



Mitchell E. Daniels, Jr.  
Governor

Thomas W. Easterly  
Commissioner

100 North Senate Avenue  
Indianapolis, Indiana 46204  
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(800) 451-6027  
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TO: Interested Parties / Applicant  
DATE: October 20, 2006  
RE: Tracy Boulas, dba K & K Fiberglass / 085-20090-00082  
FROM: Nisha Sizemore  
Chief, Permits Branch  
Office of Air Quality

### Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, 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 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **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.dot 03/23/06



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## Federally Enforceable State Operating Permit Renewal OFFICE OF AIR QUALITY

**Tracy Boulas, dba, K & K Fiberglass  
103 S. Tucker  
Mentone, Indiana 46539**

(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. 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.**

Indiana statutes from IC 13 and rules from 326 IAC, quoted 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 FESOP under 326 IAC 2-8.

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 2-8 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.: F085-20090-00082	
Issued by: Original signed by Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: October 20, 2006  Expiration Date: October 20, 2011

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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 2-8-3(b)]

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The Permittee owns and operates a stationary fiberglass reinforced boat component production facility.

Authorized Individual:	Tracy Boulas, President
Source Address:	103 S. Tucker, Mentone, IN 46539
Mailing Address:	P.O. Box 428, Mentone, IN 46539
General Source Phone Number:	574-353-1512
SIC Code:	3089, 3732
County Location:	Kosciusko
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD Minor Source, Section 112 of the Clean Air Act

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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

- (a) Two (2) gel coat spray guns, identified as SG<sub>1</sub> and SG<sub>2</sub>, installed in 1998, for gel coating boat components, with a combined maximum capacity of 17.94 lb/hr, equipped with a dry filter DF<sub>1</sub>, and exhausting at stack ST<sub>1</sub>.
- (b) A lamination spray gun, identified as SG<sub>3</sub>, installed in 1998, for laminating boat components, with a maximum capacity of 83.3 lb/hr, equipped with a dry filter DF<sub>2</sub> and exhausting at stack ST<sub>2</sub>.

### A.3 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(3)(I)]

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This stationary source also includes the following insignificant activities as defined in 326 IAC 2-7-1(21):

- (a) Five (5) natural gas-fired combustion sources, used for space heating, with heat input equal to or less than 10 million Btu per hour.
- (b) A mold maintenance process, identified as MM, for molding boat components, with a maximum capacity of 0.274 lb/hr, with a potential to emit (PTE) volatile organic compounds (VOC) less than 5 tons/year, PTE a single hazardous air pollutant (HAP) less than 1 ton/year, and PTE any combination of HAP less than 2.5 tons/year.
- (c) A band saw, chop saw, skill saw, jig saw, and table saw, all part of a woodworking process, identified as WW, with a maximum capacity of 15.0 lb/hr, with PTE particulate less than 5 tons/yr. [326 IAC 6-3]
- (d) Five hand routers and one hand sander located in a grinding area, identified as GR, with a combined maximum capacity of 96.56 lb/hr, equipped with a dry filter DF<sub>3</sub>, and exhausting at stack ST<sub>3</sub>, with PTE particulate less than 5 tons/yr. [326 IAC 6-3]

- (e) An aqueous parts washer, identified as PW, with a maximum capacity of 0.47 lb/hr, with PTE VOC less than 5 tons/yr. [326 IAC 8-3]

A.4 FESOP Applicability [326 IAC 2-8-2]

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This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) to renew a Federally Enforceable State Operating Permit (FESOP).

## **SECTION B GENERAL CONDITIONS**

### **B.1 Definitions [326 IAC 2-8-1]**

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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 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]**

- 
- (a) This permit, 085-20090-00082, 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 until the renewal permit has been issued or denied.

### **B.3 Term of Conditions [326 IAC 2-1.1-9.5]**

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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 2-8-6]**

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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 2-8-4(4)]**

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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 2-8-4(5)(D)]**

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This permit does not convey any property rights of any sort or any exclusive privilege.

### **B.7 Duty to Provide Information [326 IAC 2-8-4(5)(E)]**

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- (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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1). 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 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.9 Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]

- (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 an "authorized individual" 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) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

B.10 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (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 July 1 of each year to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251

- (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 2-8-4(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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.11 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)][326 IAC 2-8-5(a)(1)]

- (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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (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.12 Emergency Provisions [326 IAC 2-8-12]

- (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 except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or 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  
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 2-8-4(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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (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 2-8-3(c)(6) 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 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
- (1) 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.
  - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
    - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

- (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

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

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- (a) All terms and conditions of permits established prior to 085-20090-00082 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
  - (2) revised, or
  - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

**B.14 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]**

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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 2-8-3(h) and 326 IAC 2-8-9.

**B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]**

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- (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  
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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (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 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]**

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- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State 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 2-8-4(5)(C)] The notification by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (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 2-8-8(a)]
- (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 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(c), 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 2-8-8(c)]

**B.17 Permit Renewal [326 IAC 2-8-3(h)]**

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- (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 2-8-3. 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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
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 2-8 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 Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]

- (a) Permit amendments and revision are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 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  
Indianapolis, Indiana 46204-2251
- Any such application shall be certified by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.19 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) through (d) 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 approval required by 326 IAC 2-8-11.1 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  
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 2-8-15(b) through (d). 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 2-8-15(b)(2), (c)(1), and (d).

- (b) Emission Trades [326 IAC 2-8-15(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 2-8-15(c).
- (c) Alternative Operating Scenarios [326 IAC 2-8-15(c)]  
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 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.
- (d) 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.20 Source Modification Requirement [326 IAC 2-8-11.1]**

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A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

**B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC13-30-3-1]**

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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 FESOP 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, at reasonable times, 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, at reasonable times, 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, at reasonable times, 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.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]**

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- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 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  
Indianapolis, Indiana 46204-2251

The application which shall be submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement notice-only changes addressed in the request for a notice-only change immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][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) 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.24 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][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 2-8-4(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 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall also make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) The potential to emit particulate matter (PM) from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period.

(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.

(d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

#### C.3 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.4 Open Burning [326 IAC 4-1] [IC 13-17-9]

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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.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

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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.6 Fugitive Dust Emissions [326 IAC 6-4]

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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.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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- (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  
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 an "authorized individual" as defined by 326

IAC 2-1.1-1(1).

