



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant
DATE: February 1, 2005
RE: Master Spas, Inc. / MSM 003-19919-00249
FROM: Paul Dubenetzky
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 13-17-3-4 and 326 IAC 2, this approval 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 13-15-7-3 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 Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures
FNPER-MOD.dot 1/10/05



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

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February 1, 2005

Mr. Terry Valmassoi
Master Spas, Inc.
6927 Lincoln Parkway
Fort Wayne, IN 46801

Re: 003-19919-00249
Minor Source Modification to:
Part 70 permit No.: T003-9073-00249

Dear Mr. Valmassoi:

Master Spas, Inc., located at 6927 Lincoln Parkway, Fort Wayne, IN 46801, was issued a Part 70 operating permit T003-9073-00249 on May 16, 2001 for a fiberglass reinforced spa manufacturing source. An application to modify the source was received on November 29, 2004. Pursuant to 326 IAC 2-7-10.5 the following emission units are approved for construction at the source:

- (a) One (1) Fiberglass Chop Booth, known as S18, equipped with a dry filters for particulate control and a 9,800 cubic feet per minute (cfm) exhaust fan.
- (b) Insignificant Activity: Fiberglass hole cutting operation, equipped with 4 individual 3000 cfm Micro Air dust collectors, each with design grain loading of 0.000777 grains per actual cubic foot.

The following construction conditions are applicable to the proposed project:

General Construction Conditions

1. The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).
2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.
3. Effective Date of the Permit
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.
4. Pursuant to 326 IAC 2-1.1-9 and 326 IAC 2-7-10.5(i), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.
6. Pursuant to 326 IAC 2-7-10.5(l) the emission units constructed under this approval shall not be placed into operation prior to revision of the source's Part 70 Operating Permit to incorporate the required operation conditions.

The source may begin construction when the minor source modification has been issued. Operating conditions shall be incorporated into the Part 70 operating permit as a minor permit modification in accordance with 326 IAC 2-7-10.5(l)(2) and 326 IAC 2-7-12.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter call (800) 451-6027, press 0 and ask for Aida De Guzman or extension (3-4972), or dial (317) 233-4972.

Sincerely,

Original signed by
Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments
APD

cc: File - Allen County
Allen County Health Department
Air Compliance Section Inspector – Patrick Burton
Compliance Data Section
Administrative and Development



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**MINOR SOURCE MODIFICATION TO a PART 70
SOURCE
OFFICE OF AIR QUALITY**

**Master Spas, Inc.
6927 Lincoln Parkway
Fort Wayne, Indiana 46804**

(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.

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.

Minor Source Modification No.: 003-19919-00249	
Issued by: Original signed by Paul Dubenetzky, Chief Permit Branch Office of Air Quality	Issuance Date: February 1, 2005

SECTION D.1 FACILITY OPERATION CONDITIONS

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

- (a) One (1) Fiberglass Chop Booth, known as S18, equipped with a dry filters for particulate control and a 9,800 cubic feet per minute (cfm) exhaust fan.

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

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

D.1.1 Particulate Matter (PM) [326 IAC 6-3-2(c)] [40 CFR 52, Subpart P]

- (a) Pursuant to 40 CFR 52, Subpart P, the particulate matter emission from the new Fiberglass Chop Booth (S18) shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

D.1.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

D.1.3 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC limit specified in Condition No.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.4 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3 (PM emission Limitations for Manufacturing Processes), the new Fiberglass Chop Booth (S18) shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

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

D.1.5 Record Keeping Requirements and Reporting Requirements

There are no record keeping and reporting required for this modification.

**Indiana Department of Environmental Management
Office of Air Quality**

**Technical Support Document (TSD) for a Part 70 Minor Source
Modification and Minor Permit Modification**

Source Background and Description

Source Name:	Master Spas, Inc.
Source Location:	6927 Lincoln Parkway, Fort Wayne, Indiana 46804
County:	Allen
SIC Code:	3083
Operation Permit No.:	T003-9073-00249
Operation Permit Issuance Date:	May 16, 2001
Minor Source Modification No.:	003-19919-00249
Minor Permit Modification No.:	003- 19975-00249
Permit Reviewer:	Aida De Guzman

The Office of Air Quality (OAQ) has reviewed a modification application for Master Spas, Inc. relating to the change in the method for calculating emissions from the spas being manufactured from 3.75 spas per hour to 4.033 units per hour (where a unit is 100 lbs of resin). This change is not an increase in production but rather 3.75 spas an hour was a wrong assumption, since the Polyester Resin usage for 3.75 spas an hour will use the same amount of Polyester Resin for 4.033 units.

