



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: Ajjjpril 13, 2006  
RE: Thunderbird Products, Inc. / 001-22370-00031  
FROM: Nisha Sizemore  
Chief, Permits Branch  
Office of Air Quality

### Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures  
FNPER.dot 03/23/06



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We make Indiana a cleaner, healthier place to live.*

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*Mitchell E. Daniels, Jr.*  
Governor

*Thomas W. Easterly*  
Commissioner

100 North Senate Avenue  
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**April 13, 2006**

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

Re: 001-22370-00031  
Second Significant Source Modification to:  
Part 70 permit No.: T001-5903-00031

Dear Mr. Laux:

Thunderbird Products, Inc. was issued Part 70 operating permit T001-5903-00031 on October 14, 1999, for a stationary source manufacturing fiberglass pleasure boats. An application to modify the source was received on December 28, 2005. Pursuant to 326 IAC 2-7-10.5 the following emission units are approved for construction at the source:

- (a) Eight (8) gel coating/resin booths, identified as STB13, STB14, STB15, STB16, STB17, STB18, STB20, and STB21, constructed in 2006, with a maximum capacity of 0.0057 boat per hour per booth, using dry filters as PM control, exhausting to vents 043 through 054.
- (b) Two (2) gel coating/resin booths, identified as STB19 and STB24, constructed in 2006, with a maximum capacity of 0.02 boat per hour per booth, using dry filters as PM control, exhausting to vents 043 through 054.
- (c) One (1) gel coating/resin booth, identified as STB22, constructed in 2006, with a maximum capacity of 0.0125 boat per hour, using dry filters as PM control, exhausting to vents 043 through 054.
- (d) One (1) gel coating/resin booth, identified as STB23, constructed in 2006, with a maximum capacity of 0.0167 boat per hour, using dry filters as PM control, exhausting to vents 043 through 054.
- (e) One (1) gel coating booth, identified as GSB3, constructed in 2006, with a maximum capacity of ten (10) boat molds per year, using dry filters as PM control, exhausting to vent 042.
- (f) Five (5) natural gas-fired air make-up units, with a total rated capacity of 13.20 mmBTU/hr.

The following construction conditions are applicable to the proposed project:

General Construction Conditions

1. The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may

- affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).
2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.
  3. Effective Date of the Permit  
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.
  4. Pursuant to 326 IAC 2-1.1-9 and 326 IAC 2-7-10.5(i), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.
  5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.
  6. Pursuant to 326 IAC 2-7-10.5(l) the emission units constructed under this approval shall not be placed into operation prior to revision of the source's Part 70 Operating Permit to incorporate the required operation conditions.

This significant source modification authorizes construction of the new emission units. Operating conditions shall be incorporated into the Part 70 operating permit as a significant permit modification in accordance with 326 IAC 2-7-10.5(l)(2) and 326 IAC 2-7-12. Operation is not approved until the significant permit modification has been issued.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter call (800) 451-6027, press 0 and ask for Madhurima Moulik or extension 3-0868 or dial (317) 233-0868.

Sincerely,

Original signed by

Nisha Sizemore, Chief  
Permits Branch  
Office of Air Quality

Attachments

MDM

cc: File – Adams County  
Adams County Health Department  
Air Compliance Section Inspector – Ryan Hillman  
Compliance Data Section  
Administrative and Development



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**PART 70 OPERATING PERMIT  
SIGNIFICANT SOURCE 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: Paul Dubenetzky, Assistant Commissioner Office of Air Quality	Issuance Date: October 14, 1999  Expiration Date: October 14, 2004

2 <sup>nd</sup> Significant Source Modification No.: 001-22370-00031	
Issued by: Origin signed by Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: April 13, 2006

## SECTION A SOURCE SUMMARY

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

### A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

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The Permittee owns and operates a stationary fiberglass boat manufacturing and repair facility.

Responsible Official:	Plant Manager
Source Address:	2200 West Monroe Street, Decatur, Indiana 46733
Mailing Address:	2200 West Monroe Street, Decatur, Indiana 46733
General Source Phone Number:	(260) 724-9111
SIC Code:	3732
County Location:	Adams
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD; 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)]

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

- (a) Eight (8) gel coating/resin booths, identified as STB13 (exhausting to vent 043), STB14 (exhausting to vent 044), STB15 (exhausting to vent 045), STB16 (exhausting to vent 046), STB17 (exhausting to vent 047), STB18 (exhausting to vent 048), STB20 (exhausting to vent 050), and STB21 (exhausting to vent 051), constructed in 2006, with a maximum capacity of 0.0057 boat per hour per booth, using dry filters as PM control.
- (b) Two (2) gel coating/resin booths, identified as STB19 (exhausting to vent 049) and STB24 (exhausting to vent 054), constructed in 2006, with a maximum capacity of 0.02 boat per hour per booth, using dry filters as PM control.
- (c) One (1) gel coating/resin booth, identified as STB22, constructed in 2006, with a maximum capacity of 0.0125 boat per hour, using dry filters as PM control, exhausting to vent 052.
- (d) One (1) gel coating/resin booth, identified as STB23, constructed in 2006, with a maximum capacity of 0.0167 boat per hour, using dry filters as PM control, exhausting to vent 053.
- (e) One (1) gel coating booth, identified as GSB3, constructed in 2006, with a maximum capacity of ten (10) boat molds per year, using dry filters as PM control, exhausting to vent 042.

