



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: January 13, 2005
RE: Fort Wayne Pools, Inc. / 003-19985-00071
FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision – Approval

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

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

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

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

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

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

Enclosures
FNPER-AM.dot 1/10/05



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

Mitchell E. Daniels, Jr.
Governor

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Commissioner

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January 13, 2005

Mr. Steve Feipel
Fort Wayne Pools, Inc.
6930 Gettysburg Pike
Fort Wayne, IN 46804

Re: 003-19985-00071
First Administrative Amendment to
Part 70 Permit 003-6933-00071

Dear Mr. Feipel:

Fort Wayne Pools, Inc. was issued a Part 70 operation permit on December 4, 2002 for a stationary fiberglass reinforced plastic pool steps, filler panels and pool supports manufacturing plant located at 6930 Gettysburg Pike, Fort Wayne, IN 46804. A letter requesting a change to the permit was received on December 15, 2004. The source requested that permit be updated to change the source and facility descriptions, to add an insignificant activity for a foam application spray booth, and to update the Condition C.17 Emission Statement requirement. These requests are explained below:

- (a) The source requested that Conditions A.1, A.2(a), A.3(a), A.3(k), D.1(a), and D.1.1(b) be updated to more accurately describe the products resulting from its operations. In Condition A.1, "stationary fiberglass reinforced plastic pool steps, filler panels, and pool supports manufacturing plant" should be changed to "stationary fiberglass reinforced product manufacturing plant." In Conditions A.2(a), A.3(a), A.3(k), D.1(a), and D.1.1(b), "pool steps and filler panels", "pool steps", and "steps" should be changed to "fiberglass reinforced products." These changes to the permit each qualify as a "revision to descriptive information where the revision will not trigger a new applicable requirement or violate a permit term," under 326 IAC 2-7-11, Administrative Permit Amendments.
- (b) The source requested that one (1) spray booth for application of urethane foam, with a maximum throughput of 600 spas per year at 142 pounds of foam per spa, utilizing one (1) air spray gun, designated at EU-14, and exhausting to stack S-14, be added to permit Section A.3, Specifically Regulated Insignificant Activities, since the potential uncontrolled emissions meet the exemption levels specified in 326 IAC 2-1.1-3(e)(1) or 326 IAC 2-7-1(21)(A), whichever is lower.

During the spray application process at the source, the urethane foam is produced by mixing component A (Polymethylene Polyphenylisocyanate FE 80 A-D) and component B (Urethane System Resin Component FE 117-M). Based on the information provided by the source, which is supported by the Alliance for the Polyurethanes Industry (API) guidance document entitled "MDI/Polymeric MDI Emissions Reporting Guidelines for the Polyurethane Industry", the components react quickly, with less than 2% by weight of the component mixture potentially emitted as volatiles. The source estimates that the spray booth has uncontrolled potential emissions of methylene diphenyl diisocyanate (MDI) of 0.32 tons per year. MDI is both a hazardous air pollutant (HAP) and volatile organic compound (VOC). The inclusion of this emission unit in the permit qualifies as an "incorporation of an insignificant activity as defined in 326 IAC 2-7-1(21)," under 326 IAC 2-7-11, Administrative Permit Amendments.

- (c) The source requested that Condition C.17 Emission Statement be updated, based on the most recent revision to 326 IAC 2-6, to state that the due date for the Emission Statement is July 1, 2004 and once every 3 years thereafter (326 IAC 2-6-3(a)(2)). This change will be incorporated into the permit through an administrative amendment.

Pursuant to the provisions of 326 IAC 2-7-11, the permit is hereby administratively amended as follows with deleted language as ~~strikeouts~~ and new language **bolded**:

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 ~~product plastic pool steps, filler panels and pool supports~~ **product** manufacturing plant.

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) airless fiberglass resin chop spray booth and reinforcement areas, identified as EU-7, capable of processing 650 pounds of resin per hour and 7.5 pounds of vinyl ester resins per hour for producing ~~pool steps and filler panels~~ **fiberglass reinforced products**, equipped with an electric dry oven, using dry filters for overspray particulate matter control, and exhausting through one (1) stack, identified as S-7; and

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) one (1) grinding and machining operation, identified as EU-11, capable of processing 5.0 ~~steps fiberglass reinforced products~~ **fiberglass reinforced products** per hour ~~and filler panels~~, with particulate matter emissions controlled by a cyclone and dry filters system [326 IAC 6-3-2(c)];
- (k) application of foam packaging material, with a maximum usage of 195 gallons per year, to ~~pool steps fiberglass reinforced products~~ prior to shipment.
- (l) **one (1) spray booth for application of urethane foam, maximum throughput of 600 spas per year at 142 pounds of foam per spa, utilizing one (1) air spray gun, designated at EU-14, and exhausting to stack S-14**