- (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 2-8-4(3)]**

**C.8 Performance Testing [326 IAC 3-6]**

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- (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  
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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (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]**

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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 2-8-4][326 IAC 2-8-5(a)(1)]**

### **C.10 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]**

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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  
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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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]**

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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 2-8-4(3)][326 IAC 2-8-5(1)]**

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- (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 2-8-4][326 IAC 2-8-5(a)(1)]**

### **C.13 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]**

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If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

### **C.14 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]**

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- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction

and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:

- (1) initial inspection and evaluation
  - (2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or
  - (3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
- (1) monitoring results;
  - (2) review of operation and maintenance procedures and records;
  - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall maintain the following records:
- (1) monitoring data;
  - (2) monitor performance data, if applicable; and
  - (3) corrective actions taken.

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

- (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 response action documents submitted pursuant to this condition do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

## **Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]**

### **C.16 General Record Keeping Requirements[326 IAC 2-8-4(3)] [326 IAC 2-8-5]**

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- (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.17 General Reporting Requirements [326 IAC 2-8-4(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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (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  
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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (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.18 Compliance with 40 CFR 82 and 326 IAC 22-1**

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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:

Gel coating and lamination:

- (a) Two (2) gel coat spray guns, identified as SG<sub>1</sub> and SG<sub>2</sub>, installed in 1998, for gel coating boat components, with a combined maximum capacity of 17.94 lb/hr, equipped with a dry filter DF<sub>1</sub>, and exhausting at stack ST<sub>1</sub>.
- (b) A lamination spray gun, identified as SG<sub>3</sub>, installed in 1998, for laminating boat components, with a maximum capacity of 83.3 lb/hr, equipped with a dry filter DF<sub>2</sub> and exhausting at stack ST<sub>2</sub>.

(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 2-8-4(1)]

#### D.1.1 Hazardous Air Pollutants Limit [326 IAC 2-8][40 CFR Part 63][326 IAC 20-56]

Use of resins and gel coats shall be limited such that the potential to emit (PTE) styrene from resins and gel coats shall be less than 10 tons per twelve (12) consecutive months with compliance determined at the end of each month. Compliance with this limit shall be determined based upon the following criteria:

- (a) 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 compound 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.
- (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 or its updates.

This limit renders the requirements of 326 IAC 20-56 (Reinforced Plastic Composites Production), 40 CFR Part 63 (National Emission Standards for Hazardous Air Pollutants for Source Categories), and 326 IAC 2-7 (Part 70 Permit Program) not applicable.

#### D.1.2 Particulate Emission Limitations [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(d), gel coat spray guns, identified as SG<sub>1</sub> and SG<sub>2</sub>, and lamination spray gun, identified as SG<sub>3</sub>, shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, operated in accordance with manufacturer's specifications.

#### D.1.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

### Compliance Determination Requirements

#### D.1.4 Hazardous Air Pollutants

Compliance with the condition D.1.1 shall be determined using one of the following methods to determine styrene content of resins and gel coats and the following equation:

- (a) The manufacturer's certified product data sheet;
- (b) The manufacturer's material safety data sheet;
- (c) Sampling and analysis, using any of the following test methods, as applicable:
  - (1) 40 CFR 60, Method 24, Appendix A (July 1, 1998), shall be used to measure the total volatile HAP and volatile organic compound (VOC) content of resins and gel coats. Method 24 may be modified for measuring the volatile HAP content of resins or gel coats to require that the procedure be performed on uncatalyzed resin or gel coat samples.
  - (2) 40 CFR 63, Method 311, Appendix A (July 1, 1998), shall be used to measure HAP content in resins and gel coats by direct injection into a gas chromatograph; or
- (d) An alternate method approved by IDEM, OAQ.

$$\text{Styrene Emissions (tons/yr)} = \frac{(\text{Tons of Cutaway White Gelcoat/yr} * 276 \text{ lbs of Styrene/ton})}{2000 \text{ lbs/ton}} +$$
$$\frac{(\text{Tons of Med Gray Primer Gelcoat/yr} * 315 \text{ lbs of Styrene/ton})}{2000 \text{ lbs/ton}} + \frac{(\text{Tons of 610AA - 250 Polyester Resin/yr} * 66 \text{ lbs of Styrene/ton})}{2000 \text{ lbs/ton}} +$$

(Tons of DBFBP/yr \* 22.00 % styrene \* 1.0%);

using emission factors for styrene emissions obtained from "Unified Emission Factors for Open Molding of Composites," Composites Fabricators Association, amended July 23, 2001 or its updates.

### **Compliance Monitoring Requirements [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]**

#### **D.1.5 Monitoring**

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks ST<sub>1</sub> and ST<sub>2</sub> while one or more of the booths are in operation. If abnormal emissions are 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.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. If abnormal emissions are 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.

#### **D.1.6 Visible Emissions Notations**

- (a) Weekly visible emission notations of the surface coating booth stacks ST<sub>1</sub> and ST<sub>2</sub> stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. 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 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 2-8-4(3)]**

#### **D.1.7 Record Keeping Requirements**

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- (a) To document compliance with Conditions D.1.5, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections.
- (b) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the styrene usage limits and/or the styrene emission limits established in Condition D.1.2.
  - (1) The amount and styrene 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, containing styrene, usage for each month;
  - (4) The total styrene usage for each month; and
  - (5) The weight of styrene emitted for each compliance period.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### **D.1.8 Reporting Requirements**

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A quarterly summary of the information to document compliance with Condition D.1.1 (a) shall be submitted to the address 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.

## SECTION D.2 FACILITY OPERATION CONDITIONS

### Emissions Unit Description: Insignificant Activities

An aqueous parts washer, identified as PW, with a maximum capacity of 0.47 lb/hr, with PTE VOC less than 5 tons/yr. [326 IAC 8-3]

(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 2-8-4(1)]

#### D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations) for cold cleaning operations constructed after January 1, 1980, the owner or operator shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) 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.