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

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

- (a) Five (5) natural gas-fired air make-up units, with a total rated capacity of 13.20 mmBTU/hr.

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

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

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

## SECTION D.2

## FACILITY OPERATION CONDITIONS

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

- (1) Eight (8) gel coating/resin booths, identified as STB13 (exhausting to vent 043), STB14 (exhausting to vent 044), STB15 (exhausting to vent 045), STB16 (exhausting to vent 046), STB17 (exhausting to vent 047), STB18 (exhausting to vent 048), STB20 (exhausting to vent 050), and STB21 (exhausting to vent 051), constructed in 2006, with a maximum capacity of 0.0057 boat per hour per booth, using dry filters as PM control.
- (2) Two (2) gel coating/resin booths, identified as STB19 (exhausting to vent 049) and STB24 (exhausting to vent 054), constructed in 2006, with a maximum capacity of 0.02 boat per hour per booth, using dry filters as PM control.
- (3) One (1) gel coating/resin booth, identified as STB22, constructed in 2006, with a maximum capacity of 0.0125 boat per hour, using dry filters as PM control, exhausting to vent 052.
- (4) One (1) gel coating/resin booth, identified as STB23, constructed in 2006, with a maximum capacity of 0.0167 boat per hour, using dry filters as PM control, exhausting to vent 053.
- (5) One (1) gel coating booth, identified as GSB3, constructed in 2006, with a maximum capacity of ten (10) boat molds per year, using dry filters as PM control, exhausting to vent 042.

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

### General Construction Conditions

#### D.2.1 Permit No Defense

This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

#### D.2.2 Modification to Construction Conditions [326 IAC 2]

All requirements of these construction conditions shall remain in effect unless modified in a manner consistent with procedures established for modifications pursuant to 326 IAC 2.

### Operation Conditions

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

#### D.2.3 PSD Minor Limit [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable, for emissions units included in Sections D.1 and D.2, the use of resins and gel coats at all gel coating and resin application booths, and the VOC input for the paint application booths, lamination and foam filling areas, and assembly, subassembly, and upholstery areas, combined, shall be limited such that the potential to emit (PTE) volatile organic compounds (VOC) shall be less than 244 tons per twelve (12) consecutive months with compliance determined at the end of each month. Compliance with this limit shall be determined based on 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" 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.

**D.2.4 Particulate Matter (PM) [326 IAC 6-3-2(d)]**

Pursuant to 326 IAC 6-3-2(d), overspray from gel coating/resin booths STB13 through STB24, and gel coating booth GSB3 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.2.5 Emissions from Fiberglass Boat Manufacturing [326 IAC 20-48-2]**

Pursuant to 326 IAC 20-48-2, the Permittee shall comply with the alternative HAP content requirements for gel coat operations:

Operation	Gel Coat Application	
	Application Method	Weighted-Average Percent Organic HAP Content (weight percent) Monthly Limit
Pigmented gel coat operations	Atomized (spray)	33 percent
Clear gel coat operations	Atomized (spray)	48 percent
Tooling gel coat operations	Atomized (spray)	40 percent
Pigmented gel coat operations	Nonatomized (nonspray)	40 percent
Clear gel coat operations	Nonatomized (nonspray)	55 percent
Tooling gel coat operations	Nonatomized (nonspray)	54 percent

Compliance with these HAP monomer content limits shall be demonstrated on a monthly weighted average basis. If all of the gel coats used during a month meet the specified HAP monomer content limits, then maintaining records of content and usage as specified under Condition D.2.12 is sufficient for demonstrating compliance with the HAP monomer content limits.

**D.2.6 Work Practices for Fiberglass Boat Manufacturing [326 IAC 20-48-3]**

Pursuant to 326 IAC 20-48-3, the Permittee shall meet the following work practices:

- (a) Nonatomizing spray equipment shall not be operated at pressures that atomize the material during the application process.
- (b) Solvents sprayed during cleanup and resin changes shall be directed into solvent collection containers.
- (c) For routine flushing of resin and gel coat application equipment, such as spray guns, flowcoaters, brushes, rollers, and squeegees, owners or operators must use a cleaning solvent that contains no hazardous air pollutants (HAPs). However, recycled cleaning solvents that contain less than or equal to five percent (5%) HAP by weight are considered to contain no HAP for the purposes of this subdivision. For removing cured resin or gel coat from application equipment, no organic HAP limit applies.
- (d) Clean-up rags with solvent shall be stored in closed containers.
- (e) Closed containers shall be used for the storage of the following:
  - (1) All production and tooling resins that contain HAPs.
  - (2) All production and tooling gel coats that contain HAPs.
  - (3) Waste resins and gel coats that contain HAPs.
  - (4) Cleaning materials, including waste cleaning materials.
  - (5) Other materials that contain HAPs.

The covers of the closed containers must have no visible gaps and must be in place at all times, except when equipment is placed in or removed from the container.