This modification includes the installation of the following additional emission units:

- (a) One (1) Fiberglass Chop Booth, known as S18, equipped with dry filters for particulate control and a 9,800 cubic feet per minute (cfm) exhaust fan.
- (b) Insignificant Activity: Fiberglass hole cutting operation, equipped with 4 individual 3000 cfm Micro Air dust collectors, each with design grain loading of 0.000777 grains per actual cubic foot.

History

On November 29, 2004, Master Spas, Inc. submitted an application to the OAQ requesting to add additional chop booth to their existing fiberglass operation. Master Spas, Inc. was issued a Part 70 permit on May 16, 2001.

The change in the spas production and the addition of the chop booth will not change the maximum amount of Polyester Resin usage.

Currently, Master Spas is permitted for two fiberglass chop booths. Vinylester Resin is first applied to the spa shell/mold as a barrier coat in one of the booths. Polyester Resin is then applied in a ¼ inch thick layer to the spa shell/mold in the second booth. The proposed chop booth will allow the Polyester Resin to be applied in a second and third booths consecutively in two thinner 1/8 inch layers.

Recommendation

The staff recommends to the Commissioner that the Part 70 Minor Source Modification and Minor Permit Modification 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 November 29, 2004.

Emission Calculations

(a) For Major NSR Determination:

The source is an existing major source under the Nonattainment NSR, limited in the Part 70 permit to 132.0 tons of VOC per year. The source has submitted the following data for the modification:

Projected actual VOC emissions after modification - 89.586 tons per year
 Average baseline actual VOC emissions - 49.686 tons per year
 Net Emissions Increase - 39.9 tons/year

The modification is therefore not major under 326 IAC 2-3, as 39.9 tons/year is less than the 40 tons per year significant threshold.

(b) For Permitting Level Determination:

(1) New Fiberglass Chop Booth:

(A) Polyester Resin (Styrene) Emissions - The change in the spas production and the addition of the chop booth will not change the maximum amount of Polyester Resin usage. Therefore, no increase in the styrene emissions occur.

(B) Clean-up Solvents Emissions

Material	Density (lb/gal)	Weight % VOC	Flash Off	Usage (gal/hour)	PTE (tons/year)
Acetone	Not a VOC				
280 Super Flash	8.86	100	100 %	0.488	18.94
Super Blue	8.91	6.3	100%	0.192	0.47
TOTAL					19.40

Methodology:
 Emissions, tons/yr = density, lb/gal * wt. % VOC * Flash off * usage, gal/hr * 8760 hrs/yr * ton /2000 lb

Potential To Emit of Modification

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

This table reflects the PTE before controls. Control equipment is not considered federally

enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	0.0
PM-10	0.0
SO ₂	0.0
VOC	19.40
CO	0.0
NO _x	0.0

Justification for Modification

- (a) The Part 70 Operating permit is being modified through a Part 70 Minor Source Modification, pursuant to 326 IAC 2-7-10.5(d), since the PTE of 19.4 tons of VOC per year is less than 25 tons per year, but greater than 10 tons per year.
- (b) The Part 70 Operating Permit is being modified through Part 70 Minor Permit Modification. This is performed pursuant to 326 IAC 2-7-12, since it is not required to be processed as a significant permit modification.

County Attainment Status

The source is located in Allen County.

Pollutant	Status
PM-10	Attainment
SO ₂	Attainment
NO ₂	Attainment
1-Hour Ozone	Attainment
8-Hour Ozone	Nonattainment
CO	Attainment
Lead	Not determined

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) 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 and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Allen County has been designated as nonattainment for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Nonattainment NSR.
- (b) Allen County has been classified as attainment or unclassifiable for all the other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

Source Status

Existing Source PSD or Emission Offset Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity):

Pollutant	Emissions (tons/year)
PM	4.78
PM-10	4.78
SO ₂	0.02
VOC	203.5
CO	0.85
NO _x	4.00

- (a) This existing source is an existing major stationary source because VOC is emitted at a rate of 100 tons per year or more, and it is not one of the 28 listed source categories.

Potential to Emit of Modification After Issuance Reflecting Major PSD or NA NSR Applicability

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 source modification.

