



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant
DATE: June 3, 2005
RE: Gold Shield Of Indiana, Inc / 001-21219-00043
FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision – Approval

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

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

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

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

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

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

Enclosures
FNPER-AM.dot 1/10/05



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

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Mr. Peter M. Stephenson
Director of Gold Shield Operations
Gold Shield of Indiana, Inc.
P.O. Box 496
Decatur, Indiana 46733

June 3, 2005

Re: 001-00043
Second Administrative Amendment to
Part 70 Permit 001-6067-00043

Dear Mr. Stephenson:

Gold Shield of Indiana, Inc. located on Patterson Street in Decatur, Indiana was issued a Part 70 operating permit on February 19, 2001. A letter requesting an administrative amendment was received on May 3, 2005, for a revision concerning the description of two spray booths in Sections A.2 and D.1 of the operating permit. Pursuant to the provisions of 2-7-11 the permit is hereby administratively amended as follows:

One (1) spray booth identified as GB2, constructed in 1982, using gel coat, lamination and spray equipment and equipped with dry filters as overspray control, exhausting to Stacks B-1-9 and B-1-11, capacity: 1,200 square feet of fiberglass parts per hour.

One (1) spray booth identified as LB1, constructed in 1982, using gel coat, lamination and spray equipment and equipped with dry filters as overspray control, exhausting to Stacks B-1-12 and B-1-14, capacity: 1,200 square feet of material per hour.

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

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. Questions should be directed to Lawrence Stapf, OAQ, 100 North Senate Avenue, Indianapolis, Indiana, 46204, or call (800) 451-6027, and ask for Lawrence Stapf extension 2-8427, or dial his direct line (317) 232-8427.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments

LWS

cc: File – Adams County
U.S. EPA, Region V
Adams County Health Department
Air Compliance Section Inspector: Ryan Hillman
Compliance Data Section
Administrative and Development



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PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

Gold Shield of Indiana, Inc.
2004 Patterson Street
Decatur, Indiana 46733
 and
2709 Patterson Street
Decatur, Indiana 46733

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No: T001-6067-00035	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: February 19, 2001 Expiration Date: February 19, 2006

First Administrative Amendment AA 001-17456-00035, issued on August 7, 2003

Second Administrative Amendment AA 001-21219-00035	Pages Affected: 5, 28, 29, 33 and 34
Issued by: Paul Dubenetzky, Chief Permits Branch Office of Air Quality	Issuance Date: June 3, 2005



SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary custom molded fiberglass reinforced products source.

Responsible Official:	Pete Stephenson
Source Addresses:	2004 Patterson Street, Decatur, Indiana 46733; and 2709 Patterson Street, Decatur, Indiana 46733
Mailing Address:	P.O. Box 496, Decatur, Indiana 46733
Phone Number:	219-728-2476
SIC Code:	3089
County Location:	Adams
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under PSD Rules; Major Source, Section 112 of the Clean Air Act

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

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

Building 43-1

- (a) One (1) lamination and gel coat booth, identified as PC1, constructed in 1994, using flow coaters and impingement guns and equipped with dry filters as overspray control, exhausting to Stacks B-1-1 through B-1-3, capacity: 375 square feet of resin per hour.
- (b) One (1) lamination and gel coat booth, identified as PC2, constructed in 1982, using flow coaters and impingement guns and equipped with dry filters as overspray control, exhausting to Stacks B-1-1 through B-1-3, capacity: 375 square feet of fiberglass parts per hour.
- (c) One (1) spray booth, identified as GB2, constructed in 1982, using impingement guns and equipped with dry filters as overspray control, exhausting to Stacks B-1-9 and B-1-11, capacity: 1,200 square feet of fiberglass parts per hour.
- (d) One (1) spray booth, identified as LB1, constructed in 1982, using flow coaters and equipped with dry filters as overspray control, exhausting to Stacks B-1-12 through B-1-14, capacity: 1,200 square feet of material per hour.
- (e) One (1) spray booth, identified as SB1, constructed in 1993, using high volume, low pressure (HVLP) spray equipment and equipped with dry filters for overspray control, exhausting to Stacks C-1-1 through C-1-3, capacity: 69 square feet of fiberglass parts per hour.
- (f) One (1) paint booth, identified as P1, constructed in 1995, using high volume, low pressure (HVLP) spray equipment and equipped with dry filters for overspray control, exhausting to Stack P1, capacity: 69 square feet of fiberglass parts per hour.