#### D.2.7 Operator Training for Fiberglass Boat Manufacturing [326 IAC 20-48-4]

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Pursuant to 326 IAC 20-48-4, the Permittee shall:

- (a) Train all new and existing personnel, including contract personnel, who are involved in resin and gel coat spraying and applications that could result in excess emissions if performed improperly according to the following schedule:
  - (i) All personnel hired shall be trained within fifteen (15) days of hiring.
  - (ii) To ensure training goals listed in subsection (b) are maintained, all personnel shall be given refresher training annually.
  - (iii) Personnel who have been trained by another owner or operator subject to this rule are exempt from subdivision (1) if written documentation that the employee's training is current is provided to the new employer.
- (b) The lesson plans shall cover, for the initial and refresher training, at a minimum, all of the following topics:
  - (i) Appropriate application techniques.
  - (ii) Appropriate equipment cleaning procedures.
  - (iii) Appropriate equipment setup and adjustment to minimize material usage and overspray.

#### D.2.8 Preventive Maintenance Plan [326 IAC 2-7-4(c)(9)]

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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.2.9 Testing Requirements [326 IAC 20-48]

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Compliance with the HAP monomer content limitation in Condition D.2.5 shall be determined using one (1) of the following:

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

#### D.2.10 VOC Emissions [326 IAC 8-1-4][326 IAC 8-2-1(a)]

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Compliance with the VOC content and usage limitations contained in Conditions D.2.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA-approved form, emission factors shall be taken from the following reference approved by IDEM, OAQ: "Unified Emission Factors for Open Molding of Composites" July 23, 2001, or its updates. The VOC emissions from the paint spray booths, lamination and foam filling areas, and assembly, subassembly and upholstery areas shall be calculated by multiplying the usage of each material by the VOC content as shown on the MSDS. The VOC emissions for dilution solvents and cleanup solvents shall be calculated by multiplying the usage of each solvent by the VOC content as shown on the MSDS. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

### **D.2.11 Monitoring**

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- (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 vents 43 through 54 while one or more of the booths STB13 through STB24 that exhaust to these vents are in operation, and vent 42 while GSB3 is in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C – Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C – Response to Excursions or Exceedances, shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or evidence of overspray emissions is observed, the Permittee shall take reasonable response steps in accordance with Section C – Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C – Response to excursions or Exceedances, shall be considered a deviation from this permit.

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

### **D.2.12 Record Keeping Requirements**

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- (a) To document compliance with Condition D.2.3, 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.2.3.
  - (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.2.11, the Permittee shall maintain a log of daily overspray observations, and daily and weekly inspections.
- (c) To document compliance with Condition D.2.7, the Permittee shall maintain the following training records on site and available for inspection and review:
  - (1) A copy of the current training program.
  - (2) A list of all current personnel, by name, that are required to be trained and the dates they were trained and the date of the most recent refresher training.
  - (3) Records of prior training programs and former personnel are not required to be maintained.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

### **D.2.13 Reporting Requirements**

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A quarterly summary of the information to document compliance with Conditions D.2.3 and D.2.12 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 E FACILITY OPERATION CONDITIONS

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

- (1) Three (3) gel coating booths, identified as GSB4, GSB5, and GSB6, constructed in 1988, with a maximum capacity of 0.13 boats per hour per booth, using dry filters as PM 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, constructed in 1988, with a maximum capacity of 0.005 boats per hour per booth, using dry filters as PM 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, constructed in 1988, and SB9, constructed in 2005, with a maximum capacity of 0.078 boats per hour per booth, using dry filters as PM 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 AV2 through AV7 constructed in 1988, with AV8 constructed in 2000, and AV9 constructed in 2002, with a maximum capacity of 0.13 boats per hour per area, using dry filters as PM control, and exhausting to stacks/vents, #3, #4, #5, #6, #7, #8, #9 and #38.
- (5) Eight (8) stationary booths for gel coating/resin applications, identified as STB5 through STB12, with STB7 through STB11 constructed in 2000, with STB5, STB6 and STB12 constructed in 2002, with a maximum capacity of 0.025 boat units per hour per booth, each using dry filters as PM control, exhausting to stacks/vents #27, #28, #29, #30, #31, #32, #36, and #37, respectively.
- (6) Three (3) paint spray booths, identified as SB6, SB7, and SB8, constructed in 2000, with a maximum capacity of 0.025 boat units per hour per booth, each using dry filters as PM control, and each exhausting to stacks/vents #33, #34, and #35, respectively.
- (7) One (1) assembly, subassembly, upholstery area, constructed in 2000, with a maximum capacity of processing 0.25 boat units per hour, and exhausting to the atmosphere.
- (8) Eight (8) gel coating/resin booths, identified as STB13 (exhausting to vent 043), STB14 (exhausting to vent 044), STB15 (exhausting to vent 045), STB16 (exhausting to vent 046), STB17 (exhausting to vent 047), STB18 (exhausting to vent 048), STB20 (exhausting to vent 050), and STB21 (exhausting to vent 051), constructed in 2006, with a maximum capacity of 0.0057 boat per hour per booth, using dry filters as PM control.
- (9) Two (2) gel coating/resin booths, identified as STB19 (exhausting to vent 049) and STB24 (exhausting to vent 054), constructed in 2006, with a maximum capacity of 0.02 boat per hour per booth, using dry filters as PM control.
- (10) One (1) gel coating/resin booth, identified as STB22, constructed in 2006, with a maximum capacity of 0.0125 boat per hour, using dry filters as PM control, exhausting to vent 052.
- (11) One (1) gel coating/resin booth, identified as STB23, constructed in 2006, with a maximum capacity of 0.0167 boat per hour, using dry filters as PM control, exhausting to vent 053.
- (12) One (1) gel coating booth, identified as GSB3, constructed in 2006, with a maximum capacity of ten (10) boat molds per year, using dry filters as PM control, exhausting to vent 042.