Process/facility	Potential to Emit (tons/year)						
	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Modification (New Chop Booth)	0.0	0.0	0.0	39.9	0.0	0.0	0.0
Emissions Offset Significant Levels	-	-	-	40	-	100	-
PSD Significant Levels	25	15	40	-	40	-	-

- (a) The source is an existing major source under the Nonattainment NSR, since the PTE for VOC is greater than 100 tons per year.
- (b) The Permittee has provided the following information as part of the application for this approval that is based on Actual to Projected Actual test in (326 IAC 2-3-2) this modification at a major stationary source. The modification is not subject to major NSR review under 326 IAC 2-3-1 as the net actual emission increase is less than the significant threshold of 40 tons per year. IDEM, OAQ has not reviewed this information and will not be making any determination in this regard as part of this approval. The applicant will be required to keep records for five (5) years and report in accordance with source obligation in 326 IAC 2-2-8 and applicability in 326 IAC 2-3-2:

Projected actual VOC emissions after modification -	89.586 tons per year
Average baseline actual VOC emissions -	<u>49.686 tons per year</u>
Net Actual Emissions Increase -	39.9 tons/year

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) included in this proposed modification.
- (b) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Wood Furniture Manufacturing Operations, 326 IAC 14, (40 CFR 63.800, Subpart JJ), because OAQ has determined that spas are appliances and not wood furniture. This determination was reflected in the issued Part 70 Permit T003-9073-00249, issued on May 16, 2001.
- (c) This source is subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Reinforced Plastic Composites production, 326 IAC 14, (40 CFR 63, Subpart WWWW).

The reinforced plastic composites production operations are subject to the National Emission Standards for Hazardous Air Pollutants for Reinforced Plastic Composites Production, 40 CFR 63, Subpart WWWW. A copy of the MACT is currently available on the U.S. EPA website, <http://www.epa.gov/ttn/atw/rpc/rpcpg.html>.

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

This rule has a future compliance date; therefore, the specific details of the rule and how the Permittee will demonstrate compliance are not provided in the permit. The Permittee shall submit an application for a significant permit modification nine months prior to the compliance date for the MACT, April 21, 2006, that will specify the option or options for the emission limitations and standards and methods for determining compliance chosen by the Permittee. At that time, IDEM, OAQ will include the specific details of the rule and how the Permittee will demonstrate compliance. In addition, pursuant to 40 CFR 63, Subpart WWWW, the Permittee shall submit:

- (1) An Initial Notification containing the information specified in 40 CFR 63.9(b)(2) no later than August 19, 2003.
- (2) If complying with organic HAP emissions limit averaging provisions, the Permittee shall submit a Notification of Compliance Status, containing the information specified in 40 CFR 63.9(h), no later than May 21, 2007.
- (3) If complying with organic HAP content limits, application equipment requirements, or organic HAP emissions limit other than organic HAP emissions limit averaging, the Permittee shall submit a Notification of Compliance Status, containing the information specified in 40 CFR 63.9(h), no later than May 21, 2006.
- (4) If complying by using an add-on control device, the Permittee shall submit:
 - (A) A notification of intent to conduct a performance test as specified in 40 CFR 63.9(e), at least 60 calendar days before the performance test is scheduled to begin.
 - (B) A notification of the date for the CMS performance evaluation, if required, as specified in 40 CFR 63.9(g), by the date of submission of the notification of intent to conduct a performance test.

- (C) A Notification of Compliance Status as specified in 40 CFR 63.9(h), no later than 60 calendar days after the completion of the add-on control device performance test and CMS performance evaluation.

No detailed requirements from this rule will be included in this modification.

- (c) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this proposed modification.

State Rule Applicability – Entire Source

- (a) 326 IAC 2-3
The source is an existing major source under the Nonattainment NSR, since the source wide PTE for VOC is greater than 100 tons per year, and it is not one of the 28 listed sources.
- (b) 326 IAC 5-1 (Opacity Limitations)
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
- (1) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (2) 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

- (a) 326 IAC 8-1-6 (General Reduction Requirements)
This rule applies to new facilities as of January 1, 1980, which have potential VOC emissions of 25 tons per year, located anywhere in the state which are not otherwise regulated by other provisions in this article 326 IAC 8.
- The new Fiberglass Chop Booth (S18) by itself is not a facility, since it will be used in the existing facility or production line. Since it is part of the production line the BACT already determined for the existing chop booths will also be applicable for this chop booth. The BACT in the Part 70 permit for these chop booths is still the BACT of today.
- (b) 326 IAC 6-3 (PM emission Limitations for Manufacturing Processes)
- (1) The new Fiberglass Chop Booth (S18) is subject to 326 IAC 6-3, which requires that this booth be controlled by a dry particulate filter, waterwash, or an equivalent control device, subject to the following:
- (A) The source shall operate the control device in accordance with manufacturer's specifications.
- (2) The equation under 40 CFR 52, Subpart P was also applied for the new Fiberglass Chop Booth (S18). Pursuant to 40 CFR 52, Subpart P, the particulate matter emission from the new Fiberglass Chop Booth (S18) shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