SECTION D.1

FACILITY OPERATION CONDITIONS

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

Building 43-1

- (a) One (1) lamination and gel coat booth, identified as PC1, constructed in 1994, using flow coaters and impingement guns and equipped with dry filters as overspray control, exhausting to Stacks B-1-1 through B-1-3, capacity: 375 square feet of resin per hour.
- (b) One (1) lamination and gel coat booth, identified as PC2, constructed in 1982, using flow coaters and impingement guns and equipped with dry filters as overspray control, exhausting to Stacks B-1-1 through B-1-3, capacity: 375 square feet of fiberglass parts per hour.
- (c) One (1) spray booth, identified as GB2, constructed in 1982, using impingement guns and equipped with dry filters as overspray control, exhausting to Stacks B-1-9 and B-1-11, capacity: 1,200 square feet of fiberglass parts per hour.
- (d) One (1) spray booth, identified as LB1, constructed in 1982, using flow coaters and equipped with dry filters as overspray control, exhausting to Stacks B-1-12 through B-1-14, capacity: 1,200 square feet of material per hour.
- (e) One (1) spray booth, identified as SB1, constructed in 1993, using high volume, low pressure (HVLP) spray equipment and equipped with dry filters for overspray control, exhausting to Stacks C-1-1 through C-1-3, capacity: 69 square feet of fiberglass parts per hour.
- (f) One (1) paint booth, identified as P1, constructed in 1995, using high volume, low pressure (HVLP) spray equipment and equipped with dry filters for overspray control, exhausting to Stack P1, capacity: 69 square feet of fiberglass parts per hour.

Building 43-2:

- (g) Three (3) gel booths, identified as GB1, GB2, and GB3, installed in 1985, using impingement guns and equipped with dry filters as overspray control, exhausting to stacks B-1-1 through B-1-6, capacity: 1250 square feet of fiberglass parts per hour, each.
- (h) Four (4) chop booths, identified as CB1, CB2, CB3 and CB4, installed in 1985, using flow coaters and equipped with dry filters as overspray control, exhausting to stacks B-2-1 through B-2-14, capacity: 1250 square feet of fiberglass parts per hour, each.
- (i) One (1) paint system, identified as PS, installed in 1994, equipped with a water wash system as overspray control and consisting of the following equipment:
 - (1) One (1) tack-off booth, exhausting to stack C-2, capacity: 1250 square feet of fiberglass parts per hour.

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

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

- (2) One (1) prime booth 1, equipped with high volume, low pressure (HVLP) spray guns, exhausting to stacks C-3-1 and C-3-2, capacity: 1250 square feet of fiberglass parts per hour.
- (3) One (1) flash-off room, exhausting to stack C-3-3, capacity: 1250 square feet of fiberglass parts per hour.
- (4) One (1) prime booth 2, equipped with high volume, low pressure (HVLP) spray guns, exhausting to stacks C-3-4 and C-3-5, capacity: 1250 square feet of fiberglass parts per hour.
- (5) One (1) flash-off room, exhausting to stack C-3-6, capacity: 1250 square feet of fiberglass parts per hour.
- (6) One (1) cure oven, fired by natural gas, exhausting to stack C-4, capacity: 1250 square feet of fiberglass parts per hour and 4.15 million British thermal units per hour.
- (7) One (1) recirculation type dust blow-off booth with no external exhaust, equipped with an internal recirculation exhaust system with an air flow rate of 25,000 dry standard cubic feet per minute.
- (j) One (1) paint booth, identified as PB1, installed in 1985, using high volume, low pressure (HVLP) spray guns and equipped with dry filters for overspray control, exhausting to stack B-4-1, capacity: 1250 square feet of fiberglass parts per hour.

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

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

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 2-2-3] [326 IAC 8-1-6]

- (a) Pursuant to the determination of Best Available Control Technology for VOC emissions from resin and gel coat application operations at the two (2) lamination and gel coat booths at Plant 43-1 (PC1 and PC2), one (1) spray booth at Plant 43-1 (GB2), one (1) spray booth (LB1) at Plant 43-1, one (1) spray booth (SB1) at Plant 43-1, three (3) gel booths (GB1, GB2 and GB3) at Plant 43-2, and four (4) chop booths (CB1, CB2, CB3 and CB4) at Plant 43-2, the Permittee shall comply with the following conditions:
 - (1) Pursuant to CP 001-4127-00037, issued on October 17, 1995, the use of gel coats, resins, solvents and coatings shall be limited such that the potential to emit (PTE) VOCs from the total source, excluding combustion, shall be no more than 724 tons per twelve (12) consecutive month period. These VOC emissions shall be calculated on a daily basis with the weekly average, based on a six working day week, not to exceed the daily emission rate of 2.41 tons per day. Compliance with this limit shall be determined based upon the following criteria:
 - (A) Weekly usage by weight, monomer content that is VOC, 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.