### Insignificant Activities

Other activities or categories not previously identified with emissions below insignificant thresholds:

- (1) Mold making and repair activities using tooling resins and gelcoats.
- (2) Use of organic peroxide catalysts in resin and gelcoat application areas.

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

## National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements [326 IAC 2-7-5(1)]

### E.1 General Provisions Relating to HAPs [326 IAC 20-1-1][40 CFR 63, Subpart A]

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

### E.2 Boat Manufacturing Operations NESHAP [326 IAC 20-48] [40 CFR Part 63, Subpart VVVV]

The Permittee that engages in boat manufacturing operations shall comply with the provisions of 40 CFR Part 63, Subpart VVVV, which are incorporated by reference as 326 IAC 20-48, as follows:

#### Sec. 63.5689 What parts of my facility are covered by this subpart?

The affected source (the portion of your boat manufacturing facility covered by this subpart) is the combination of all of the boat manufacturing operations listed in paragraphs (a) through (f) of this section.

- (a) Open molding resin and gel coat operations (including pigmented gel coat, clear gel coat, production resin, tooling gel coat, and tooling resin).
- (b) Closed molding resin operations.
- (c) Resin and gel coat mixing operations.
- (d) Resin and gel coat application equipment cleaning operations.
- (e) Carpet and fabric adhesive operations.
- (f) \*\*\*

#### § 63.5695 When must I comply with this subpart?

You must comply with the standards in this subpart by the compliance dates specified in Table 1 to this subpart.

#### Standards for Open Molding Resin and Gel Coat Operations

#### § 63.5698 Emission limit for open molding resin and gel coat operations

- (a) You must limit organic HAP emissions from the five open molding operations listed in paragraphs (a)(1) through (5) of this section to the emission limit specified in paragraph (b) of this section. Operations listed in paragraph (d) are exempt from this limit.
  - (1) Production resin.
  - (2) Pigmented gel coat.
  - (3) Clear gel coat.
  - (4) Tooling resin.
  - (5) Tooling gel coat.
- (b) You must limit organic HAP emissions from open molding operations to the limit specified by equation 1 of this section, based on a 12-month rolling average.

$$\text{HAP Limit} = [46(M_R) + 159(M_{PG}) + 291(M_{CG}) + 54(M_{TR}) + 214(M_{TG})] \quad \text{.(Eq. 1)}$$

Where:

HAP Limit = total allowable organic HAP that can be emitted from the open molding operations, kilograms.

MR = mass of production resin used in the past 12 months, excluding any materials exempt under paragraph (d) of this section, megagrams.

MPG = mass of pigmented gel coat used in the past 12 months, excluding any materials exempt

- under paragraph (d) of this section, megagrams.  
MCG = mass of clear gel coat used in the past 12 months, excluding any materials exempt under paragraph (d) of this section, megagrams.  
MTR = mass of tooling resin used in the past 12 months, excluding any materials exempt under paragraph (d) of this section, megagrams.  
MTG = mass of tooling gel coat used in the past 12 months, excluding any materials exempt under paragraph (d) of this section, megagrams.
- (c) The open molding emission limit is the same for both new and existing sources.
- (d) The materials specified in paragraphs (d)(1) through (3) of this section are exempt from the open molding emission limit specified in paragraph (b) of this section.
- (1) Production resins (including skin coat resins) that must meet specifications for use in military vessels or must be approved by the U.S. Coast Guard for use in the construction of lifeboats, rescue boats, and other lifesaving appliances approved under 46 CFR subchapter Q or the construction of small passenger vessels regulated by 46 CFR subchapter T. Production resins for which this exemption is used must be applied with nonatomizing (non-spray) resin application equipment. You must keep a record of the resins for which you are using this exemption.
- (2) Pigmented, clear, and tooling gel coat used for part or mold repair and touch up. The total gel coat materials included in this exemption must not exceed 1 percent by weight of all gel coat used at the facility on a 12-month rolling-average basis. You must keep a record of the amount of gel coats used per month for which you are using this exemption and copies of calculations showing that the exempt amount does not exceed 1 percent of all gel coat used.
- (3) Pure, 100 percent vinylester resin used for skin coats. This exemption does not apply to blends of vinylester and polyester resins used for skin coats. The total resin materials included in the exemption cannot exceed 5 percent by weight of all resin used at the facility on a 12-month rolling-average basis. You must keep a record of the amount of 100 percent vinylester skin coat resin used per month that is eligible for this exemption and copies of calculations showing that the exempt amount does not exceed 5 percent of all resin used.

#### § 63.5701 Options for complying with the open molding emission limit

You must meet the emission limit in § 63.5698 for the resins and gel coats used in open molding operations at the facility.

