



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: August 17, 2005
RE: Thunderbird Products, Inc. / 001-21331-00031
FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval – Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-17-3-4 and 326 IAC 2, this permit modification is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-7-3 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) 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.

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of a Title V operating permit or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impracticable to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency
401 M Street
Washington, D.C. 20406

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



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

Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

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(800) 451-6027
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August 17, 2005

Mr. Jim Laux
Thunderbird Products, Inc.
2200 West Monroe Street
Decatur, IN 46733

Re: 001-21331
First Minor Permit Modification to:
Part 70 permit No.: T001-5903-00031

Dear Mr. Laux:

Thunderbird Products, Inc. was issued Part 70 operating permit T001-5903-00001 on October 14, 1999, for a fiberglass pleasure boat manufacturing facility. An application to modify the source was received on April 27, 2005. Pursuant to the provisions of 326 IAC 2-7-12 a minor permit modification to this permit is hereby approved as described in the attached Technical Support Document.

The modification consists of the descriptive and condition changes for the addition of a paint spray booth with a natural gas-fired heater, corrections to wording from previously issued permit modifications, and updates to the Emission Statement condition and the mailing address of IDEM, OAQ.

All other conditions of the permit shall remain unchanged and in effect. Please find a copy of the entire revised Part 70 permit with this letter.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Vickie Cordell, OAQ, 100 North Senate Avenue, Indianapolis, Indiana, 46204, or call at (800) 451-6027, press 0 and ask for Vickie Cordell or extension 3-1782, or dial (317) 233-1782.

Sincerely,

Original signed by

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments

vk

cc: File - Adams County
U.S. EPA, Region V
Adams County Health Department
Air Compliance Section Inspector: Greg Wingstrom
Compliance Data Section
Administrative and Development
Patrick Laux, Thunderbird Products, Inc.
Joe VanCamp, Cornerstone Environmental, Health and Safety, Inc.



Mitchell E. Daniels, Jr.
 Governor

Thomas W. Easterly
 Commissioner

100 North Senate Avenue
 Indianapolis, Indiana 46204
 (317) 232-8603
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**PART 70 OPERATING PERMIT
 MINOR PERMIT MODIFICATION
 OFFICE OF AIR QUALITY**

**Thunderbird Products, Inc.
 2200 West Monroe Street
 Decatur, Indiana 46733-3028**

(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.: T001-5903-00031	
Issued by: <i>(original signed by Janet G. McCabe)</i> Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date: October 14, 1999 Expiration Date: October 14, 2004
1 st Significant Permit Modification 001-11543-00031	Issuance Date: September 18, 2000
1 st Significant Source Modification 001-11987-00031	Issuance Date: October 6, 2000
1 st Administrative Amendment 001-11985-00031	Issuance Date: October 11, 2000
1 st Reopening 001-13125-00031	Issuance Date: November 29, 2001
1 st Minor Source Modification 001-15840-00031	Issuance Date: October 4, 2002
2 nd Significant Permit Modification 001-16599-00031	Issuance Date: January 10, 2003
3 rd Significant Permit Modification 001-17374-00031	Issuance Date: August 15, 2003
1 st Minor Permit Modification 001-21331-00031	Pages Amended: 4-10, 12, 14, 15, 17, 20-22, 25, 27, 28, 30-32, 35, 38-41, and 43
Issued by: Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: August 17, 2005

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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), and presented in the permit application. 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 source constructed in 1987 and manufactures fiberglass pleasure boats. The process involves fiberglass lamination, gel coating, wood/plastic working, assembly and spray painting.

Responsible Official: Patrick Laux
Source Address: 2200 West Monroe Street, Decatur, IN 46733-3028
Mailing Address: 2200 West Monroe Street, Decatur, IN 46733-3028
Phone Number: (260) 724-9111
SIC Code: 3732 - Boat building
County Location: Adams
County Status: Attainment for all criteria pollutants
Source Status: Part 70 Permit Program
Minor Source, under PSD or Emission Offset Rules;
Major Source, Section 112 of the Clean Air Act

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

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

- (a) Three (3) gel coating booths, identified as GSB4, GSB5, and GSB6, with a maximum capacity of 0.13 boats per hour per booth, using dry filters as control, and exhausting to stacks/vents #10, #11, and #12.
- (b) Four (4) stationary resin and foam filling booths, identified as, STB1, STB2, STB3, and STB4, with a maximum capacity of 0.005 boats per hour per booth, using dry filters as control, and exhausting to stacks/vents #13, #14, #15, and #16.
- (c) Six (6) IMRON paint spray booths, identified as SB1, SB2, SB3, SB4, SB5, and SB9, with a maximum capacity of 0.078 boats per hour per booth, using dry filters as control, and exhausting to stacks/vents #18, #19, #20, #21, #22, and #41.
- (d) Eight (8) lamination and foam filling areas, identified as: AV2, AV3, AV4, AV5, AV6, AV7, AV8 and AV9 with a maximum capacity of 0.13 boats per hour per area, using dry filters as control, and exhausting to stacks/vents #3, #4, #5, #6, #7, #8, #9 and #38.
- (e) Eight (8) stationary booths for gel coating/resin applications, identified as STB5 through STB12, with a maximum capacity of 0.025 boat units per hour per booth, each using dry filters as control, exhausting to stacks/vents #27, #28, #29, #30, #31, #32, #36, and #37, respectively.
- (f) Three (3) paint spray booths, identified as SB6, SB7, and SB8, with a maximum capacity of 0.025 boat units per hour per booth, each using dry filters as control, and each exhausting to stacks/vents #33, #34, and #35, respectively.
- (g) One (1) assembly, subassembly, upholstery area, with a maximum capacity of processing 0.25 boat units per hour, and exhausting to the atmosphere.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

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

- (a) Natural gas-fired combustion sources (fourteen space heaters H1 through H14, two (2) gel spray booth heaters, SBH1 and SBH2, and one (1) 3.0 MMBtu/hr paint spray booth heater) with heat input equal to or less than 10 MMBtu per hour each.
- (b) Eight (8) storage tanks with capacity less than or equal to 1000 gallons and annual throughput less than 12,000 gallons.
- (c) Cleaners and solvents characterized as follows: a) having a vapor pressure equal to or less than 2.0 kPa measured at 38 degrees C or b) having a vapor pressure equal to or less than 0.7 kPa measured at 20 degrees C.
- (d) Brazing, cutting, soldering, welding equipment and activities not resulting in HAPs emissions.
- (e) Three (3) acetone recovery systems with batch capacity less than 100 gallons.
- (f) Cut/trim, grinding, machining and wood working equipment and controlled with baghouses BH1 and BH2.
- (g) Other categories with emissions below insignificant thresholds:
 - (1) A wood/plastic working shop identified as BH3, equipped with one (1) baghouse for particulate control, with 99.95% efficiency.
 - (2) Activities related to research and development with VOC emissions below 15 pounds per day.
 - (3) Return services limited to minor patching with gel resin, paint touch-up.
 - (4) Boat cavity foam filling operations.
 - (5) Mold making and repair activities using tooling resins and gelcoats.
 - (6) Use of organic peroxide catalysts in resin and gelcoat application areas.
- (h) Paved and unpaved roads and parking lots with public access.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22).
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (USEPA) under 40 CFR 70.3 (Part 70 Applicability).

