White Gel Coat	Styrene	8.3	27.00%	38,500	240.3	29.98	5.47	80%	195.95
	Methyl Methacrylate	8.3	3.00%	38,500	45	0.62	0.11		
Aropol Production Resin	Styrene	9.0	32.70%	40,000	69.978	10.88	2.00	100%	0.00
AME 1000	Styrene	9.0	34.60%	40,000	77	12.79	2.33	100%	0.00
Total VOC/HAP and PM from Gel Coat Use							9.92	195.95	
PM Emissions After Controls**								9.80	

* Open Molding Operations include the following: manual application, mechanical application, gel coat application, and filament application.
**Permit requirement of minimum control efficiency of 95% for the dry filters on fiberglass production operations.

METHODOLOGY

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

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

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

PM Emissions After Controls (tons/year) = Potential PM (tons/year) * (1-.95)

Appendix A: Emissions Calculations

Emissions Summary

Company Name: Godfrey Conveyor Company, Inc., dba Godfrey Marine

Address City IN Zip: 4500 Middlebury Street, Elkhart, IN 46516

Permit: T039-19656-00267

Pit ID: 039-00267

Reviewer: Stephanie Wilkerson

Date: October 3, 2007

Emission Unit	PM	PM10	SO2	VOC	CO	NOx	HAP-Styrene	HAP - Methyl Methacrylate	All HAPs
Gen. Lamination - Flowcoating Worst Case	Negligible	Negligible	-	398.21	-	-	398.21	-	398.21
Bilge Coating	8689.05	8689.05	-	309.90	-	-	261.02	48.88	309.90
Gen. Lamination - Gel Coat Worst Case	10457.94	10457.94	-	621.11	-	-	572.23	48.88	621.11
Mold Department - Worst Case	2524.42	2524.42	-	71.95	-	-	70.48	1.47	71.95
Flange Grinding	61.80	61.80	-	-	-	-	-	-	-
Woodworking	0.08	0.08	-	-	-	-	-	-	-
Insignificant Activities	3.85	3.95	0.00	28.23	1.10	1.30	4.79	0.00	4.88
Uncontrolled Total	21737.14	21737.24	0.00	1031.19	1.10	1.30	908.52	99.23	1007.84

Emission Unit	PM	PM10	SO2	VOC	CO	NOx	All HAPs		
Bilge Coating	20.95	20.95	-	<15	-	-	<15		
Gen. Lamination - Flowcoating	Negligible	Negligible	-	<220	-	-	<220		
Gen. Lamination - Gel Coat	91.37	91.37	-	-	-	-	<10		
Mold Department	9.80	9.80	-	<10	-	-	-	-	-
Flange Grinding	3.09	3.09	-	-	-	-	-	-	-
Woodworking	0.08	0.08	-	-	-	-	-	-	-
Insignificant Activities	3.85	3.95	0.00	<5	1.10	1.30	<5		
Limited Total	129.14	129.24	0.00	<250	1.10	1.30	<250		

Insignificant Activities

Emission Unit	PM	PM10	SO2	VOC	CO	NOx	HAP-Styrene	HAP - Methyl Methacrylate	All HAPs
Surface Coating	3.17	3.17	-	7.72	-	-	-	-	-
Welding	0.68	0.68	-	-	-	-	-	-	0.06
Gen. Lamination - Mold Release	-	-	-	9.92	-	-	-	-	-
Natural Gas Combustion Units	0.00	0.10	0.00	0.10	1.10	1.30	-	-	0.03
Plant 2	-	-	-	10.49	-	-	4.79	-	4.79
Uncontrolled Total	3.85	3.95	0.00	28.23	1.10	1.30	4.79	0.00	4.88

All values are in tons per year.