- (a) *Maximum achievable control technology (MACT) model point value averaging (emissions averaging) option.*
- (1) Demonstrate that emissions from the open molding resin and gel coat operations that you average meet the emission limit in § 63.5698 using the procedures described in § 63.5710. Compliance with this option is based on a 12-month rolling average.
- (2) \*\*\*\*\*
- (b) – (c) \*\*\*\*\*

#### § 63.5704 General requirements for complying with the open molding emission limit

- (a) *Emissions averaging option.* For those open molding operations and materials complying using the emissions averaging option, you must demonstrate compliance by performing the steps in paragraphs (a)(1) through (5) of this section.
- (1) Use the methods specified in § 63.5758 to determine the organic HAP content of resins and gel coats.
- (2) Complete the calculations described in § 63.5710 to show that the organic HAP emissions do not exceed the limit specified in § 63.5698.
- (3) Keep records as specified in paragraphs (a)(3)(i) through (iv) of this section for each resin and gel coat.

- (i) Hazardous air pollutant content.
  - (ii) Amount of material used per month.
  - (iii) Application method used for production resin and tooling resin. This record is not required if all production resins and tooling resins are applied with nonatomized technology.
  - (iv) Calculations performed to demonstrate compliance based on MACT model point values, as described in § 63.5710.
- (4) Prepare and submit the implementation plan described in § 63.5707 to the Administrator and keep it up to date.
  - (5) Submit semiannual compliance reports to the Administrator as specified in § 63.5764.

**§ 63.5707 Implementation plan for open molding operations and when to prepare one**

- (a) You must prepare an implementation plan for all open molding operations for which to comply by using the emissions averaging option described in § 63.5704(a).
- (b) The implementation plan must describe the steps you will take to bring the open molding operations covered by this subpart into compliance. For each operation included in the emissions average, the implementation plan must include the elements listed in paragraphs (b)(1) through (3) of this section.
  - (1) A description of each operation included in the average.
  - (2) The maximum organic HAP content of the materials used, the application method used (if any atomized resin application methods are used in the average), and any other methods used to control emissions.
  - (3) Calculations showing that the operations covered by the plan will comply with the open molding emission limit specified in § 63.5698.
- (c) You must submit the implementation plan to the Administrator with the notification of compliance status specified in § 63.5761.
- (d) You must keep the implementation plan on site and provide it to the Administrator when asked.
- (e) If you revise the implementation plan, you must submit the revised plan with the next semiannual compliance report specified in § 63.5764.

**§ 63.5710 Demonstration of compliance using emissions averaging**

- (a) Compliance using the emissions averaging option is demonstrated on a 12-month rolling-average basis and is determined at the end of every month (12 times per year). The first 12-month rolling-average period begins on the compliance date specified in § 63.5695.
- (b) At the end of the twelfth month after the compliance date and at the end of every subsequent month, use equation 1 of this section to demonstrate that the organic HAP emissions from those operations included in the average do not exceed the emission limit in § 63.5698 calculated for the same 12-month period. (Include terms in equation 1 of § 63.5698 and equation 1 of this section for only those operations and materials included in the average.)

$$\text{HAP emissions} = [(PV_R)(M_R) + (PV_{PG})(M_{PG}) + (PV_{CG})(M_{CG}) + (PV_{TR})(M_{TR}) + (PV_{TG})(M_{TG})]$$

(Eq 1)

Where:

HAP emissions = Organic HAP emissions calculated using MACT model point values for each operation included in the average, kilograms.

PV<sub>R</sub> = Weighted-average MACT model point value for production resin used in the past 12 months,

kilograms per megagram.

$M_R$  = Mass of production resin used in the past 12 months, megagrams.

$PV_{PG}$  = Weighted-average MACT model point value for pigmented gel coat used in the past 12 months, kilograms per megagram.

$M_{PG}$  = Mass of pigmented gel coat used in the past 12 months, megagrams.

$PV_{CG}$  = Weighted-average MACT model point value for clear gel coat used in the past 12 months, kilograms per megagram.

$M_{CG}$  = Mass of clear gel coat used in the past 12 months, megagrams.

$PV_{TR}$  = Weighted-average MACT model point value for tooling resin used in the past 12 months, kilograms per megagram.

$M_{TR}$  = Mass of tooling resin used in the past 12 months, megagrams.

$PV_{TG}$  = Weighted-average MACT model point value for tooling gel coat used in the past 12 months, kilograms per megagram.

$M_{TG}$  = Mass of tooling gel coat used in the past 12 months, megagrams.

- (c) At the end of every month, use equation 2 of this section to compute the weighted-average MACT model point value for each open molding resin and gel coat operation included in the average.

$$PV_{OP} = \frac{\sum_{i=1}^n (M_i PV_i)}{\sum_{i=1}^n (M_i)} \quad (\text{Eq.2})$$

Where:

$PV_{OP}$  = weighted-average MACT model point value for each open molding operation ( $PV_R$ ,  $PV_{PG}$ ,  $PV_{CG}$ ,  $PV_{TR}$ , and  $PV_{TG}$ ) included in the average, kilograms of HAP per megagram of material applied.

$M_i$  = mass of resin or gel coat  $i$  used within an operation in the past 12 months, megagrams.

$N$  = number of different open molding resins and gel coats used within an operation in the past 12 months.

$PV_i$  = the MACT model point value for resin or gel coat  $i$  used within an operation in the past 12 months, kilograms of HAP per megagram of material applied.