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

- (a) 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 Part 70 permit under 326 IAC 2-7.
- (b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled "Permit Shield."

B.2 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2 and 326 IAC 2-7 shall prevail.

B.3 Permit Term [326 IAC 2-7-5(2)]

This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

B.4 Enforceability [326 IAC 2-7-7(a)]

- (a) All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM.
- (b) Unless otherwise stated, terms and conditions of this permit, including any provisions to limit the source's potential to emit, are enforceable by the United States Environmental Protection Agency (U.S. EPA) and citizens under the Clean Air Act.

B.5 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.6 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

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

B.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

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

- (b) 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.
- (c) Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAQ, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAQ, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit constitutes a violation of the Clean Air Act and is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; or
 - (3) Denial of a permit renewal application.
- (b) 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.

B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, 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, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The 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 compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3);
 - (5) Any insignificant activity that has been added without a permit revision;
 - (6) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

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

B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]
[326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission units and associated emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date 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

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAQ, upon request and shall be subject to review and approval by IDEM, OAQ.

B.13 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.
- (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, 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: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted notice, either in writing or facsimile, of the emergency to:

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

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) 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 compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 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 materials of substantial economic value.

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

B.14 Permit Shield [326 IAC 2-7-15]

- (a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.
- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:
 - (1) The applicable requirements are included and specifically identified in this permit; or
 - (2) The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.
- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

- (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application.
- (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(7)]

B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

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

within ten (10) calendar days from the date of the discovery of the deviation.

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
 - (2) An emergency as defined in 326 IAC 2-7-1(12); or
 - (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
 - (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)]
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:
- (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.18 Permit Renewal [326 IAC 2-7-4]

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

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

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]

(1) A timely renewal application is one that is:

- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
- (B) 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.

(2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]

If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.

- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]

If IDEM, OAQ, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

Any such application should be certified by the “responsible official” as defined by rule 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.20 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)]
[326 IAC 2-7-12 (b)(2)]

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.21 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(b)]

The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:

- (a) For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.
- (b) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).

B.22 Operational Flexibility [326 IAC 2-7-20]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:
 - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any approval required by 326 IAC 2-1 has been obtained;
 - (3) The changes do not result in emissions which exceed the emissions allowable under 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

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 which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

- (b) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:
- (1) A brief description of the change within the source;
 - (2) The date on which the change will occur;
 - (3) Any change in emissions; and
 - (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.23 Construction Permit Requirement [326 IAC 2]

Except as allowed by Indiana P.L. 130-1996 Section 12, as amended by P.L. 244-1997, modification, construction, or reconstruction shall be approved as required by and in accordance with 326 IAC 2.

B.24 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.
[326 IAC 2-7-6(6)]
 - (1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAQ, or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAQ, nor an authorized representative, may disclose the information unless and until IDEM, OAQ, makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]
 - (2) The Permittee, and IDEM, OAQ, acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

B.25 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

The application which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.26 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. 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 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

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

- C.1 **Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2(e)]**
Pursuant to 326 IAC 6-3-2(e), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- C.2 **Opacity [326 IAC 5-1]**
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:
- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- C.3 **Open Burning [326 IAC 4-1] [IC 13-17-9]**
The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.
- C.4 **Incineration [326 IAC 4-2][326 IAC 9-1-2]**
The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.
- C.5 **Fugitive Dust Emissions [326 IAC 6-4]**
The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.
- C.6 **Operation of Equipment [326 IAC 2-7-6(6)]**
All air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment is in operation.
- C.7 **Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]**
- (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

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory 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) **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 that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

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

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods 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

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAQ within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAQ, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

C.9 Compliance Schedule [326 IAC 2-7-6(3)]

The Permittee:

- (a) Has certified that all facilities at this source are in compliance with all applicable requirements; and
- (b) Has submitted a statement that the Permittee will continue to comply with such requirements; and
- (c) Will continue to comply with such requirements that become effective during the term of this permit.

C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee may extend the compliance schedule 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

in writing, prior to the end of the ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.11 Maintenance of Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

- (a) In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour until such time as the continuous monitor is back in operation.

- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.12 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the applicable requirements of this permit shall be performed, according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

C.13 Pressure Gauge Specifications

Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.

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

C.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

- (b) These ERPs shall be submitted for approval to:

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

within ninety (90) days after the date of issuance of this permit.

The ERP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP. If after this time, the Permittee does not submit an approvable ERP, then IDEM, OAQ, shall supply such a plan.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

- (f) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.15 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

- (a) Submit:
- (1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
 - (2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
 - (3) A verification to IDEM, OAQ, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.
- (b) Provide annual certification to IDEM, OAQ, that the Risk Management Plan is being properly implemented.

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.16 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5][326 IAC 2-7-6] [326 IAC 1-6]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
- (1) This condition;
 - (2) The Compliance Determination Requirements in Section D of this permit;
 - (3) The Compliance Monitoring Requirements in Section D of this permit;
 - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
 - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAQ upon request and shall be subject to review and approval by IDEM, OAQ. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :
 - (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
 - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure

to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.

- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
- (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;
 - (3) An automatic measurement was taken when the process was not operating; or
 - (4) The process has already returned to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
[326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAQ shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAQ within thirty (30) days of receipt of the notice of deficiency. IDEM, OAQ reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (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. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

C.18 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6][326 IAC 2-7-19 (e)]

(a) In accordance with the compliance schedule specified in 326 IAC 2-6-3(b)(1), starting in 2007 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

- (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
- (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(32) ("Regulated pollutant which is used only for purposes of Section 19 of this rule") from the source, for purposes of fee assessment.

The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

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

(b) The emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

C.19 Monitoring Data Availability

- (a) With the exception of performance tests conducted in accordance with Section C-Performance Testing. All observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.20 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

- (a) Records of all required monitoring data and support information 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 kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAQ, representative, 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 (or local agency) makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or local agency within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
- (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
- (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance

C.21 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported. The Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any report shall be submitted within thirty (30) days of the end of the reporting period. The report does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports. The Emergency/Deviation Occurrence Report does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

SECTION D.1

FACILITY OPERATION CONDITIONS

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

- (1) Three (3) gel coating booths, identified as GSB4, GSB5, and GSB6, with a maximum capacity of 0.13 boats per hour per booth, using dry filters as control, and exhausting to stacks/vents #10, #11, and #12.
- (2) Four (4) stationary resin and foam filling booths, identified as, STB1, STB2, STB3, and STB4, with a maximum capacity of 0.005 boats per hour per booth, using dry filters as control, and exhausting to stacks/vents #13, #14, #15, and #16.
- (3) Six (6) IMRON paint spray booths, identified as, SB1, SB2, SB3, SB4, SB5, and SB9, with a maximum capacity of 0.078 boats per hour per booth, using dry filters as control, and exhausting to stacks/vents, #18, #19, #20, #21, #22 and #41.
- (4) Eight (8) lamination and foam filling areas, identified as: AV2, AV3, AV4, AV5, AV6, AV7, AV8 and AV9 with a maximum capacity of 0.13 boats per hour per area, using dry filters as control, and exhausting to stacks/vents, #3, #4, #5, #6, #7, #8, #9 and #38.