#### D.2.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility construction of which commenced after July 1, 1990, shall ensure that the following control equipment requirements are met:

- (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
  - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
  - (B) The solvent is agitated; or
  - (C) The solvent is heated.
- (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

- (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
  - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
  - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
    - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
    - (B) A water cover when the solvent used is insoluble in, and heavier than, water.
    - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility construction of which commenced after July 1, 1990, shall ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
  - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
  - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
CERTIFICATION**

Source Name: Tracy Boulas, dba, K & K Fiberglass  
Source Address: 103 S. Tucker, Mentone, IN 46539  
Mailing Address: P. O. Box 428, Mentone, IN 46539  
FESOP No.: F085-20090-00082

**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:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE BRANCH  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251  
Phone: 317-233-0178  
Fax: 317-233-6865**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
EMERGENCY OCCURRENCE REPORT**

Source Name: Tracy Boulas, dba, K & K Fiberglass  
Source Address: 103 S. Tucker, Mentone, IN 46539  
Mailing Address: P. O. Box 428, Mentone, IN 46539  
FESOP No.: F085-20090-00082

**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 Describe:
Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>x</sub> , 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

### FESOP Quarterly Report

Source Name: Tracy Boulas, dba, K & K Fiberglass  
 Source Address: 103 S. Tucker, Mentone, IN 46539  
 Mailing Address: P. O. Box 428, Mentone, IN 46539  
 FESOP No.: F085-20090-00082  
 Facility: SG1, SG2, SG3, and any styrene-emitting insignificant units  
 Parameter: Styrene Emissions  
 Limit: Less than 10 tons per 12 consecutive month period, with compliance determined at the end of each month based on the following equation:

$$\text{Styrene Emissions (tons/yr)} = \frac{(\text{Tons of Cutaway White Gelcoat/yr} * 276 \text{ lbs of Styrene/ton})}{2000 \text{ lbs/ton}} +$$

$$\frac{(\text{Tons of Med Gray Primer Gelcoat/yr} * 315 \text{ lbs of Styrene/to n})}{2000 \text{ lbs/ton}} + \frac{(\text{Tons of 610AA - 250 Polyester Resin/yr} * 66 \text{ lbs of Styrene/to n})}{2000 \text{ lbs/ton}} +$$

$$(\text{Tons of DBFBP/yr} * 22.00 \% \text{ styrene} * 1.0\%)$$

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**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Tracy Boulas, dba, K & K Fiberglass  
Source Address: 103 S. Tucker, Mentone, IN 46539  
Mailing Address: P. O. Box 428, Mentone, IN 46539  
FESOP No.: F085-20090-00082

Months: \_\_\_\_\_ to \_\_\_\_\_ Year: \_\_\_\_\_

Page 1 of 2

<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	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

Form Completed By: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

## Unified Emission Factors for Open Molding of Composites

July 23, 2001

### Emission Rate in Pounds of Styrene Emitted per Ton of Resin or Gelcoat Processed

Styrene content in resin/gelcoat, % <sup>(1)</sup>	<33 <sup>(2)</sup>	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	>50 <sup>(2)</sup>
<b>Manual</b>	0.126 x %styrene x 2000	83	89	94	100	106	112	117	123	129	134	140	146	152	157	163	169	174	180	((0.286 x %styrene) - 0.0529) x 2000
<b>Manual w/ Vapor Suppressed Resin VSR <sup>(3)</sup></b>	<b>Manual emission factor</b> [listed above] x (1-(0.50 x specific VSR reduction factor for each resin/suppressant formulation))																			
<b>Mechanical Atomized</b>	0.169 x %styrene x 2000	111	126	140	154	168	183	197	211	225	240	254	268	283	297	311	325	340	354	((0.714 x %styrene) - 0.18) x 2000
<b>Mechanical Atomized with VSR <sup>(3)</sup></b>	<b>Mechanical Atomized emission factor</b> [listed above] x (1-(0.45 x specific VSR reduction factor for each resin/suppressant formulation))																			
<b>Mechanical Atomized Controlled Spray <sup>(4)</sup></b>	0.130 x %styrene x 2000	86	97	108	119	130	141	152	163	174	185	196	207	218	229	240	251	262	273	0.77 x ((0.714 x %styrene) - 0.18) x 2000
<b>Mechanical Controlled Spray with VSR</b>	<b>Mechanical Atomized Controlled Spray emission factor</b> [listed above] x (1-(0.45 x specific VSR reduction factor for each resin/suppressant formulation))																			
<b>Mechanical Non-Atomized</b>	0.107 x %styrene x 2000	71	74	77	80	83	86	89	93	96	99	102	105	108	111	115	118	121	124	((0.157 x %styrene) - 0.0165) x 2000
<b>Mechanical Non-Atomized with VSR <sup>(3)</sup></b>	<b>Mechanical Non-Atomized emission factor</b> [listed above] x (1-(0.45 x specific VSR reduction factor for each resin/suppressant formulation))																			
<b>Filament application</b>	0.184 x %styrene x 2000	122	127	133	138	144	149	155	160	166	171	177	182	188	193	199	204	210	215	((0.2746 x %styrene) - 0.0298) x 2000
<b>Filament application with VSR <sup>(3)</sup></b>	0.120 x %styrene x 2000	79	83	86	90	93	97	100	104	108	111	115	118	122	125	129	133	136	140	0.65 x ((0.2746 x %styrene) - 0.0298) x 2000
<b>Gelcoat Application</b>	0.445 x %styrene x 2000	294	315	336	356	377	398	418	439	460	481	501	522	543	564	584	605	626	646	((1.03646 x %styrene) - 0.195) x 2000
<b>Gelcoat Controlled Spray Application <sup>(4)</sup></b>	0.325 x %styrene x 2000	215	230	245	260	275	290	305	321	336	351	366	381	396	411	427	442	457	472	0.73 x ((1.03646 x %styrene) - 0.195) x 2000
<b>Gelcoat Non-Atomized Application <sup>(6)</sup></b>	SEE <b>Note 9</b> below	196	205	214	223	232	241	250	259	268	278	287	296	305	314	323	332	341	350	((0.4506 x %styrene) - 0.0505) x 2000
<b>Covered-Cure after Roll-Out</b>	<b>Non-VSR process emission factor</b> [listed above] x (0.80 for Manual <or> 0.85 for Mechanical)																			
<b>Covered-Cure without Roll-Out</b>	<b>Non-VSR process emission factor</b> [listed above] x (0.50 for Manual <or> 0.55 for Mechanical)																			