- (d) You must use the equations in Table 3 to this subpart to calculate the MACT model point value ( $PV_i$ ) for each resin and gel coat used in each operation in the past 12 months.
- (e) If the organic HAP emissions, as calculated in paragraph (b) of this section, are less than the organic HAP limit calculated in § 63.5698(b) for the same 12-month period, then you are in compliance with the emission limit in § 63.5698 for those operations and materials included in the average.

### § 63.5731 Standards for resin and gel coat mixing operations

- (a) All resin and gel coat mixing containers with a capacity equal to or greater than 208 liters, including those used for on-site mixing of putties and polyputties, must have a cover with no visible gaps in place at all times.
- (b) The work practice standard in paragraph (a) of this section does not apply when material is being manually added to or removed from a container, or when mixing or pumping equipment is being placed in or removed from a container.
- (c) To demonstrate compliance with the work practice standard in paragraph (a) of this section, you must visually inspect all mixing containers subject to this standard at least once per month. The inspection should ensure that all containers have covers with no visible gaps between the cover and the container, or between the cover and equipment passing through the cover.

- (d) You must keep records of which mixing containers are subject to this standard and the results of the inspections, including a description of any repairs or corrective actions taken.

**§ 63.5734 Standards for resin and gel coat application equipment cleaning operations**

- (a) For routine flushing of resin and gel coat application equipment (e.g., spray guns, flowcoaters, brushes, rollers, and squeegees), you must use a cleaning solvent that contains no more than 5 percent organic HAP by weight. For removing cured resin or gel coat from application equipment, no organic HAP content limit applies.
- (b) You must store organic HAP-containing solvents used for removing cured resin or gel coat in containers with covers. The covers must have no visible gaps and must be in place at all times, except when equipment to be cleaned is placed in or removed from the container. On containers with a capacity greater than 7.6 liters, the distance from the top of the container to the solvent surface must be no less than 0.75 times the diameter of the container. Containers that store organic HAP-containing solvents used for removing cured resin or gel coat are exempt from the requirements of 40 CFR part 63, subpart T. Cured resin or gel coat means resin or gel coat that has changed from a liquid to a solid.

**§ 63.5737 Demonstration of compliance with the resin and gel coat application equipment cleaning standards**

- (a) Determine and record the organic HAP content of the cleaning solvents subject to the standards specified in § 63.5734 using the methods specified in § 63.5758.
- (b) If you recycle cleaning solvents on site, you may use documentation from the solvent manufacturer or supplier or a measurement of the organic HAP content of the cleaning solvent as originally obtained from the solvent supplier for demonstrating compliance, subject to the conditions in § 63.5758 for demonstrating compliance with organic HAP content limits.
- (c) At least once per month, you must visually inspect any containers holding organic HAP-containing solvents used for removing cured resin and gel coat to ensure that the containers have covers with no visible gaps. Keep records of the monthly inspections and any repairs made to the covers.

**§ 63.5758 Determination of the organic HAP content of materials**

- (a) *Determine the organic HAP content for each material used.* To determine the organic HAP content for each material used in the open molding resin and gel coat operations, carpet and fabric adhesive operations, or aluminum recreational boat surface coating operations, you must use one of the options in paragraphs (a)(1) through (6) of this section.
  - (1) *Method 311 (appendix A to 40 CFR part 63).* You may use Method 311 for determining the mass fraction of organic HAP. Use the procedures specified in paragraphs (a)(1)(i) and (ii) of this section when determining organic HAP content by Method 311.
    - (i) Include in the organic HAP total each organic HAP that is measured to be present at 0.1 percent by mass or more for Occupational Safety and Health Administration (OSHA)-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and at 1.0 percent by mass or more for other compounds. For example, if toluene (not an OSHA carcinogen) is measured to be 0.5 percent of the material by mass, you do not need to include it in the organic HAP total. Express the mass fraction of each organic HAP you measure as a value truncated to four places after the decimal point (for example, 0.1234).
    - (ii) Calculate the total organic HAP content in the test material by adding up the

individual organic HAP contents and truncating the result to three places after the decimal point (for example, 0.123).