(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) - General Reduction [326 IAC 8-1-6]

Pursuant to the construction permit CP (01) 1658 issued in October 20, 1987, this source is subject to BACT requirements for VOC emissions. The current BACT requirements for fiberglass operations have been determined to be similar to the MACT determination under 326 IAC 2-1-3.4. Therefore, pursuant to the MACT determination under 326 IAC 2-1-3.4 and Construction Permit CP (01) 1658 issued in October 20, 1987, operating conditions for the fiberglass and painting operations shall be the following:

- (a) Monthly usage by weight, volatile organic content, method of application, and other emission reduction techniques for each gel coat, resin, and paint 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", Composites Fabricators Association, July 23, 2001, or its updates, and shall not exceed 32.3% styrene emitted per weight of gel coat applied and 17.7% styrene emitted per weight of resin applied. For the purposes of these emission calculations, monomer in resins and gel coats that is not styrene shall be considered as styrene on an equivalent weight basis. Emission factors for methyl methacrylate may be obtained from the "Unified Emission Factors for Open Molding of Composites" which allows for specific emission determinations for methyl methacrylate.

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

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

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

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

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

- (d) Flow coaters, a type of non-spray application technology of a design and specifications to be approved by IDEM, OAQ, shall be used in the following manner:
- (1) to apply 50% of all neat resins within 6 months of commencement of operation.
 - (2) to apply 100% of all neat resins used within 1 year of commencement of operation.

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

- (e) Optimized spray techniques according to a manner approved by IDEM shall be used for gel coats and filled resins (where fillers are required for corrosion or fire retardant purposes) at all times. Optimized spray techniques include, but are not limited to, the use of airless, air-assisted airless, high volume low pressure (HVLP), or other spray applicators demonstrated to the satisfaction of IDEM, OAQ, to be equivalent to the spray applicators listed above.

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

- (f) The listed work practices shall be followed:
- (1) To the extent possible, a non-VOC, non-HAP solvent shall be used for cleanup.

- (2) Cleanup solvent containers used to transport solvent from drums to work stations shall be closed containers having soft gasketed spring-loaded closures.
- (3) Cleanup rags saturated with solvent shall be stored, transported, and disposed of in containers that are closed tightly.
- (4) The spray guns used shall be the type that can be cleaned without the need for spraying the solvent into the air.
- (5) All solvent sprayed during cleanup or resin changes shall be directed into containers. Such containers shall be closed as soon as solvent spraying is complete. The waste solvent shall be handled in such a manner that evaporation is minimized, and managed in accordance with applicable solid or hazardous waste requirements.
- (6) Storage containers used to store VOC- and/or HAP- containing materials shall be kept covered when not in use.

D.1.2 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

Emission units listed in sections D.1, D.2, and D.3 shall be limited to less than 244 tons of VOC emissions per twelve consecutive month period, with compliance determined at the end of each month. Compliance with this condition shall be based on the conditions of D.1.1 (a) and (b).

Any change or modification which may increase VOC emissions from units listed in D.1, D.2, and D.3 to 244 tons per 12 consecutive month period, or greater, shall require OAQ approval before such change can take place.

Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.1.3 Particulate Matter (PM) [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), overspray shall be controlled by a dry particulate filter, waterwash, or an equivalent control device. The source shall operate the control device in accordance with manufacturer's specifications.

D.1.4 Preventive Maintenance Plan [326 IAC 2-7-4(c)(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.1.5 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limits specified in Conditions D.1.3. shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.6 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.1.1 and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. 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.1.7 VOC Emissions

Compliance with Condition D.1.2 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.8 Particulate Matter (PM)

Pursuant to PC (01) 1658 issued in October 20, 1987, the dry filters for PM control shall be in operation at all times when these nine (9) booths identified as STB1, STB2, STB3, STB4, SB1, SB2, SB3, SB4, and SB5 are in operation.

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

D.1.9 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters on Stationary Booth, Paint Spray Booth and Lamination Area Station. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks associated with STB1, STB2, STB3, STB4, SB1, SB2, SB3, SB4, SB5, and SB9, and from Lamination Area Stacks associated with AV2, AV3, AV4, AV5, AV6, AV7, and AV8 while one or more of the units 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) Monthly inspections shall be performed of the coating and lamination emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. 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.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

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

D.1.10 Record Keeping Requirements

- (a) To document compliance with Condition D.1.2, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the volatile organic compound emission limit established in Condition D.1.2.
 - (1) The usage by weight and monomer content of each resin and gel coat, and the amount and VOC content of each paint and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used;
 - (2) A log of the monthly usage;
 - (3) Method of application and other emission reduction techniques for each resin and gel coat used;
 - (4) The calculated total volatile organic compound emissions from resin and gel coat, paint, and solvent use for each month.
- (b) To document compliance with Conditions D.1.9, the Permittee shall maintain a log of daily overspray observations, daily and weekly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.11 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.2 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.2 FACILITY OPERATION CONDITIONS

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

- (1) Eight (8) stationary booths for gel coating/resin applications, identified as STB5 through STB12, with a maximum capacity of 0.025 boat units per hour per booth, each using dry filters as control, exhausting to stacks/vents #27, #28, #29, #30, #31, #32, #36, and #37, respectively.
- (2) Three (3) paint spray booths, identified as SB6, SB7, and SB8, with a maximum capacity of 0.025 boat units per hour per booth, each using dry filters as control, and each exhausting to stacks/vents #33, #34, and #35, respectively.

(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.2.1 New Source Toxics Control [326 IAC 2-4.1-1][326 IAC 20][40 CFR 63 Subpart VVVV]

Pursuant to the New Source Toxics Control under 326 IAC 2-4.1-1, operating conditions for the gel coating/resin stationary booths are listed below. Adherence to these conditions will also satisfy 326 IAC 8-1-6 (BACT), 326 IAC 20 and 40 CFR 63 Subpart VVVV (NESHAP for Boat Manufacturing).

- (a) Use of resins, gel coats and clean-up solvents, as well as VOC delivered to the applicators, shall be limited such that the total combined hazardous air pollutant (HAP) emissions are limited to less than one hundred (100) tons per twelve (12) consecutive month period, with compliance determined for the end of each month. Compliance with this limit shall be determined based upon the following criteria:
 - (1) Monthly usage by weight, monomer content, method of application, and other emission reduction techniques for each gel coat and resin shall be recorded. VOC emissions shall be calculated by multiplying the usage of each gel coat and resin by the emission factor that is appropriate for the monomer content, method of application, and other emission reduction techniques for each gel coat and resin, and summing the emissions for all gel coats and resins. Emission factors shall be obtained from the reference approved by IDEM, OAQ.
 - (2) Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA-approved form, emission factors shall be taken from the following reference approved by IDEM, OAQ: "Unified Emission Factors for Open Molding of Composites", Composites Fabricators Association, July 23, 2001, or its updates, and shall not exceed 32.3% styrene emitted per weight of gel coat applied and 17.7% styrene emitted per weight of resin applied. For the purposes of these emission calculations, monomer in resins and gel coats that is not styrene shall be considered as styrene on an equivalent weight basis. Emission factors for methyl methacrylate may be obtained from the "Unified Emission Factors for Open Molding of Composites" which allows for specific emission determinations for methyl methacrylate.
- (b) Resins and gel coats used, including filled resins and tooling resins and gel coats, shall be limited to maximum monomer contents of 35 percent (35%) by weight for resins and gel coats or their equivalent on an emissions mass basis. Monomer contents shall be calculated on a neat basis, i.e., excluding any filler. Compliance with these monomer content limits shall be demonstrated on a monthly basis.