### Emission Rate in Pounds of Methyl Methacrylate Emitted per Ton of Gelcoat Processed

MMA content in gelcoat, % <sup>(6)</sup>	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	≥20
<b>Gel coat application <sup>(7)</sup></b>	15	30	45	60	75	90	105	120	135	150	165	180	195	210	225	240	255	270	285	0.75 x %MMA x 2000

**Notes**

- 1 Including styrene monomer content as supplied, plus any extra styrene monomer added by the molder, but before addition of other additives such as powders, fillers, glass,...etc.
- 2 Formulas for materials with styrene content < 33% are based on the emission rate at 33% (constant emission factor expressed as percent of available styrene), and for styrene content > 50% on the emission rate based on the extrapolated factor equations; these are not based on test data but are believed to be conservative estimates. The value for "% styrene" in the formulas should be input as a fraction. For example, use the input value 0.30 for a resin with 30% styrene content by wt.
- 3 The VSR reduction factor is determined by testing each resin/suppressant formulation according to the procedures detailed in the **CFA Vapor Suppressant Effectiveness Test**.
- 4 SEE the **CFA Controlled Spray Handbook** for a detailed description of the controlled spray procedures.
- 5 The effect of vapor suppressants on emissions from filament winding operations is based on the **Dow Filament Winding Emissions Study**.
- 6 Including MMA monomer content as supplied, plus any extra MMA monomer added by the molder, but before addition of other additives such as powders, fillers, glass,...etc.
- 7 Based on gelcoat data from **NMMA Emission Study**.
- 8 SEE the July 17, 2001 EECS report **Emission Factors for Non-Atomized Application of Gel Coats used in the Open Molding of Composites** for a detailed description of the non-atomized gelcoat testing.
- 9 Use the equation **((0.4506 x %styrene) - 0.0505) x 2000** for gelcoats with styrene contents between 19% and 32% by wt.; use the equation **0.185 x %styrene x 2000** for gelcoats with less than 19% styrene content by wt.

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

Technical Support Document (TSD) for a Federally Enforceable State Operating Permit  
(FESOP) Renewal

**Source Background and Description**

<b>Source Name:</b>	Tracy Boulas, dba K & K Fiberglass
<b>Source Location:</b>	103 S. Tucker, Mentone, IN 46539
<b>County:</b>	Kosciusko
<b>SIC Code:</b>	3732, 3089
<b>Operation Permit No.:</b>	F085-10372-00082
<b>Operation Permit Issuance Date:</b>	June 5, 2000
<b>Permit Renewal No.:</b>	F085-20090-00082
<b>Permit Reviewer:</b>	HDR/Jason Gilbert

The Office of Air Quality (OAQ) has reviewed a FESOP renewal application from Tracy Boulas, dba K & K Fiberglass relating to the operation of fiberglass reinforced boat component production facility.

**Permitted Emission Units and Pollution Control Equipment**

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

- (a) Two (2) gel coat spray guns, identified as SG<sub>1</sub> and SG<sub>2</sub>, installed in 1998, for gel coating boat components, with a combined maximum capacity of 17.94 lb/hr, equipped with a dry filter DF<sub>1</sub>, and exhausting at stack ST<sub>1</sub>.
- (b) A lamination spray gun, identified as SG<sub>3</sub>, installed in 1998, for laminating boat components, with a maximum capacity of 83.3 lb/hr, equipped with a dry filter DF<sub>2</sub> and exhausting at stack ST<sub>2</sub>.

**Insignificant Activities**

The source also consists of the following insignificant activities, all installed in 1998, as defined in 326 IAC 2-7-1(21):

- (a) Five (5) natural gas-fired combustion sources, used for space heating, with heat input equal to or less than 10 million Btu per hour.
- (b) A mold maintenance process, identified as MM, for molding boat components, with a maximum capacity of 0.274 lb/hr, with a potential to emit (PTE) volatile organic compounds (VOC) less than 5 tons/year, PTE a single hazardous air pollutant (HAP) less than 1 ton/year, and PTE any combination of HAP less than 2.5 tons/year.
- (c) A band saw, chop saw, skill saw, jig saw, and table saw, all part of a woodworking process, identified as WW, with a maximum capacity of 15.0 lb/hr, with PTE particulate less than 5 tons/yr. [326 IAC 6-3]

- (d) Five hand routers and one hand sander located in a grinding area, identified as GR, with a combined maximum capacity of 96.56 lb/hr, equipped with a dry filter DF<sub>3</sub>, and exhausting at stack ST<sub>3</sub>, with PTE particulate less than 5 tons/yr. [326 IAC 6-3]
- (e) An aqueous parts washer, identified as PW, with a maximum capacity of 0.47 lb/hr, with PTE VOC less than 5 tons/yr.

### Existing Approvals

The source has been operating under the previous FESOP 085-10372-00082 issued on June 5, 2000 and the following amendments and revisions:

- (a) Permit Reopening No. 085-13062-00082, issued on October 9, 2001;
- (b) Administrative Amendment No. 085-21885-00082, issued on October 24, 2005.

All conditions from previous approvals were incorporated into this FESOP except the following:

- (a) 085-10372-00082 issued on June 5, 2000

Condition D.1.2: BACT control for VOC emissions at new facilities [326 IAC 8-1-6]

~~D.1.2 BACT control for VOC emissions at new facilities [326 IAC 8-1-6]~~

- ~~(a) The source was constructed after Jan. 1 1980, but since it has the potential to emit less than 25 tons VOC per year, 326 IAC 8-1-6 will not apply.~~
- ~~(b) Any change or modification in the equipment covered in this permit which may increase the potential to emit to 25 tons VOC per year, shall require the approval of a Best Available Control Technology (BACT) plan, pursuant to 326 IAC 8-1-6, before such change may occur.~~

Reason not incorporated: Condition D.1.2 has been removed from the permit because it was not enforceable.

### Recommendation

The staff recommends to the Commissioner that the FESOP 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 administratively complete FESOP renewal application for the purposes of this review was received on September 16, 2004.

A notice of completeness letter was mailed to the source on April 21, 2006.