- (3) 326 IAC 6-3 is not applicable to the fiberglass hole cutting operation, as it is a trivial or insignificant activity.
- (c) 326 IAC 20-25 (Emissions from Reinforced Plastic Composites Fabricating Emission Units)
The new Fiberglass Chop Booth (S18) will not increase the HAPs already emitted by the source, and therefore, by itself will not trigger 326 IAC 20-25. The source, however, will be subject to this rule, as it is a major source of HAPs emissions. No detailed requirements from this rule will be included in this modification.

Changes to the Part 70 Permit

The Part 70 Permit will be modified to incorporate the new Fiberglass Chop Booth (S18) and its applicable requirements (additions are **bolded** and deletions are ~~struck through~~ for emphasis):

The source requested that the Insignificant Activities Listing in the TSD of the Part 70 permit be revised as follows:

- (k) Two (2) urethane foam (A/B) air gun booths, known as ~~S3~~ **GE2** and S16, total capacity: 300 pounds of foam per hour, with emissions of less than 1.0 ton per year of a single HAP.
- (l) **Fiberglass hole cutting operation, equipped with 4 individual 3000 cfm Micro Air dust collectors, each with design grain loading of 0.000777 grains per actual cubic foot.**

The following are the changes to the Part 70 permit:

~~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) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:~~

~~(1) Indicate estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);~~

~~(2) Indicate estimated actual emissions of other regulated pollutants (as defined by 326 IAC 2-7-1) from the source, for purposes of Part 70 fee assessment.~~

- ~~(b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:~~

~~Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015~~

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

- ~~(c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private~~

shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

C.17 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,
Indianapolis, Indiana 46204

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] [326 IAC 2-2] [326 IAC 2-3]

- (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) If there is a reasonable possibility that a “project” (as defined in 326 IAC 2-2-1 (qq) and 326 IAC 2-3-1 (II) at an existing emissions unit, other than projects at a Clean Unit, which is not part of a “major modification” (as defined in 326 IAC 2-2-1 (ee) and 326 IAC 2-3-1 (z) may result in significant emissions increase and the Permittee elects to utilize the “projected actual emissions” (as defined in 326 IAC 2-2-1 (rr) and 326 IAC 2-3-1 (mm), the Permittee shall comply with following:
- (1) Prior to commencing the construction of the “project” (as defined in 326 IAC 2-2-1 (qq) and 326 IAC 2-3-1 (II) at an existing emissions unit, document and maintain the following records:

- (A) **A description of the project.**
 - (B) **Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.**
 - (C) **A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:**
 - (i) **Baseline actual emissions;**
 - (ii) **Projected actual emissions;**
 - (iii) **Amount of emissions excluded under section 326 IAC 2-2-1(rr)(2)(A)(iii) and/or 326 IAC 2-3-1(mm)(2)(A)(3); and**
 - (iv) **An explanation for why the amount was excluded, and any netting calculations, if applicable.**
- (2) **Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emissions unit identified in (1)(B) above; and**
- (3) **Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.**

C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] **[326 IAC 2-2] [326 IAC 2-3]**

- (a) The ~~source~~ **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, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (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, any quarterly or semi-annual reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. ~~The report does~~ **All reports do** require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. 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.

- (f) **If the Permittee is required to comply with the recordkeeping provisions of (c) in Section C- General Record Keeping Requirements for any “project” (as defined in 326 IAC 2-2-1 (qq) and/or 326 IAC 2-3-1 (ll) at an existing emissions unit and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ:**
- (1) **The annual emissions, in tons per year, from the project identified in (c)(1) in Section C- General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-2-1 (xx) and 326 IAC 2-3-1 (qq) for that regulated NSR pollutant, and**
 - (2) **The emissions differ from the preconstruction projection as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(ii).**
- (g) **The report for project at an existing emissions unit shall be submitted within sixty (60) days after the end of the year and contain the following:**
- (1) **The name, address, and telephone number of the major stationary source.**
 - (2) **The annual emissions calculated in accordance with (c)(2) and (3) in Section C- General Record Keeping Requirements.**
 - (3) **The emissions calculated under the actual-to-projected actual test stated in 326 IAC 2-2-2(d)(3) and/or 326 IAC 2-3-2(c)(3).**
 - (4) **Any other information that the Permittee deems fit to include in this report,**
- Reports required in this part shall be submitted to:**
- Indiana Department of Environmental Management
Air Compliance Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015**
- (h) **The Permittee shall make the information required to be documented and maintained in accordance with (c) in Section C- General Record Keeping Requirements available for review upon a request for inspection by IDEM, OAQ. The general public may request this information from the IDEM, OAQ under 326 IAC 17.1.**