The use of resins and gel coats with monomer contents lower than 35%, and/or

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

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

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

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

- (c) Flow coaters, a type of non-spray application technology of a design and specifications to be approved by IDEM, OAQ, shall be used.

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

- (d) Optimized spray techniques according to a manner approved by IDEM shall be used for gel coats and filled resins (where fillers are required for corrosion or fire retardant purposes) at all times. Optimized spray techniques include, but are not limited to, the use of airless, air-assisted airless, high volume low pressure (HVLP), or other spray applicators demonstrated to the satisfaction of IDEM, OAQ, to be equivalent to the spray applicators listed above.

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

- (e) The listed work practices shall be followed:

- (1) To the extent possible, a non-VOC, non-HAP solvent shall be used for cleanup.
- (2) Cleanup solvent containers used to transport solvent from drums to work stations shall be closed containers having soft gasketed spring-loaded closures.
- (3) Cleanup rags saturated with solvent shall be stored, transported, and disposed of in containers that are closed tightly.
- (4) The spray guns used shall be the type that can be cleaned without the need for spraying the solvent into the air.

- (5) All solvent sprayed during cleanup or resin changes shall be directed into containers, such containers shall be closed as soon as solvent spraying is complete and the waste solvent shall be disposed of in such a manner that evaporation is minimized.
- (6) Storage containers used to store VOC- and/or HAP- containing materials shall be kept covered when not in use.

D.2.2 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

Emission units listed in sections D.1, D.2, and D.3 shall be limited to less than 244 tons of VOC emissions per twelve consecutive month period, with compliance determined at the end of each month. Compliance with this condition shall be based on the conditions of D.2.1 (a) and (b).

Any change or modification which may increase VOC emissions from units listed in D.1, D.2, and D.3 to 244 tons per 12 consecutive month period, or greater, shall require OAQ approval before such change can take place.

Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.2.3 Particulate Matter (PM) [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), overspray shall be controlled by a dry particulate filter, waterwash, or an equivalent control device. The Permittee shall operate the control device in accordance with manufacturer's specifications.

D.2.4 New Facilities: General Reduction Requirements [326 IAC 8-1-6]

Any change or modification which would increase the potential to emit VOC from the paint booths (SB6, SB7 and SB8) to twenty-five (25) tons per year or more, shall obtain prior approval from IDEM, OAQ and shall be subject to the requirements of 326 IAC 8-1-6.

D.2.5 Preventive Maintenance Plan [326 IAC 2-7-4(c)(9)]

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

Compliance Determination Requirements

D.2.6 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC limits specified in D.2.2, PM limits specified in D.2.3. and HAPs limits specified in D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.2.7 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.2.1 and D.2.2 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. 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.2.8 HAP Emissions

Compliance with Condition D.2.1(a) shall be demonstrated within 30 days of the end of each month based on the total hazardous air pollutant emissions for the most recent twelve (12) month period.

D.2.9 VOC Emissions

Compliance with Condition D.2.2 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

D.2.10 Particulate Matter (PM)

The dry filters for PM control shall be in operation at all times when the booths are in operation.

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

D.2.11 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 associated with gel coating or resin application 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) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. 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.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

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

D.2.12 Record Keeping Requirements

- (a) To document compliance with Condition D.2.1(a), 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 hazardous air pollution (HAP) emission limit established in Condition D.2.1.
 - (1) The usage by weight and monomer content of each resin, gel coat, and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used;
 - (2) A log of the month of use;
 - (3) Method of application and other emission reduction techniques for each resin and gel coat used;
 - (4) The individual HAP and combined HAP usage for each month; and
 - (5) The weight of individual HAP and combined HAPs emitted for each compliance period.

- (b) To document compliance with Conditions D.2.2 and D.2.4, 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 VOC usage limits and/or the VOC emission limits established in Conditions D.2.2 and D.2.4.
 - (1) The amount, and the VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the month(s) of use;
 - (3) The cleanup solvent usage for each month;
 - (4) The total VOC usage for each month; and
 - (5) The weight of VOCs emitted for each compliance period.
- (c) To document compliance with Conditions D.2.3 and D.2.10, the Permittee shall maintain a log of daily overspray observations, daily and weekly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.13 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.2.1 and D.2.2 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.3 FACILITY OPERATION CONDITIONS

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

- (1) One (1) assembly, subassembly, upholstery area, with a maximum capacity of processing 0.25 boat units per hour, and exhausting to the atmosphere.

(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.3.1 Volatile Organic Compounds (VOC) - General Reduction [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6, the source shall comply with the following best available control technology (BACT) determination:

- (a) The VOC content of the adhesives and sealants applied shall not exceed 9.5 pounds per gallon less water;
- (b) The total VOC input to the assembly, subassembly, upholstery area operations, including any cleanup solvents, shall not exceed 55.9 tons per twelve (12) consecutive month period, with compliance determined for the end of each month.
- (c) Proper equipment cleanup and maintenance shall be performed, including containment of any solvent used during equipment cleanup. Such containers shall be closed as soon as cleanup is complete, and any waste solvent shall be disposed of in such a manner that minimizes evaporation.

D.3.2 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

Emission units listed in sections D.1, D.2, and D.3 shall be limited to less than 244 tons of VOC emissions per twelve consecutive month period, with compliance determined at the end of each month. Compliance with this condition shall be based on the conditions of D.3.1 (a) and (b).

Any change or modification which may increase VOC emissions from units listed in D.1, D.2, and D.3 to 244 tons per 12 consecutive month period, or greater, shall require OAQ approval before such change can take place.

Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.3.3 Preventive Maintenance Plan [326 IAC 2-7-4(c)(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.3.4 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC limits specified in D.3.1 and D.3.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.3.5 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.3.1 and D.3.2 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. 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.3.6 VOC Emissions

Compliance with Conditions D.3.1 and D.3.2 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

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

D.3.7 Record Keeping Requirements

- (a) To document compliance with Conditions D.3.1 and D.3.2, 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 VOC usage limits and/or the VOC emission limits established in Condition D.3.2.
- (1) The amount, and the VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the month(s) of use;
 - (3) The cleanup solvent usage for each month;
 - (4) The total VOC usage for each month; and
 - (5) The weight of VOCs emitted for each compliance period.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.3.8 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.3.2 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

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

Part 70 Quarterly Report - VOC

Source Name: Thunderbird Products, Inc.
 Source Address: 2200 West Monroe Street, Decatur, Indiana 46733-3028
 Mailing Address: 2200 West Monroe Street, Decatur, Indiana 46733-3028
 Part 70 Permit No.: T001-5903-00031
 Facility: Emission units listed in D.1, D.2, and D.3
 Parameter: VOC
 Limit: less than 244 tons per twelve (12) consecutive month period

- (a) When applying gel coats and resins, VOC emissions shall be calculated by multiplying the material usage by the appropriate emission factor based on the monomer content, method of application, and other emission reduction techniques, and summing the emissions for all gel coats and resins.
- (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 for the gel coat and resin applications shall be taken from the following reference approved by IDEM, OAQ: "Unified Emission Factors for Open Molding of Composites", Composites Fabricators Association, July 23, 2001, or its updates. For the purposes of these emission calculations, monomer in resins and gel coats that is not styrene shall be considered as styrene on an equivalent weight basis. Emission factors for methyl methacrylate may be obtained from the "Unified Emission Factors for Open Molding of Composites" which allows for specific emission determinations for methyl methacrylate.
- (c) When applying VOC solvents other than gel coats and resins, VOC emissions shall be calculated using an emission factor of 2,000 pounds of VOC emitted per ton of VOC used.