SECTION D.1

FACILITY OPERATION CONDITIONS

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

- (a) one (1) airless fiberglass resin chop spray booth and reinforcement areas, identified as EU-7, capable of processing 650 pounds of resin per hour and 7.5 pounds of vinyl ester resins per hour for producing ~~pool steps and filler panels~~ **fiberglass reinforced products**, equipped with an electric dry oven, using dry filters for overspray particulate matter control, and exhausting through one (1) stack, identified as S-7; and
- (b) one (1) air atomization coping paint spray booth for pool trim, identified as EU-12, with a maximum coating material and accessory solvent usage rate of 2.21 pounds per hour, exhausting through one (1) stack, identified as S-12.

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

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

The resin chop spray booth shall be in compliance with 326 IAC 8-1-6 by operating with the following work practices, which is considered to be the Best Available Control Technology (BACT):

- (b) Resins and gel coats used, including filled resins and tooling resins and gel coats, shall be limited to maximum monomer contents of 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, controlled spraying, 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 % styrene 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.

Pursuant to CP003-4356-00071, the Best Available Control Technology (BACT) determined for the fiberglass fabrication operation at the source shall also include using vinylester resins as a barrier coat between the plexiglass acrylic sheets and the polyester resins when manufacturing ~~steps~~ **fiberglass reinforced products**.

Based on the information provided by the source in support of the BACT determination for CP003-4356-00071, the vinylester resins used as a barrier coat shall have a maximum styrene content of 47.5% and the polyester resins shall have a maximum styrene content 39% to achieve proper adhesion. The vinylester resins with up to 47.5% styrene content and the polyester resins with 39% styrene content used for manufacturing ~~steps~~ **fiberglass reinforced products** shall not be included in calculating the monomer content limits described in the preceding paragraphs.

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 annual emission statement covering the previous calendar year 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 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 ~~criteria~~ **all pollutants listed in 326 IAC 2-6-4(a) 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) **(32) (“Regulated pollutant, which is used only for purposes of Section 19 of this rule”)** 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).

- ~~(eb)~~ 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.

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

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Nathan Bell, at (800) 451-6027, press 0 and ask for Nathan Bell or extension (4-3350), or dial (317) 234-3350.

Sincerely,
Original signed by

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments
NCB

cc: File - Allen County
U.S. EPA, Region V
Allen County Health Department
Air Compliance Section Inspector - Patrick Burton
Compliance Data Section
Permit Tracking
Administrative and Development
Technical Support and Modeling - Michele Boner



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PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**Fort Wayne Pools, Inc.
 6930 Gettysburg Pike
 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.

Operation Permit No.: T003-6933-00071	
Issued by: Original signed by Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: December 4, 2002 Expiration Date: December 4, 2007
First Significant Permit Modification No.: 003-16985-00071	Issuance Date: February 2, 2004
First Administrative Amendment No.: 003-19985-00071	Pages Affected: 5, 6, 25, 28, 29
Issued by: Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: January 13, 2005

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 reinforced product manufacturing plant.

Responsible Official:	Tom Epple
Source Address:	6930 Gettysburg Pike, Fort Wayne, IN 46804
Mailing Address:	6930 Gettysburg Pike, Fort Wayne, IN 46804
General Source Phone Number:	260-432-8731
SIC Code:	3083
County Location:	Allen
County Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD Rules; Major Source, Section 112 of the Clean Air Act

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

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

- (a) one (1) airless fiberglass resin chop spray booth and reinforcement areas, identified as EU-7, capable of processing 650 pounds of resin per hour and 7.5 pounds of vinyl ester resins per hour for producing fiberglass reinforced products, equipped with an electric dry oven, using dry filters for overspray particulate matter control, and exhausting through one (1) stack, identified as S-7; and
- (b) one (1) air atomization coping paint spray booth for pool trim, identified as EU-12, with a maximum coating material and accessory solvent usage rate of 2.21 pounds per hour, exhausting through one (1) stack, identified as S-12.