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 reinforced plastic spas manufacturing source.

Responsible Official: Terry Valmassoi

Source Address: 6927 Lincoln Parkway, Fort Wayne, Indiana 46804
Mailing Address: 6927 Lincoln Parkway, Fort Wayne, Indiana 46804
Phone Number: 219 - 436 - 9100
SIC Code: 3083
County Location: Allen
Source Location Status: **Non Attainment for 8-hour Ozone**
Attainment for all **the other** criteria pollutants
Source Status: Part 70 Permit Program
~~Minor~~ **Major** Source, under PSD Rules;
Major for Nonattainment New Source Review
Major Source, Section 112 of the Clean Air Act

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

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

- (a) Two (2) fiberglass chop booths, permitted in 1996, known as S5 and S15, each equipped with dry filters for particulate control, (including cleanup solvents), S5 equipped with a 9,800 cfm exhaust fan and S15 equipped with a 10,800 cfm exhaust fan, total capacity: ~~3.75 spas~~ 4.033 units per hour.
- (b) One (1) fiberglass operation for hand lay application of resins, permitted in 1996, capacity: ~~3.75 spas~~ 4.033 units per hour.
- (c) **One (1) Fiberglass Chop Booth, known as S18, equipped with dry filters for particulate control and a 9,800 cubic feet per minute (cfm) exhaust fan.**
- (e)(d) One (1) surface coating operation for airless spray application of water based coatings to woodskirting of spas, permitted in 1996, capacity: ~~3.75 spas~~ 4.033 units per hour.

SECTION D.1

FACILITY OPERATION CONDITIONS

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

- (a) Two (2) fiberglass chop booths, permitted in 1996, known as S5 and S15, each equipped with dry filters for particulate control, (including cleanup solvents), S5 equipped with a 9,800 cfm exhaust fan and S15 equipped with a 10,800 cfm exhaust fan, total capacity: ~~3.75 spas~~ 4.033 units per hour.
- (b) One (1) fiberglass operation for hand lay application of resins, permitted in 1996, capacity: ~~3.75 spas~~ 4.033 units per hour.
- (c) **One (1) Fiberglass Chop Booth, known as S18, equipped with dry filters for particulate control and a 9,800 cubic feet per minute (cfm) exhaust fan.**
- (e)(d) One (1) surface coating operation for airless spray application of water based coatings to woodskirting of spas, permitted in 1996, capacity: ~~3.75 spas~~ 4.033 units per hour.

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

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

D.1.1 No change

D.1.2 No change

D.1.3 Particulate Matter (PM) [326 IAC 6-3-2] [40 CFR 52, Subpart P]

- (a) Pursuant to 326 IAC 6-3-2, the PM from the chop booths, known as S5 and S15, and the wood spa skirting surface coating operation, shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

- (b) Pursuant to 40 CFR 52, Subpart P, the particulate matter emission from the new Fiberglass Chop Booth (S18) shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

Compliance Determination Requirements

D.1.4 No change

D.1.5 No change

D.1.6 No change

D.1.7 Particulate Matter (PM)

- (a) In order to comply with Condition D.1.3, the dry filters for PM control shall be in operation at all times when the fiberglass chop booths are in operation.
- (b) Pursuant to 326 IAC 6-3-2, the new Fiberglass Chop Booth (S18) shall be controlled by a dry filter, waterwash, or an equivalent control device, and the owner or operator shall operate the control device in accordance with manufacturer's specifications.

D.1.8 No change

D.1.9 No change

D.1.10 No change

Compliance Requirements

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

Compliance Determination Requirements in Section D of the permit are those conditions that are

found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also 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.

There are no changes to the source current compliance requirements.

Conclusion

The construction of this proposed modification shall be subject to the conditions of the attached **Minor Source Modification No.: 003 19919-00249 and Minor Permit Modification No.: 003-19975.**