YEAR: _____

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

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

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

A certification is not required for this report.

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

Part 70 Quarterly Report - HAPs

Source Name: Thunderbird Products, Inc.
 Source Address: 2200 West Monroe Street, Decatur, IN 46733-3028
 Mailing Address: 2200 West Monroe Street, Decatur, IN 46733-3028
 Part 70 Permit No.: T001-5903-00031
 Facility: STB5 through STB12
 Parameter: Single and Combined Hazardous Air Pollutants (HAPs)
 Limit: The hazardous air pollutant (HAP) input usage shall be limited such that total combined HAP emissions are limited to less than 100 tons per twelve (12) consecutive month period based on the following:

- (a) When applying gel coats and resins, hazardous air pollutant (HAPs) emissions shall be calculated by multiplying the material usage by the appropriate emission factor based on the monomer content, method of application, and other emission reduction techniques, and summing the emissions for all gel coats and resins.
- (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 for the gel coat and resin applications shall be taken from the following reference approved by IDEM, OAQ: "Unified Emission Factors for Open Molding of Composites", Composites Fabricators Association, July 23, 2001, or its updates. For the purposes of these emission calculations, monomer in resins and gel coats that is not styrene shall be considered as styrene on an equivalent weight basis. Emission factors for methyl methacrylate may be obtained from the "Unified Emission Factors for Open Molding of Composites" which allows for specific emission determinations for methyl methacrylate.
- (c) When applying hazardous air pollutants (HAPs) solvents other than gel coats and resins, hazardous air pollutants (HAPs) emissions shall be calculated using an emission factor of 2,000 pounds of hazardous air pollutants (HAPs) emitted per ton of VOC used.

YEAR: _____

Month	Combined HAPs Emitted This Month (tons)		Combined HAPs Emitted Previous 11 Months (tons)		Combined HAPs Emitted 12 Month Total (tons)	
Month 1						
Month 2						
Month 3						

- 9 No deviation occurred in this quarter.
- 9 Deviation(s) occurred in this quarter.
- 9 Deviation has been reported on: _____

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

A certification is not required for this report.

State Form 47738 (5-96)

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

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Thunderbird Products, Inc.
Source Address: 2200 West Monroe Street, Decatur, Indiana 46733-3028
Mailing Address: 2200 West Monroe Street, Decatur, Indiana 46733-3028
Part 70 Permit No.: T001-5903-00031

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) _____
- 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 DATA SECTION
100 North Senate Avenue
Indianapolis, Indiana 46204
Phone: 317-233-5674
Fax: 317-233-6865

PART 70 OPERATING PERMIT
EMERGENCY/DEVIATION OCCURRENCE REPORT

Source Name: Thunderbird Products, Inc.
Source Address: 2200 West Monroe Street, Decatur, Indiana 46733-3028
Mailing Address: 2200 West Monroe Street, Decatur, Indiana 46733-3028
Part 70 Permit No.: T001-5903-00031

This form consists of 2 pages

Page 1 of 2

Check either No. 1 or No.2	
<input checked="" type="radio"/> 1.	This is an emergency as defined in 326 IAC 2-7-1(12)
<input type="checkbox"/> C	The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
<input type="checkbox"/> C	The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
<input checked="" type="radio"/> 2.	This is a deviation, reportable per 326 IAC 2-7-5(3)(c)
<input type="checkbox"/> C	The Permittee must submit notice in writing within ten (10) calendar days

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/Deviation:
Describe the cause of the Emergency/Deviation:

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

Page 2 of 2

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
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: _____

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

**PART 70 OPERATING PERMIT
QUARTERLY COMPLIANCE REPORT**

Source Name: Thunderbird Products, Inc.
Source Address: 2200 West Monroe Street, Decatur, Indiana 46733-3028
Mailing Address: 2200 West Monroe Street, Decatur, Indiana 46733-3028
Part 70 Permit No.: T001-5903-00031

Months: _____ to _____ Year: _____

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

NO DEVIATIONS OCCURRED THIS REPORTING PERIOD

THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

Compliance Monitoring Requirement (e.g. Permit Condition D.1.3)	Number of Deviations	Date of each Deviation

Form Completed By: _____
Title/Position: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

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

**Addendum to the
Technical Support Document (TSD) for a Part 70 Minor Permit Modification**

Source Description

Source Name:	Thunderbird Products, Inc.
Source Location:	2200 West Monroe Street, Decatur, IN 46733
County:	Adams
SIC Code:	3732
Operation Permit No.:	T 001-5903-00031
Operation Permit Issuance Date:	October 14, 1999
Minor Permit Modification No.:	001-21331-00031
Permit Reviewer:	Vickie Cordell

On June 13, 2005, the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) had a notice published in Decatur Daily Democrat in Decatur, Indiana, stating that Thunderbird Products, Inc. had applied for a Minor Permit Modification to their Part 70 Permit to add a paint spray booth with a natural gas-fired heater. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed approval and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on the draft permit.

On June 14, 2005, Joe VanCamp of Cornerstone Environmental, Health and Safety, Inc., on behalf of Thunderbird Products, Inc., submitted two comments on the draft Permit Modification. The following is a summary of the comments. In the responses, additions to the permit are bolded for emphasis; the language with a line through it has been deleted.

Comment 1

The first page of the permit states "Significant Permit Modification" in the title instead of "Minor Permit Modification".

Response 1

The title has been corrected as shown.

**PART 70 OPERATING PERMIT
~~SIGNIFICANT~~ **MINOR** PERMIT MODIFICATION
OFFICE OF AIR QUALITY**

Comment 2

The new paint spray booth (EU # SB9) is not specifically identified under Condition D.1.9(a) of the draft MPM. This is the compliance monitoring condition where the dry filters and exhaust stack are inspected for the presence of overspray on a daily, weekly, and monthly basis. Please include this booth under this condition if the compliance monitoring will be required.

Response 2

Condition D.1.9(a) has been revised as shown.

D.1.9 Monitoring

-
- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters on Stationary Booth, Paint Spray Booth and Lamination Area Station. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks associated with STB1, STB2, STB3, STB4, SB1, SB2, SB3, SB4, ~~and SB5~~, **and SB9**, and from Lamination Area Stacks associated with AV2, AV3, AV4, AV5, AV6, AV7, and AV8 while one or more of the units 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.