These conditions are not incorporated into this permit because, due to the change in the emission factors for fiberglass operations, the emissions from these facilities have changed. Therefore, all fiberglass operations are included in the BACT in this permit.

- (f) Operation Conditions 5(b), (c), (d), (e), and (f) (iv) through (vi) from CP 001-4127-00037, issued on October 17, 1995 are no longer applicable. The conditions and reasons they are not applicable are as follows:
- (1) Condition 5(b), which states that this source shall be limited to a production schedule of 300 days per year and compliance with this limit shall be considered satisfied provided that daily records, as approved by the commissioner demonstrating compliance with operation Condition 5(b) shall be maintained for a minimum period of two years and made available to the Office of Air Quality upon request, is not applicable because the source is taking a limit on the amount of VOC used annually. Therefore, limiting the operating hours of the plant does not decrease the emissions and can only increase the concentration of emissions in a given time period.
 - (2) Condition 5(c), which states that the total amount of acetone used at this source shall be limited to 14.83 tons per month is not applicable because acetone has since been determined to be an exempt solvent
 - (3) Condition 5(d), which states that the styrene monomer content of the resins used in the chop booth operations shall not exceed an annual weighted average of 50%, with the styrene monomer content of each individual resin used not to exceed 55% by weight, is not applicable because these limits are replaced in (a) in this condition by the monomer content limits based upon current information regarding available materials.
 - (4) Condition 5(f)(iv), (v) and (vi), which state that the overspray shall be minimized by spraying as close as practical into the molds, the application equipment operators shall be instructed and trained in the methods and practices utilized to minimize the overspray emitted on the floor and into the air filters, and the parts shall be placed underneath infrared lights to decrease the gelation time as required by ambient temperature conditions, are not applicable because the pollution prevention techniques are replaced in (a) of this condition by techniques determined to be part of BACT based upon current information.

D.1.2 Particulate Matter (PM) [326 IAC 6-3-2]

The PM from the two (2) lamination and gel coat booths at Plant 43-1 (PC1 and PC2), one (1) spray booth at Plant 43-1 (GB2), one (1) spray booth (LB1) at Plant 43-1, two (2) spray booths (SB1 and P1) at Plant 43-1, three (3) gel booths (GB1, GB2 and GB3) at Plant 43-2, four (4) chop booths (CB1, CB2, CB3 and CB4) at Plant 43-2, one (1) paint system (PS) at Plant 43-2, consisting of two (2) prime booths, and one (1) paint booth (PB1) at Plant 43-2 shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

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

D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

D.1.4 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer, and by Conditions D.1.1(a)(1) and (2). IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.5 VOC Emissions

Compliance with Condition D.1.1 shall be demonstrated within 30 days of the end of each week based on the average daily VOC usage for each week and the total volatile organic compound usage for the most recent twelve (12) month period.

D.1.6 Particulate Matter (PM)

The dry filters and water wash system for PM control shall be in operation at all times when the equipment exhausting to those control devices are in operation. Pursuant to CP 001-4127-00037, issued on October 17, 1995, the recirculation-type dust blow-off booth shall be operated at all times so that no PM escapes from the two (2) prime spray booths into the sanding room or into the ambient air. This shall be achieved by the use of replacement filters in the exhaust plenums, air recirculation and maintenance of negative pressure inside the dust blow off booth.

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

D.1.7 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 two (2) lamination and gel coat booths at Plant 43-1 (PC1 and PC2), one (1) spray booth at Plant 43-1 (GB2), one (1) spray booth (LB1) at Plant 43-1, two (2) spray booths (SB1 and P1) at Plant 43-1, three (3) gel booths (GB1, GB2 and GB3) at Plant 43-2, four (4) chop booths (CB1, CB2, CB3 and CB4) at Plant 43-2, and one (1) paint booth (PB1) at Plant 43-2, stacks (At Plant 43-1: B-1-1 through B-1-3, B-1-9, B-1-11 through B-1-14, C-1-1 through C-1-3, and P1; At Plant 43-2: B-1-1 through B-1-6, B-2-1 through B-2-14, C-3-1, C-3-2, C-3-4, C-3-5, B-4-1) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Daily inspections shall be performed to verify that the water level of the water wash system meets the manufacturer's recommended level. Water shall be kept free of solids and floating material that reduces the capture efficiency of the water pan. In addition, weekly observations shall be made of the overspray from prime booths 1 and 2 in the one (1) paint system (PS) at Plant 43-2, stacks (C-3-1, C-3-2, C-3-4 and C-3-5) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.