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) one (1) grinding and machining operation, identified as EU-11, capable of processing 5.0 fiberglass reinforced products per hour, with particulate matter emissions controlled by a cyclone and dry filters system [326 IAC 6-3-2(c)];
- (b) one (1) natural gas fired air make-up unit, rated at 3.5 million British thermal units (mmBtu) per hour, exhausting through one (1) stack, identified as G-13;
- (c) one (1) natural gas fired air make-up unit, rated at 1.96 mmBtu per hour, exhausting through one (1) stack, identified as G-14;
- (d) twelve (12) natural gas fired space heaters, each rated at 0.4 mmBtu per hour, and each exhausting through one (1) stack, identified as G-1 through G-12;

- (e) one (1) welding booth for coping and pool supports, exhausting through one (1) stack, identified as S-13;
- (f) vessels (55 gallon drums) storing lubricating oils, hydraulic oils, machining oils, and machining fluids;
- (g) equipment relating to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment;
- (h) replacement of repair of electrostatic precipitators, bags in baghouse and filters in other air filtration equipment;
- (i) paved and unpaved roads and parking lots with public access [326 IAC 6-4];
- (j) usage of trichloroethylene (2.5 gallons per year) in the pool liner operation; and
- (k) application of foam packaging material, with a maximum usage of 195 gallons per year, to fiberglass reinforced products prior to shipment.
- (l) one (1) spray booth for application of urethane foam, maximum throughput of 600 spas per year at 142 pounds of foam per spa, utilizing one (1) air spray gun, designated at EU-14, and exhausting to stack S-14

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).

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 and 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 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 purposes 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, 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).

- (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.

SECTION D.1

FACILITY OPERATION CONDITIONS

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

- (a) one (1) airless fiberglass resin chop spray booth and reinforcement areas, identified as EU-7, capable of processing 650 pounds of resin per hour and 7.5 pounds of vinyl ester resins per hour for producing fiberglass reinforced products, equipped with an electric dry oven, using dry filters for overspray particulate matter control, and exhausting through one (1) stack, identified as S-7; and
- (b) one (1) air atomization coping paint spray booth for pool trim, identified as EU-12, with a maximum coating material and accessory solvent usage rate of 2.21 pounds per hour, exhausting through one (1) stack, identified as S-12.

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

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

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

The resin chop spray booth shall be in compliance with 326 IAC 8-1-6 by operating with the following work practices, which is considered to be the Best Available Control Technology (BACT):

- (a) Use of resins and gel coats shall be limited such that the potential to emit (PTE) volatile organic compounds (VOC) from resins and gel coats only shall be less than 100 tons per year, per twelve (12) consecutive months. Compliance with this limit shall be determined based upon the following criteria:
 - (1) Monthly usage by weight, monomer content, method of application, and other emission reduction techniques for each gel coat and resin shall be recorded. Volatile organic compounds (VOC) emissions shall be calculated by multiplying the usage of each gel coat and resin by the emission factor that is appropriate for the monomer content, method of application, and other emission reduction techniques for each gel coat and resin, and summing the emissions for all gel coats and resins. Emission factors shall be obtained from the reference approved by IDEM, OAQ.
 - (2) 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: "CFA Emission Models for the Reinforced Plastics Industries," Composites Fabricators Association, February 28, 1998, and shall not exceed 32.3% styrene emitted per weight of gel coat applied and 17.7% styrene emitted per weight of resin applied. For the purposes of these emission calculations, monomer in resins and gel coats that is not styrene shall be considered as styrene on an equivalent weight basis.
- (b) Resins and gel coats used, including filled resins and tooling resins and gel coats, shall be limited to maximum monomer contents of 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, controlled spraying, 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 % styrene 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.

Pursuant to CP003-4356-00071, the Best Available Control Technology (BACT) determined for the fiberglass fabrication operation at the source shall also include using vinylester resins as a barrier coat between the plexiglass acrylic sheets and the polyester resins when manufacturing fiberglass reinforced products.

Based on the information provided by the source in support of the BACT determination for CP003-4356-00071, the vinylester resins used as a barrier coat shall have a maximum styrene content of 47.5% and the polyester resins shall have a maximum styrene content 39% to achieve proper adhesion. The vinylester resins with up to 47.5% styrene content and the polyester resins with 39% styrene content used for manufacturing fiberglass reinforced products shall not be included in calculating the monomer content limits described in the preceding paragraphs.

- (c) Flow coaters, a type of non-spray application technology of a design and specifications to be approved by IDEM, OAQ, shall be used to apply 100% of all neat resins used within one (1) year of issuance of this Part 70 Operating Permit.

If, after one (1) year of operation it is not possible to apply a portion of neat resins with flow coaters, equivalent emissions reductions must be obtained via use of other techniques, such as those listed in Condition D.1.1(b) above, elsewhere in the process.

- (d) Optimized spray techniques according to a manner approved by IDEM shall be used for gel coats and filled resins (where fillers are required for corrosion or fire retardant purposes) at all times. 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 coating 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.