Indiana Department of Environmental Management Office of Air Quality

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

Source Background and Description

Source Name:	Thunderbird Products, Inc.
Source Location:	2200 West Monroe Street, Decatur, IN 46733
County:	Adams
SIC Code:	3732
Operation Permit No.:	T 001-5903-00031
Operation Permit Issuance Date:	October 14, 1999
Minor Permit Modification No.:	001-21331-00031
Permit Reviewer:	Vickie Cordell

The Office of Air Quality (OAQ) has reviewed a modification application submitted April 27, 2005, from Thunderbird Products, Inc. relating to the construction and operation of the following emission units and pollution control devices:

One (1) IMRON paint spray booth, identified as SB9, with a maximum capacity of 0.078 boats per hour, using dry filters as control, and exhausting to stack/vent #41.

Insignificant Activity: Natural gas-fired combustion sources with heat input equal to less than 10 MMBtu per hour each: One (1) 3.0 MMBtu/hr paint spray booth heater.

Existing Approvals

The source was issued a Part 70 Operating Permit 001-5903-00031 on October 14, 1999. The source has since received the following:

- (a) First Significant Permit Modification No.: 001-11543, issued on September 18, 2000;
- (b) First Significant Source Modification No.: 001-11987, issued on October 6, 2000;
- (c) First Administrative Amendment No.: 001-11985, issued on October 11, 2000;
- (d) First Reopening No.: 001-13125, issued on November 29, 2001;
- (e) First Minor Source Modification No.: 001-15840, issued on October 4, 2002;
- (f) Second Significant Permit Modification No.: 001-16599, issued on January 10, 2003; and
- (g) Third Significant Permit Modification No.: 001-17374, issued on August 15, 2003.

The source applied for a Part 70 Operating Permit Renewal on December 8, 2003.

Recommendation

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

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

An application for the purposes of this review was received on April 27, 2005. Additional information was received on May 27, May 31, June 1, and June 2, 2005.

Emission Calculations

The calculations submitted by the applicant have been verified and found to be accurate and correct. These calculations are provided in Appendix A of this document.

Potential To Emit of the Modification

The table below summarizes the potential to emit of the new emission units with no additional controls. Use of particulate control is required for the spray booth by 326 IAC 6-3 but was not included in the calculations submitted.

Process/facility	Potential to Emit (tons/year)						
	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Spray Booth SB9	0.42			3.09			0.61
gas-fired heater	0.10	0.10	0.01	0.07	1.10	1.31	

This modification to an existing minor stationary source is not major because the emission increase is less than the PSD significant levels, and the VOC emissions from the spray paint booth SB9 will be included in the existing source-wide VOC limit of 244 tons per year. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

Justification for Modification

The Part 70 Operating permit is being modified through a Part 70 Minor Permit Modification, MPM 001-21331-00031, pursuant to 326 IAC 27-12(b).

County Attainment Status

The source is located in Adams County.

Pollutant	Status
PM-10	attainment
PM-2.5	attainment
SO ₂	attainment
NO ₂	attainment
1-hour Ozone	attainment
8-hour Ozone	attainment
CO	attainment
Lead	attainment

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

Recommendation

The following changes are being proposed to the Part 70 permit (deletions are shown in ~~strikeout~~ font and additions are in **bold**). The revised conditions do include changes made in previous revisions to the permit. Additional amendments were made to update the mailing address for IDEM, OAQ, and the Emission Reporting condition.

- (a) The following changes were made for the addition of the IMRON paint spray booth SB9 and the associated booth heater, and to clarify and correct wording in some of the Section D conditions regarding the source-wide VOC limit.

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:

- (c) ~~Five (5)~~ **Six (6)** IMRON paint spray booths, identified as SB1, SB2, SB3, SB4, ~~and SB5,~~ **and SB9**, with a maximum capacity of 0.078 boats per hour per booth, using dry filters as control, and exhausting to stacks/vents #18, #19, #20, #21, ~~and #22,~~ **and #41**.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

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

- (a) Natural gas-fired combustion sources (fourteen space heaters H1 through H14, ~~and two~~ (2) gel spray booth heaters, SBH1 and SBH2, **and one (1) 3.0 MMBtu/hr paint spray booth heater**) with heat input equal to or less than 10 MMBtu per hour each.

SECTION D.1

FACILITY OPERATION CONDITIONS

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

- (c) ~~Five (5)~~ **Six (6)** IMRON paint spray booths, identified as SB1, SB2, SB3, SB4, ~~and SB5,~~ **and SB9**, with a maximum capacity of 0.078 boats per hour per booth, using dry filters as control, and exhausting to stacks/vents, #18, #19, #20, #21, ~~and #22~~ **and #41**.

D.1.2 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

Emission units listed in sections D.1, D.2, and D.3 shall be limited to **less than** 244 tons of VOC emissions per twelve consecutive month period, with compliance determined at the end of each month. Compliance with this condition shall be based on the conditions of D.1.1 (a) and (b).

Any change or modification which may increase VOC emissions from units listed in D.1, D.2, and D.3 to 244 tons per 12 consecutive month period, or greater, shall require OAQ approval before such change can take place.

Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.1.6 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.1.1 **and** D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. 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.1.10 Record Keeping Requirements

- (a) To document compliance with Condition D.1.2(a), the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the volatile organic compound emission limit established in Condition D.1.2.
- (1) The usage by weight and monomer content of each resin and gel coat, **and the amount and VOC content of each paint and solvent used**. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used;
 - (2) A log of the monthly usage;
 - (3) Method of application and other emission reduction techniques for each resin and gel coat used;
 - (4) The calculated total volatile organic compound emissions from resin, ~~and~~ gel coat, **paint, and solvent** use for each month.

D.2.2 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

Emission units listed in sections D.1, D.2, and D.3 shall be limited to **less than** 244 tons of VOC emissions per twelve consecutive month period, with compliance determined at the end of each month. Compliance with this condition shall be based on the conditions of D.2.1 (a) and (b).

Any change or modification which may increase VOC emissions from units listed in D.1, D.2, and D.3 to 244 tons per 12 consecutive month period, or greater, shall require OAQ approval before such change can take place.

Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.2.7 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions **D.2.1** and D.2.2 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. 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.3.2 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

Emission units listed in sections D.1, D.2, and D.3 shall be limited to **less than** 244 tons of VOC emissions per twelve consecutive month period, with compliance determined at the end of each month. Compliance with this condition shall be based on the conditions of D.3.1 (a) and (b).

Any change or modification which may increase VOC emissions from units listed in D.1, D.2, and D.3 to 244 tons per 12 consecutive month period, or greater, shall require OAQ approval before such change can take place.

Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.3.5 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.3.1 **and D.3.2** 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. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

- (b) IDEM is phasing out the use of post office boxes for incoming mail. The mailing address for IDEM OAQ has been revised in Conditions B.8 (Duty to Supplement and Provide Information), B.11 (Annual Compliance Certification), B.12 Preventive Maintenance Plan, B.13 (Emergency Provisions), B.16 (Deviations from Permit Requirements and Conditions), B.18 (Permit Renewal),

B.19 (Permit Amendment or Modification), B.22 (Operational Flexibility), B.25 (Transfer of Ownership or Operational Control), C.7 (Asbestos Abatement Projects), C.8 (Performance Testing), C.10 (Compliance Monitoring), C.14 (Emergency Reduction Plans), C.18 (Emission Statement), and C.21 (General Reporting Requirements), and on the Emergency/Deviation Occurrence Report form.