- (2) *Method 24 (appendix A to 40 CFR part 60)*. You may use Method 24 to determine the mass fraction of nonaqueous volatile matter of aluminum coatings and use that value as a substitute for mass fraction of organic HAP.
- (3) *ASTM D1259–85 (Standard Test Method for Nonvolatile Content of Resins)*. You may use ASTM D1259–85 (available for purchase from ASTM) to measure the mass fraction of volatile matter of resins and gel coats for open molding operations and use that value as a substitute for mass fraction of organic HAP.
- (4) *Alternative method*. You may use an alternative test method for determining mass fraction of organic HAP if you obtain prior approval by the Administrator. You must follow the procedure in § 63.7(f) to submit an alternative test method for approval.
- (5) *Information from the supplier or manufacturer of the material*. You may rely on information other than that generated by the test methods specified in paragraphs (a)(1) through (4) of this section, such as manufacturer's formulation data, according to paragraphs (a)(5)(i) through (iii) of this section.
  - (i) Include in the organic HAP total each organic HAP that is present at 0.1 percent by mass or more for OSHA defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and at 1.0 percent by mass or more for other compounds. For example, if toluene (not an OSHA carcinogen) is 0.5 percent of the material by mass, you do not have to include it in the organic HAP total.
  - (ii) If the organic HAP content is provided by the material supplier or manufacturer as a range, then you must use the upper limit of the range for determining compliance. If a separate measurement of the total organic HAP content using the methods specified in paragraphs (a)(1) through (4) of this section exceeds the upper limit of the range of the total organic HAP content provided by the material supplier or manufacturer, then you must use the measured organic HAP content to determine compliance.
  - (iii) If the organic HAP content is provided as a single value, you may assume the value is a manufacturing target value and actual organic HAP content may vary from the target value. If a separate measurement of the total organic HAP content using the methods specified in paragraphs (a)(1) through (4) of this section is less than 2 percentage points higher than the value for total organic HAP content provided by the material supplier or manufacturer, then you may use the provided value to demonstrate compliance. If the measured total organic HAP content exceeds the provided value by 2 percentage points or more, then you must use the measured organic HAP content to determine compliance.
- (6) *Solvent blends*. Solvent blends may be listed as single components for some regulated materials in certifications provided by manufacturers or suppliers. Solvent blends may contain organic HAP which must be counted toward the total organic HAP content of the materials. When detailed organic HAP content data for solvent blends are not available, you may use the values for organic HAP content that are listed in Table 5 or 6 to this subpart. You may use Table 6 to this subpart only if the solvent blends in the materials you use do not match any of the solvent blends in Table 5 to this subpart and you know only whether the blend is either aliphatic or aromatic. However, if test results indicate higher values than those listed in Table 5 or 6 to this subpart, then the test results must be used for determining compliance.

#### **§ 63.5761 Notifications to submit**

- (a) You must submit all of the notifications in Table 7 to this subpart that apply to you by the dates in the table. The notifications are described more fully in 40 CFR part 63, subpart A, General Provisions, referenced in Table 8 to this subpart.
- (b) If you change any information submitted in any notification, you must submit the changes in writing to the Administrator within 15 calendar days after the change.

### § 63.5764 Reports to submit

- (a) You must submit the applicable reports specified in paragraphs (b) through (e) of this section. To the extent possible, you must organize each report according to the operations covered by this subpart and the compliance procedure followed for that operation.
- (b) Unless the Administrator has approved a different schedule for submission of reports under § 63.10(a), you must submit each report by the dates in paragraphs (b)(1) through (5) of this section.
  - (1) If your source is not controlled by an add-on control device (i.e., you are complying with organic HAP content limits, application equipment requirements, or MACT model point value averaging provisions), the first compliance report must cover the period beginning 12 months after the compliance date specified for the source in § 63.5695 and ending on June 30 or December 31, whichever date is the first date following the end of the first 12-month period after the compliance date that is specified for the source in § 63.5695.
  - (2) The first compliance report must be postmarked or delivered no later than 60 calendar days after the end of the compliance reporting period specified in paragraph (b)(1) of this section.
  - (3) Each subsequent compliance report must cover the applicable semiannual reporting period from January 1 through June 30 or from July 1 through December 31.
  - (4) Each subsequent compliance report must be postmarked or delivered no later than 60 calendar days after the end of the semiannual reporting period.
  - (5) For each affected source that is subject to permitting regulations pursuant to 40 CFR part 70 or 71, and if the permitting authority has established dates for submitting semiannual reports pursuant to 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), you may submit the first and subsequent compliance reports according to the dates the permitting authority has established instead of according to the dates in paragraphs (b)(1) through (4) of this section.
- (c) The compliance report must include the information specified in paragraphs (c)(1) through (7) of this section.
  - (1) Company name and address.
  - (2) A statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the report.
  - (3) The date of the report and the beginning and ending dates of the reporting period.
  - (4) A description of any changes in the manufacturing process since the last compliance report.
  - (5) A statement or table showing, for each regulated operation, the applicable organic HAP content limit, application equipment requirement, or MACT model point value averaging provision with which you are complying. The statement or table must also show the actual weighted-average organic HAP content or weighted-average MACT model point value (if applicable) for each operation during each of the rolling 12-month averaging periods that end during the reporting period.
  - (6) If you were in compliance with the emission limits and work practice standards during the reporting period, you must include a statement to that effect.
  - (7) If you deviated from an emission limit or work practice standard during the reporting period, you must also include the information listed in paragraphs (c)(7)(i) through (iv) of this section in the semiannual compliance report.
    - (i) A description of the operation involved in the deviation.
    - (ii) The quantity, organic HAP content, and application method (if relevant) of the materials involved in the deviation.
    - (iii) A description of any corrective action you took to minimize the deviation and actions you have taken to prevent it from happening again.
    - (iv) A statement of whether or not the facility was in compliance for the 12-month averaging period that ended at the end of the reporting period.

### **§ 63.5767 Record keeping**

The Permittee must keep the records specified in paragraphs (a) through (d) of this section in addition to records specified in individual sections of this subpart.