### Emission Calculations

The calculations submitted by the applicant have been verified and found to be accurate and correct. VOC emissions from gel coat spray guns SG<sub>1</sub> and SG<sub>2</sub> and lamination spray gun SG<sub>3</sub> were estimated by multiplying the usage by weight of each resin or gel coat by the emission factor that is appropriate for the styrene monomer content for each resin or gel coat, then summing the emissions from all resins and gel coats. Emission factors used were obtained from "Unified Emission Factors for Open Molding of Composites," Composites Fabricators Association, July 23, 2001 addendum.

See Appendix A of this document for detailed emission calculations, pages 1 – 4.

### Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source, excluding the emission limits that were contained in the previous FESOP.

Pollutant	Unrestricted Potential Emissions (tons/yr)
PM	25.01
PM-10	25.01
SO <sub>2</sub>	negligible
VOC	21.92
CO	0.2
NO <sub>x</sub>	0.2

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

HAPs	Unrestricted Potential Emissions (tons/yr)
Styrene	17.65
Toluene	0.07
Glycol Ethers	0.23
Dimethyl Phthalate	2.15
Total	20.1

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all criteria pollutants are less than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-8.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is equal to or greater than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is equal to or greater than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7. The source will be issued a FESOP because the source will limit single HAP (styrene) emissions below the Title V levels. Therefore, the source is subject to the provisions of 326 IAC 2-8.
- (c) Fugitive Emissions  
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3, fugitive emissions are not counted toward the determination of PSD applicability.

### Potential to Emit After Issuance

The source has opted to remain a FESOP source. The table below summarizes the potential to emit, reflecting all limits of the emission units. Any control equipment is considered enforceable only after issuance of this FESOP and only to the extent that the effect of the control equipment is made practically enforceable in the permit. Since the source has not constructed any new emission units, the source's potential to emit is based on the emission units included in the original FESOP.

Process/emission unit	Potential To Emit (tons/year)							
	PM	PM-10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	Styrene	Total HAPs
Gelcoat Guns (SG <sub>1</sub> , SG <sub>2</sub> )	1.16 <sup>(1)</sup>	1.16 <sup>(1)</sup>	-	5.70 <sup>(2)</sup>	-	-	5.69 <sup>(3)</sup>	5.99 <sup>(3)</sup>
Lamination Gun (SG <sub>3</sub> )	1.25 <sup>(1)</sup>	1.25 <sup>(1)</sup>	-	4.31 <sup>(2)</sup>	-	-	4.31 <sup>(3)</sup>	5.27 <sup>(3)</sup>
Natural Gas Heaters (H <sub>1</sub> , H <sub>2</sub> , H <sub>3</sub> , H <sub>4</sub> , H <sub>5</sub> )	-	-	-	-	0.2 <sup>(4)</sup>	0.2 <sup>(4)</sup>	-	-
Mold Maintenance (MM)	-	-	-	0.96 <sup>(4)</sup>	-	-	-	0.07 <sup>(4)</sup>
Woodworking	0.22 <sup>(4)</sup>	0.22 <sup>(4)</sup>	-	-	-	-	-	-
Grinding	1.22 <sup>(4)</sup>	1.22 <sup>(4)</sup>	-	-	-	-	-	-
Parts Washer (PW)	-	-	-	2.06 <sup>(4)</sup>	-	-	-	0.23 <sup>(4)</sup>
Entire Source	3.85	3.85	-	13.03	0.2	0.2	10	11.56

"-" means negligible

<sup>(1)</sup>Based on controlled emission because of control required pursuant to 326 IAC 6-3-2

<sup>(2)</sup>VOC PTE from the Gelcoat Guns and Lamination Gun are reduced based upon the Styrene limits pursuant to 326 IAC 2-8

<sup>(3)</sup>Limited pursuant to 326 IAC 2-8

<sup>(4)</sup>Unrestricted Potential to Emit

### County Attainment Status

The source is located in Kosciusko County.

Pollutant	Status
PM-2.5	Attainment
PM-10	Attainment
SO <sub>2</sub>	Attainment
NO <sub>2</sub>	Attainment
8-hr Ozone	Attainment
CO	Attainment
Lead	Attainment

\* On August 7, 2006 a temporary emergency rule took effect revoking the 1-hr Ozone standard in Indiana. The Indiana Air Pollution Control Board has approved a permanent rule revision to incorporate these changes into 326 IAC 1-4-1. The permanent revision to 326 IAC 1-4-1 will take effect prior to the expiration of the emergency rule. Therefore, the 1-hr Ozone designation was removed from the table above.

- (a) Volatile organic compounds (VOC) and nitrogen oxides (NO<sub>x</sub>) are regulated under the Clean Air Act (CAA) for purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Kosciusko County has been designated as attainment or unclassifiable for the 8-hr ozone standard. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.
- (b) Kosciusko 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 PM-10 emissions as surrogate for PM-2.5 emissions. See the State Rule Applicability – Entire Source section.
- (c) Kosciusko County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for

Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.

### Source Status

Existing Source FESOP Definition (emissions after controls, based on 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/yr)
PM	3.85
PM-10	3.85
SO <sub>2</sub>	negligible
VOC	13.03
CO	0.2
NO <sub>x</sub>	0.2
Single HAP	less than 10
Combination HAPs	11.56

- (a) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or greater and it is not in one of the 28 listed source categories.

### Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in this permit.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP)(326 IAC 14, 20 and 40 CFR Part 61, 63) included in this permit. Since the source has limited HAPs emissions such that it is a minor source of HAPs, the requirements of Subpart WWWW – NESHAP for Reinforced Plastic Composites Production, Subpart VVVV – NESHAP for Boat Manufacturing and Subpart PPPP – NESHAP for Surface Coating of Plastic Parts and Products are not included in this permit. Since the aqueous parts washer is not an individual batch vapor, inline vapor, in-line cold, or batch cold solvent cleaning machine, the requirements of Subpart T – Degreasing of Organic Cleaners are not included in this permit.

### State Rule Applicability – Entire Source

#### 326 IAC 2-2 (Prevention of Significant Deterioration)

This source, which was constructed in 1998, is not a major source under Prevention of Significant Deterioration (PSD) because the potential-to-emit of all criteria pollutants is less than two hundred fifty (250) tons per year and there have been no major modifications at this source. Therefore, the requirements of 326 IAC 2-2 (PSD) do not apply.