100 North Senate Avenue, ~~P. O. Box 6015~~
Indianapolis, Indiana ~~46206-6015~~ **46204**

100 North Senate Avenue
~~P.O. Box 6015~~
Indianapolis, Indiana ~~46206-6015~~ **46204**

- (c) The permit has been updated to incorporate the revisions to 326 IAC 2-6 (Emission Reporting) which became effective on March 27, 2004. The emission statement will be due every three years according to the compliance schedule specified in 326 IAC 2-6-3.

C.18 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6][326 IAC 2-7-19 (e)]

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- (a) ~~The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by **(April 15 or July 1)** of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:~~

In accordance with the compliance schedule specified in 326 IAC 2-6-3(b)(1), starting in 2007 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

- (1) ~~Indicate estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting)~~ **all pollutants listed in 326 IAC 2-6-4(a);**
- (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(32) ("Regulated pollutant which is used only for purposes of Section 19 of this rule") from the source, for purposes of fee assessment.

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

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

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

- (b) ~~The annual~~ emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) The Quarterly Report form for HAPs was revised to update the reference document cited. This change was described in the TSD Addendum for Significant Permit Modification 17374 and the

update was made in two permit conditions and the Quarterly Report form for VOCs, but the Quarterly Report for HAPs was not revised. The title of each of the Quarterly Report forms has been amended to distinguish between the VOC report and the HAPs report, and the Table of Contents was revised to list the two Quarterly Reports separately.

Quarterly Report Form - **VOC**.....40
Quarterly Report Form - **HAPs**.....41

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

Part 70 Quarterly Report - **VOC**

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

Part 70 Quarterly Report - **HAPs**

Source Name: Thunderbird Products, Inc.
Source Address: 2200 West Monroe Street, Decatur, IN 46733-3028
Mailing Address: 2200 West Monroe Street, Decatur, IN 46733-3028
Part 70 Permit No.: T001-5903-00031
Facility: STB5 through STB12
Parameter: Single and Combined Hazardous Air Pollutants (HAPs)

Limit: The hazardous air pollutant (HAP) input usage shall be limited such that total combined HAP emissions are limited to less than 100 tons per twelve (12) consecutive month period based on the following:

- (a) When applying gel coats and resins, hazardous air pollutant (HAPs) emissions shall be calculated by multiplying the material usage by the appropriate emission factor based on the monomer content, method of application, and other emission reduction techniques, and summing the emissions for all gel coats and resins.
- (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 for the gel coat and resin applications shall be taken from the following reference approved by IDEM, OAQ: ~~"CFA Emission Models for the Reinforced Plastics Industries,"~~ **"Unified Emission Factors for Open Molding of Composites"**, Composites Fabricators Association, ~~February 28, 1998~~ (updated as the **"Unified Emission Factors for Open Molding of Composites"** ("CFA Factors", April 1999) **July 23, 2001, or its updates**. For the purposes of these emission calculations, monomer in resins and gel coats that is not styrene shall be considered as styrene on an equivalent weight basis. Emission factors for methyl methacrylate may be obtained from the "Unified Emission Factors for Open Molding of Composites" which allows for specific emission determinations for methyl methacrylate.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) applicable to this proposed modification.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this proposed modification.
- (c) There are no Prevention of Significant Deterioration (PSD) requirements (326 IAC 2-2 and 40 CFR 52.21) applicable to this proposed modification. The additional VOC emissions from the new spray paint booth SB9 will be included in the existing source-wide VOC limit of 244 tons per year for the significant activities to maintain the current status as a PSD minor source.

State Rule Applicability - Entire Source

326 IAC 2-2 (PSD Minor Limit)
as revised above

326 IAC 2-6 (Emission Reporting)
as revised above

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 Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

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

State Rule Applicability - Individual Facilities

326 IAC 2-4.1 (New Source Toxics Control)
Pursuant to 326 IAC 2-4.1-1, this modification is not subject to any New Source Toxics Control requirements because the potential to emit (PTE) of the spray coating booth is less than 10 tons per year of any HAP and less than 25 tons per year of any combination of HAPs.

326 IAC 6-3-2(d) (Particulate Matter (PM))
Pursuant to 326 IAC 6-3-2(d), overspray from the surface coating process shall be controlled by a dry particulate filter, waterwash, or an equivalent control device. The source shall operate the control device in accordance with manufacturer's specifications.

326 IAC 8-1-6 (New Facilities: General Reduction Requirements)
The new spray booth SB9 is not subject to 326 IAC 8-1-6 (General Provisions Relating to VOC Rules) because the potential VOC emissions are less than twenty-five (25) tons per year.

326 IAC 8-2-1 (Surface Coating Emission Limitations: Applicability)
Pursuant to 326 IAC 8-2-1(a)(4) (Surface Coating Emission Limitations: Applicability), and based on the PTE calculations for the surface coating booth SB9, the new booth could have actual VOC emissions greater than fifteen (15) pounds per day. However, surface coating of fiberglass boats is not described in sections 2 through 13 of this rule; therefore, the new spray booth SB9 is not subject to 326 IAC 8-2.

Compliance Monitoring Requirements

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

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

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

The IMRON spray paint booth SB9 has 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 paint spray booth SB9 while the booth is 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 Response Plan - Preparation, Implementation, Records, and Reports, 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 rooftop and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. 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 Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

This monitoring condition is necessary because the particulate control is required for compliance with 326 IAC 6-3-2.

Conclusion

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Minor Permit Modification No. 001-21331-00031.

**Appendix A: Emission Calculations
IMRON Paint Spray Booth SB9**

Company Name: Thunderbird Products, Inc.
Address: 2200 West Monroe Street, Decatur, IN 46733
Permit Modification Number: 001-21331-00031
Plt ID: 001-00031
Reviewer: Vickie Cordell
Application Date: April 26, 2005

Emission Unit ID: SB9

<u>Material</u>	<u>Density (Lb/Gal)</u>	<u>Weight % Volatile (Water & Organics)</u>	<u>Weight % Water</u>	<u>Weight % Organics</u>	<u>Volume % Water</u>	<u>Volume % Non-Volatile (Solids)</u>	<u>Gal of Coating (Gal/Unit)</u>	<u>Maximum (Unit/Hr)</u>	<u>Lbs VOC per Gal of Coating Less Water</u>	<u>Lbs VOC per Gal of Coating</u>	<u>Potential VOC (Lb/Hr)</u>	<u>Potential VOC (Lb/Day)</u>	<u>Potential VOC (Ton/Yr)</u>
As Supplied													
IMRON Tint 531U	8.36	64.67	0.00	64.67	0.00	30.50	1.00	0.078	5.41	5.41	0.42	10.12	1.85
IMRON Additive 192S	7.90	84.48	0.00	84.48	0.00	20.52	1.00	0.078	6.67	6.67	0.52	12.49	2.28
IMRON Reducer 8485S													
IMRON Accelerator 8989S													
As Applied													
IMRON Tint 531U	8.20	70.10	0.00	70.10	0.00	22.53	1.00	0.078	5.75	5.75	0.45	10.76	1.96
Cleaning Solvent													
Lacquer Thinner 3608S	6.60	100.00	0.00	100.00	0.00	0.00	0.50	0.078	6.60	6.60	0.26	6.18	1.13