#### 326 IAC 2-6 (Emission Reporting)

This source is located in Kosciusko County, is not required to obtain a Part 70 Operating Permit and does not emit lead into the ambient air at a level of 5 tons per year or greater. Therefore, 326 IAC 2-6 does not apply.

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

The source was constructed after July 27, 1997 and is a major source of HAP emissions for styrene; the unrestricted potential to emit styrene is 17.66 tons per year. The source is a minor source for combined HAP emissions with an unrestricted potential to emit of 20.2 tons per year.

Without controls or limits the facility would be subject to the requirements of 326 IAC 20-56. Therefore, this source is not subject to the requirements of 326 IAC 2-4.1.

326 IAC 2-8 (Federally Enforceable State Operating Permit Program)

Use of resins and gel coats and all other sources of styrene emissions from the source shall be limited such that the potential to emit (PTE) styrene from resins and gel coats shall be less than ten (10) tons per twelve (12) consecutive months with compliance determined at the end of each month. Compliance with this limit shall be determined based upon the following criteria:

- (a) 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 compound 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.
- (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 or its updates.

Compliance with this condition shall be determined using one of the following methods to determine styrene content of resins and gel coats and the following equation:

- (a) The manufacturer's certified product data sheet;
- (b) The manufacturer's material safety data sheet;
- (c) Sampling and analysis, using any of the following test methods, as applicable:
  - (1) 40 CFR 60, Method 24, Appendix A (July 1, 1998), shall be used to measure the total volatile HAP and volatile organic compound (VOC) content of resins and gel coats. Method 24 may be modified for measuring the volatile HAP content of resins or gel coats to require that the procedure be performed on uncatalyzed resin or gel coat samples.
  - (2) 40 CFR 63, Method 311, Appendix A (July 1, 1998), shall be used to measure HAP content in resins and gel coats by direct injection into a gas chromatograph; or
- (d) An alternate method approved by IDEM, OAQ.

$$\text{Styrene Emissions (tons/yr)} = \frac{(\text{Tons of Cutaway White Gelcoat/yr} * 276 \text{ lbs of Styrene/ton})}{2000 \text{ lbs/ton}} +$$

$$\frac{(\text{Tons of Med Gray Primer Gelcoat/yr} * 315 \text{ lbs of Styrene/to n})}{2000 \text{ lbs/ton}} + \frac{(\text{Tons of 610AA - 250 Polyester Resin/yr} * 66 \text{ lbs of Styrene/to n})}{2000 \text{ lbs/ton}} +$$

(Tons of DBFBP/yr \* 22.00 % styrene \* 1.0%);

using emission factors for styrene emissions obtained from "Unified Emission Factors for Open Molding of Composites," Composites Fabricators Association, amended July 23, 2001 or its updates.

This limit renders the requirements of 40 CFR Part 63, Subpart WWWW (NESHAP for Reinforced Plastic Composites Production), 326 IAC 20-56 (Reinforced Plastic Composites Production) and 326 IAC 2-7 (Part 70 Permit Program) not applicable.

#### 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.

#### 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)

Fugitive emissions from the facility are considered negligible. Therefore, the requirements of 326 IAC 6-5 do not apply.

#### 326 IAC 20-56 (Reinforced Plastic Composites Production)

Pursuant to 326 IAC 20-56 the owner or operator of a manufacturer of reinforced plastic composites parts, products or watercraft, as defined in 40 CFR Part 63.5785, that has the potential to emit ten (10) tons per year of any HAP or twenty-five (25) tons per year of any combination of HAPs shall comply with the requirements of 40 CFR Part 63, Subpart WWWW, National Emission Standards for Hazardous Air Pollutants for Reinforced Plastic Composites Production. The facility has the potential-to-emit a single HAP, styrene, greater than ten (10) tons per year. The facility is limiting HAP emissions as discussed under 2-8. This source is not a major source of HAP; therefore 20-56 does not apply.

### **State Rule Applicability – Individual Facilities**

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

- (a) Pursuant to 326 IAC 6-3-2(d), gel coat spray guns, identified as SG<sub>1</sub> and SG<sub>2</sub>, and lamination spray gun, identified as SG<sub>3</sub>, shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, operated in accordance with manufacturer's specifications.
- (b) Pursuant to 326 IAC 6-3-2(e), the allowable particulate matter emissions rate from the woodworking process, consisting of a band saw, chop saw, skill saw, jig saw and table saw, identified as WW, and grinding area, consisting of five (5) hand router and one (1) hand sander, identified as GR, which each have a maximum process weight rate less than 100 pounds per hour, shall each not exceed 0.551 pounds per hour. The woodworking process and grinding area are exempt pursuant to 326 IAC 6-3-1(b)(14) because each process has a particulate PTE less than 0.551 pounds per hour.

#### 326 IAC 8-1-6 (Best Available Control Technology (BACT))

There are no facilities at this source with the potential-to-emit Volatile Organic Compounds greater than twenty-five (25) tons per year. The mold maintenance process, identified as MM, has an unrestricted PTE of less than five (5) tons per year of VOC. Therefore, 326 IAC 8-1-6 does not apply.

#### 326 IAC 8-3 (Degreasing Operations)

The aqueous parts washer, used to perform organic solvent degreasing operations, at the source is subject to the requirements of 326 IAC 8-3-2 because it was installed in a new facility after

January 1, 1980 and 326 IAC 8-3-5 because it was installed in a new facility after July 1, 1990. Therefore, the aqueous parts washer at the source is required to meet the following conditions:

- (a) Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations) the aqueous parts washer, identified as PW, the owner or operator 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 operation 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.
  
- (b) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility construction of which commenced after July 1, 1990, shall ensure that the following control equipment requirements are met:
  - (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
    - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
    - (B) The solvent is agitated; or
    - (C) The solvent is heated.
  - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
  - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
  - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
  - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)),

or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius ( $48.9^{\circ}\text{C}$ ) (one hundred twenty degrees Fahrenheit ( $120^{\circ}\text{F}$ )):

- (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
  - (B) A water cover when the solvent used is insoluble in, and heavier than, water.
  - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (c) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility construction of which commenced after July 1, 1990, shall ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
  - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
  - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

### Compliance Requirements

Permits issued under 326 IAC 2-8 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 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

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

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

The gel coat spray guns, identified as SG<sub>1</sub> and SG<sub>2</sub> exhausting to stack ST<sub>1</sub>, and lamination spray gun, identified as SG<sub>3</sub> exhausting to stack ST<sub>2</sub>, have applicable compliance monitoring conditions as specified below:

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks ST<sub>1</sub> and ST<sub>2</sub> while one or more of the booths are in operation. If abnormal emissions are 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.

- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. If abnormal emissions are 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.
- (c) Weekly visible emission notations of the surface coating booth stacks ST<sub>1</sub> and ST<sub>2</sub> stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. 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.
- (e) 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.
- (f) 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.

## **Conclusion**

The operation of this fiberglass facility shall be subject to the conditions of the attached FESOP 085-20090-00082.

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

**Company Name:** Tracy Boulas, dba, K & K Fiberglass  
**Address:** 103 S. Tucker, Mentone, IN 46539  
**Permit:** F085-20090-00082

**Reviewer:** HDR/Jason Gilbert  
**Date:** June 2006

Gel Coat Spray Station											
Material	Density (Lb/Gal)	Weight % Styrene Monomer or VOC	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Ton Processed per hour	CFA Unified Emission Factor (lb/ton)	Potential VOC pounds per hour	Potential Pounds of VOC per day	Potential VOC tons per year	Particulate Potential (ton/yr)	Transfer Efficiency
Cutaway White Gelcoat	10.93	31.00%	0.253	3.00	0.00415	276.00	1.14	9.16	5.01	6.27	75%
Med Gray Primer Gelcoat	10.18	37.00%	0.253	3.00	0.00386	315.00	1.22	9.74	5.33	5.33	75%
Acetone	6.59	0.00%	0.250	6.00	0.00494	0.00	0.00	0.00	0.00	0.00	100%

Resin Lamination Station											
Material	Density (Lb/Gal)	Weight % Styrene Monomer or VOC	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Ton Processed per hour	CFA Unified Emission Factor (lb/ton)	Potential VOC pounds per hour	Potential Pounds of VOC per day	Potential VOC tons per year	Particulate Potential (ton/yr)	Transfer Efficiency
Polyester Resin 610AA-250	9.18	31.00%	0.753	6.00	0.02074	66.00	1.37	10.95	5.99	12.53	90%

Catalyst											
Material	Density (Lb/Gal)	Weight % Styrene Monomer or VOC	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Ton Processed per hour	CFA Unified Emission Factor (lb/ton)	Potential VOC pounds per hour	Potential Pounds of VOC per day	Potential VOC tons per year	Particulate Potential (ton/yr)	Transfer Efficiency
Norox Clear Catalyst	9.18	3.00%	0.005	6.00	0.00014		0.01	0.07	0.04	0.29	75%
Norox Red Catalyst	9.18	3.00%	0.010	6.00	0.00028		0.02	0.13	0.07	0.59	75%

Adhesives & Sealants											
Material	Density (Lb/Gal)	Weight % Styrene Monomer or VOC	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Ton Processed per hour	CFA Unified Emission Factor (lb/ton)	Potential VOC pounds per hour	Potential Pounds of VOC per day	Potential VOC tons per year	Particulate Potential (ton/yr)	Transfer Efficiency
Zyvax Seal	7.31	95.00%	0.065	1.00	0.00024		0.45	3.61	1.98	0.00	100%

Miscellaneous											
Material	Density (Lb/Gal)	Weight % Styrene Monomer or VOC	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Ton Processed per hour	CFA Unified Emission Factor (lb/ton)	Potential VOC pounds per hour	Potential Pounds of VOC per day	Potential VOC tons per year	Particulate Potential (ton/yr)	Transfer Efficiency
Mold Release 68 Wax	10.26	59.90%	0.001	6.00	0.00003		0.04	0.29	0.16	0.00	100%
Body Filler	9.6	21.90%	0.001	6.00	0.00003		0.01	0.10	0.06	0.00	100%
Patch Booster	9.5	21.90%	0.001	6.00	0.00003		0.01	0.10	0.05	0.00	100%
Surfacing Agent	7.89	100.00%	0.001	6.00	0.00002		0.05	0.38	0.21	0.00	100%

<b>Total Potential Emissions</b>							<b>4.32</b>	<b>34.53</b>	<b>18.90</b>	<b>25.01</b>	
<b>Controlled Total Emissions</b>	<b>Control Efficiency</b>								<b>0.00%</b>	<b>90.00%</b>	
									<b>18.90</b>	<b>2.50</b>	

**METHODOLOGY**

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) \* Weight % Organics) / (1-Volume % water)

Pounds of VOC per Gallon Coating = (Density (lbs/gal) \* Weight % Organics)

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (8 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (8760 hr/year) \* (1 ton/2000 lbs)

Particulate Potential Tons per Year = (units/hour) \* (gal/unit) \* (lbs/gal) \* (1-Weight % Volatiles) \* (1-Transfer efficiency) \* (8760 hr/year) \* (1 ton/2000 lbs)

Total = Worst Coating + Sum of all solvents used

**NOTES**

Emission factors are based on Composite Fabricators Association (CFA) Unified Emission Factors.

Coating operations are mutually exclusive, therefore worst case emissions are determine the total potential emission

**Appendix A: Emissions Calculations**

**Natural Gas Combustion Only**

**MM BTU/HR <100**

**Heaters H1, H2, H3, H4, and H5**

**Company Name:** Tracy Boulas, dba, K & K Fiberglass

**Address :** 103 S. Tucker, Mentone, IN 46539

**Permit:** F085-20090-00082

**Reviewer:** HDR/Jason Gilbert

**Date:** June 2006

Heat Input Capacity  
MMBtu/hr

Potential Throughput  
MMCF/yr

0.6

4.8

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.0	0.0	0.0	0.2	0.0	0.2

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

**Appendix A: Emissions Calculations****Natural Gas Combustion Only****MM BTU/HR <100****Heaters H1, H2, H3, H4, and H5****HAPs Emissions****Company Name:** Tracy Boulas, dba, K & K Fiberglass**Address :** 103 S. Tucker, Mentone, IN 46539**Permit:** F085-20090-00082**Reviewer:** HDR/Jason Gilbert**Date:** June 2006**HAPs - Organics**

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-3	1.2E-3	75.0E-3	1.8E+0	3.4E-3
Potential Emission in tons/yr	5.086E-06	2.907E-06	1.817E-04	4.360E-03	8.235E-06

**HAPs - Metals**

	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	500.0E-6	1.1E-3	1.4E-3	380.0E-6	2.1E-3
Potential Emission in tons/yr	1.211E-06	2.664E-06	3.391E-06	9.204E-07	5.086E-06

Methodology is the same as page 3.