Maximum Potential VOC Emissions: **3.09**

Methodology:

Coating "As Applied" calculations determined in Significant Source Modification # 001-11987-00031 (refer to Attachment 5 for verification)

Lbs VOC per Gallon Coating less Water = [Density (lb/gal) x Weight % Organics] / [1 - Volume % Water]

Lbs VOC per Gallon Coating = [Density (lb/gal) x Weight % Organics]

Potential VOC (Lb/Hr) = [Lbs of VOC per Gallon Coating (lb/gal) x Gallon of Coating (gal/unit) x Maximum (units/hr)]

Potential VOC (Lb/Day) = [Lbs of VOC per Gallon Coating (lb/gal) x Gallon of Coating (gal/unit) x Maximum (units/hr) x (24 hr/day)]

Potential VOC (Ton/Yr) = [Lbs of VOC per Gallon Coating (lb/gal) x Gallon of Coating (gal/unit) x Maximum (units/hr) x (8760 hr/yr) x (1 ton/2000 lb)]

Maximum Potential VOC Emissions = Sum of "As Applied" Tint and Lacquer Thinner emissions

**Appendix A: Emission Calculations
IMRON Paint Spray Booth SB9**

Company Name: Thunderbird Products, Inc.
Address: 2200 West Monroe Street, Decatur, IN 46733
Permit Modification Number: 001-21331-00031
Pt ID: 001-00031
Reviewer: Vickie Cordell
Application Date: April 26, 2005

Emission Unit ID: SB9

Material As Supplied	Density (Lb/Gal)	Weight % Volatile (Water & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatile (Solids)	Gal of Coating (Gal/Unit)	Maximum (Unit/Hr)	Spray Gun Transfer Efficiency (%)	Potential PM (Lb/Hr)	Potential PM (Lb/Day)	Potential PM (Ton/Yr)
IMRON Tint 531U	8.36	64.67	0.00	64.67	0.00	30.50	1.00	0.078				
IMRON Additive 192S	7.90	84.48	0.00	84.48	0.00	20.52	1.00	0.078				
IMRON Reducer 8485S												
IMRON Accelerator 8989S												
As Applied												
IMRON Tint 531U	8.20	70.10	0.00	70.10	0.00	22.53	1.00	0.078	50.0	0.10	2.29	0.42
Cleaning Solvent												
Lacquer Thinner 3608S	6.60	100.00	0.00	100.00	0.00	0.00	0.50	0.078	---	0.00	0.00	0.00
Maximum Potential PM Emissions:												0.42

Methodology:

Coating "As Applied" calculations determined in Significant Source Modification # 001-11987-00031 (refer to Attachment 5 for verification)

Potential PM (Lb/Hr) = [Gallon Material (gal/unit) x Maximum (units/hr) x Density (lb/gal) x (1 - Weight % Volatiles) x (1 - Transfer Efficiency %)]

Potential PM (Lb/Day) = Potential PM (lb/hr) x (24 hr/day)

Potential PM (Ton/Yr) = Potential PM (lb/hr) x (8760 hr/yr) x (1 ton/2000 lb)

Assume a conservative 50% transfer efficiency for spray atomization guns.

Maximum Potential PM Emissions = "As Applied" Tint emissions (i.e., overspray from air atomization spray guns)

There are no PM emissions from cleaning solvent application because it is 100% organic.

**Appendix A: Emission Calculations
IMRON Paint Spray Booth SB9**

Company Name: Thunderbird Products, Inc.
Address: 2200 West Monroe Street, Decatur, IN 46733
Permit Modification Number: 001-21331-00031
Plt ID: 001-00031
Reviewer: Vickie Cordell
Application Date: April 26, 2005

Emission Unit ID: SB9

<u>Material</u>	<u>Density (Lb/Gal)</u>	<u>Gal of Coating (Gal/Unit)</u>	<u>Maximum (Unit/Hr)</u>	<u>Weight % Glycol Ethers</u>	<u>Weight % Ethyl Benzene</u>	<u>Weight % Methyl Alcohol</u>	<u>Weight % Toluene</u>	<u>Weight % Xylene</u>	<u>Glycol Ethers (Ton/Yr)</u>	<u>Ethyl Benzene (Ton/Yr)</u>	<u>Methyl Alcohol (Ton/Yr)</u>	<u>Toluene (Ton/Yr)</u>	<u>Xylene (Ton/Yr)</u>
IMRON Tint 531U	8.36	1.00	0.078	0.0	0.3	0.0	3.0	1.0	0.00	0.01	0.00	0.09	0.03
IMRON Additive 192S	7.90	1.00	0.078	0.0	0.0	0.0	0.0	0.0	0.00	0.00	0.00	0.00	0.00
IMRON Reducer 8485S	7.50	1.00	0.078	10.0	0.0	0.0	0.0	0.0	0.26	0.00	0.00	0.00	0.00
IMRON Accelerator 8989S	8.15	1.00	0.078	0.0	0.0	0.0	0.0	0.0	0.00	0.00	0.00	0.00	0.00
Lacquer Thinner 3608S	6.60	0.50	0.078	3.0	0.0	4.0	13.0	0.0	0.03	0.00	0.05	0.15	0.00
Maximum Potential Single HAP Emissions:									0.29	0.01	0.05	0.23	0.03

Methodology:

Potential HAP (Ton/Yr) = [Density (lb/gal) x Gal of Coating (gal/unit) x Maximum (unit/hr) x Weight % HAP x (8760 hr/yr) x (1 ton/2000 lb)]

Maximum Potential HAP Emissions = "As Supplied" paint (e.g., tint, additive, reducer, and accelerator) and lacquer thinner organic HAP emissions

**Appendix A: Emission Calculations
Natural Gas-Fired Spray Booth Heater**

Company Name: Thunderbird Products, Inc.
Address: 2200 West Monroe Street, Decatur, IN 46733
Permit Modification Number: 001-21331-00031
Pit ID: 001-00031
Reviewer: Vickie Cordell
Application Date: April 26, 2005

<u>Pollutant</u>	<u>Emission Factor (Lb/MMCF)</u>
PM	7.6
SO ₂	0.6
NOx	100.0
VOC	5.5
CO	84.0

Emission factors are based upon USEPA AP-42 (7/98), Chapter 1.4, Tables 1.4-1 and 1.4-2
 Emission factors are valid for all sizes of natural gas combustion sources.

<u>Emission Source</u>	<u>Emission Source Heat Input Capacity (MMBTU/Hr)</u>	<u>Potential Throughput (MMCF/Yr)</u>	<u>Potential Emissions</u>				
			<u>PM (Ton/Yr)</u>	<u>SO₂ (Ton/Yr)</u>	<u>NOx (Ton/Yr)</u>	<u>VOC (Ton/Yr)</u>	<u>CO (Ton/Yr)</u>
Paint Spray Booth Heater (SBH3)	3.00	26.280	0.100	0.008	1.314	0.072	1.104

Potential Throughput (MMCF) = Heat Input Capacity (MMBTU/Hr) x 8760 Hrs/Yr x (1 MMCF/1000 MMBTU)

Potential Emissions (Tons/Yr) = Potential Throughput (MMCF/Yr) x EF (Lb/MMCF) x (1 Ton/2000 Lb)