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**  
**Emission Units Summary - Uncontrolled Potential to Emit in Tons/Year**

**Company Name:** Tracy Boulas, dba, K & K Fiberglass  
**Address:** 103 S. Tucker, Mentone, IN 46539  
**Permit:** F085-20090-00082

**Reviewer:** HDR/Jason Gilbert  
**Date:** June 2006

<b>Emission Unit</b>	<b>PM</b>	<b>PM-10</b>	<b>SO<sub>2</sub></b>	<b>VOC</b>	<b>CO</b>	<b>NOx</b>	<b>Styrene</b>	<b>Total HAP</b>
SG <sub>1</sub> , SG <sub>2</sub> gel coat guns	0.22	0.22	-	10.07	-	-	10.04	10.56
SG <sub>3</sub> lamination gun	2.19	2.19	-	7.62	-	-	7.62	9.24
H <sub>1</sub> ,H <sub>2</sub> ,H <sub>3</sub> ,H <sub>4</sub> ,H <sub>5</sub> natural gas heaters	-	-	-	-	0.2	0.2	-	-
MM mold maintenance	-	-	-	0.96	-	-	-	0.07
<b>Woodworking</b>	0.22	0.22	-	-	-	-	-	-
<b>Grinding</b>	1.22	1.22	-	-	-	-	-	-
PW parts washer	-	-	-	2.06	-	-	-	0.23
<b>Total</b>	3.85	3.85	0	20.71	0.2	0.2	17.66	20.1

" - " = minimal emissions

This table summarizes values from calculations submitted by the applicant, which have been verified and found to be accurate and correct.

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

**Company Name:** Tracy Boulas, dba, K & K Fiberglass  
**Address:** 103 S. Tucker, Mentone, IN 46539  
**Permit:** F085-20090-00082

**Reviewer:** HDR/Jason Gilbert  
**Date:** June 2006

Gel Coat Spray Station											
Material	Density (Lb/Gal)	Weight % Styrene Monomer or VOC	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Ton Processed per hour	CFA Unified Emission Factor (lb/ton)	Potential VOC pounds per hour	Potential Pounds of VOC per day	Potential VOC tons per year	Particulate Potential (ton/yr)	Transfer Efficiency
Cutaway White Gelcoat	10.93	31.00%	0.253	3.00	0.00415	276.00	1.14	9.16	5.01	6.27	75%
Med Gray Primer Gelcoat	10.18	37.00%	0.253	3.00	0.00386	315.00	1.22	9.74	5.33	5.33	75%
Acetone	6.59	0.00%	0.250	6.00	0.00494	0.00	0.00	0.00	0.00	0.00	100%

Resin Lamination Station											
Material	Density (Lb/Gal)	Weight % Styrene Monomer or VOC	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Ton Processed per hour	CFA Unified Emission Factor (lb/ton)	Potential VOC pounds per hour	Potential Pounds of VOC per day	Potential VOC tons per year	Particulate Potential (ton/yr)	Transfer Efficiency
Polyester Resin 610AA-250	9.18	31.00%	0.753	6.00	0.02074	66.00	1.37	10.95	5.99	12.53	90%

Catalyst											
Material	Density (Lb/Gal)	Weight % Styrene Monomer or VOC	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Ton Processed per hour	CFA Unified Emission Factor (lb/ton)	Potential VOC pounds per hour	Potential Pounds of VOC per day	Potential VOC tons per year	Particulate Potential (ton/yr)	Transfer Efficiency
Norox Clear Catalyst	9.18	3.00%	0.005	6.00	0.00014		0.01	0.07	0.04	0.29	75%
Norox Red Catalyst	9.18	3.00%	0.010	6.00	0.00028		0.02	0.13	0.07	0.59	75%

Adhesives & Sealants											
Material	Density (Lb/Gal)	Weight % Styrene Monomer or VOC	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Ton Processed per hour	CFA Unified Emission Factor (lb/ton)	Potential VOC pounds per hour	Potential Pounds of VOC per day	Potential VOC tons per year	Particulate Potential (ton/yr)	Transfer Efficiency
Zyvox Seal	7.31	95.00%	0.065	1.00	0.00024		0.45	3.61	1.98	0.00	100%

Miscellaneous											
Material	Density (Lb/Gal)	Weight % Styrene Monomer or VOC	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Ton Processed per hour	CFA Unified Emission Factor (lb/ton)	Potential VOC pounds per hour	Potential Pounds of VOC per day	Potential VOC tons per year	Particulate Potential (ton/yr)	Transfer Efficiency
Mold Release 68 Wax	10.26	59.90%	0.001	6.00	0.00003		0.04	0.29	0.16	0.00	100%
Body Filler	9.6	21.90%	0.001	6.00	0.00003		0.01	0.10	0.06	0.00	100%
Patch Booster	9.5	21.90%	0.001	6.00	0.00003		0.01	0.10	0.05	0.00	100%
Surfacing Agent	7.89	100.00%	0.001	6.00	0.00002		0.05	0.38	0.21	0.00	100%

<b>Total Potential Emissions</b>							4.32	34.53	18.90	25.01	
<b>Control Efficiency</b>									0.00%	90.00%	
<b>Controlled Total Emissions</b>									18.90	2.50	

**METHODOLOGY**

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) \* Weight % Organics) / (1-Volume % water)  
Pounds of VOC per Gallon Coating = (Density (lbs/gal) \* Weight % Organics)  
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr)  
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (8 hr/day)  
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (8760 hr/year) \* (1 ton/2000 lbs)  
Particulate Potential Tons per Year = (units/hour) \* (gal/unit) \* (lbs/gal) \* (1-Weight % Volatiles) \* (1-Transfer efficiency) \* (8760 hr/year) \* (1 ton/2000 lbs)  
Total = Worst Coating + Sum of all solvents used

**NOTES**

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