- (a) The Permittee must keep a copy of each notification and report that you submitted to comply with this subpart.
- (b) The Permittee must keep all documentation supporting any notification or report that are submitted.
- (c) If your facility is not controlled by an add-on control device (i.e., you are complying with organic HAP content limits, application equipment requirements, or MACT model point value averaging provisions), the Permittee must keep the records specified in paragraphs (c)(1) through (3) of this section.
  - (1) The total amounts of open molding production resin, pigmented gel coat, clear gel coat, tooling resin, and tooling gel coat used per month and the weighted-average organic HAP contents for each operation, expressed as weightpercent. For open molding production resin and tooling resin, you must also record the amounts of each applied by atomized and nonatomized methods.
  - (2) \*\*\*\*
  - (3) \*\*\*\*

### **§ 63.5770 The form and length of time records must be kept**

- (a) Records must be readily available and in a form so they can be easily inspected and reviewed.
- (b) Each record must be kept for 5 years following the date that it is generated.
- (c) Each record must be kept on site for at least 2 years after the date that it is generated. Records can be kept offsite for the remaining 3 years.
- (d) Records can be kept on paper or an alternative media, such as microfilm, computer, computer disks, magnetic tapes, or on microfiche.

### **§ 63.5773 What parts of the General Provisions apply to me?**

You must comply with the requirements of the General Provisions in 40 CFR part 63, subpart A, as specified in Table 8 to this subpart.

### **§ 63.5776 Who implements and enforces this subpart?**

- (a) If the Administrator has delegated authority to your State or local agency, the State or local agency has the authority to implement and enforce this subpart.
- (b) In delegating implementation and enforcement authority of this subpart to a State or local agency under 40 CFR part 63, subpart E, the authorities that are retained by the Administrator of the U.S. EPA and are not transferred to the State or local agency are listed in paragraphs (b)(1) through (4) of this section.
  - (1) Under Sec. 63.6(g), the authority to approve alternatives to the standards listed in paragraphs (b)(1)(i) through (vii) of this section is not delegated.
    - (i) Sec. 63.5698--Emission limit for open molding resin and gel coat operations.
    - (ii) Sec. 63.5728--Standards for closed molding resin operations.

- (iii) Sec. 63.5731(a)--Standards for resin and gel coat mixing operations.
  - (iv) Sec. 63.5734--Standards for resin and gel coat application equipment cleaning operations.
  - (v) Sec. 63.5740(a)--Emission limit for carpet and fabric adhesive operations.
  - (vi) Sec. 63.5743--Standards for aluminum recreational boat surface coating operations.
  - (vii) Sec. 63.5746(g)--Approval of alternative means of demonstrating compliance with the emission limits for aluminum recreational boat surface coating operations.
- (2) Under Sec. 63.7(e)(2)(ii) and (f), the authority to approve alternatives to the test methods listed in paragraphs (b)(2)(i) through (iv) of this section is not delegated.
- (i) Sec. 63.5719(b)--Method for determining whether an enclosure is a total enclosure.
  - (ii) Sec. 63.5719(c)--Methods for measuring emissions from a control device.
  - (iii) Sec. 63.5725(d)(1)--Performance specifications for thermal oxidizer combustion temperature monitors.
  - (iv) Sec. 63.5758--Method for determining hazardous air pollutant content of regulated materials.
- (3) Under Sec. 63.8(f), the authority to approve major alternatives to the monitoring requirements listed in Sec. 63.5725 is not delegated. A "major alternative" is defined in Sec. 63.90.
- (4) Under Sec. 63.10(f), the authority to approve major alternatives to the reporting and recordkeeping requirements listed in Secs. 63.5764, 63.5767, and 63.5770 is not delegated. A "major alternative" is defined in Sec. 63.90.

#### **§ 63.5779 What definitions apply to this subpart?**

Terms used in this subpart are defined in the Clean Air Act, in Sec. 63.2, and in this section as follows:

Add-on control means an air pollution control device, such as a thermal oxidizer, that reduces pollution in an air stream by destruction or removal before discharge to the atmosphere.

Administrator means the Administrator of the United States Environmental Protection Agency (U.S. EPA) or an authorized representative (for example, a State delegated the authority to carry out the provisions of this subpart).

Aluminum recreational boat means any marine or freshwater recreational boat that has a hull or deck constructed primarily of aluminum. A recreational boat is a vessel which by design and construction is intended by the manufacturer to be operated primarily for pleasure, or to be leased, rented or chartered to another for the latter's pleasure (rather than for commercial or military purposes); and whose major structural components are fabricated and assembled in an indoor, production-line manufacturing plant or similar land-side operation and not in a dry dock, graving dock, or marine railway on the navigable waters of the United States.

Aluminum recreational boat surface coating operation means the application of primers or top coats to aluminum recreational boats. It also includes the application of clear coats over top coats. Aluminum recreational boat surface coating operations do not include the application of wood coatings or antifoulant coatings to aluminum recreational boats.

Aluminum coating spray gun cleaning means the process of flushing or removing paints or coatings from the interior or exterior of a spray gun used to apply aluminum primers, clear coats, or top coats to aluminum recreational boats.

Aluminum wipedown solvents means solvents used to remove oil, grease, welding smoke, or other contaminants from the aluminum surfaces of a boat before priming or painting. Aluminum wipedown solvents contain no coating solids; aluminum surface preparation materials that contain coating solids are considered coatings for the purpose of this subpart and are not wipedown solvents.

Antifoulant coating means any coating that is applied to the underwater portion of a boat specifically to

prevent or reduce the attachment of biological organisms and that is registered with EPA as a pesticide under the Federal Insecticide, Fungicide, and Rodenticide Act (7 U.S.C. section 136, et seq.). For the purpose of this subpart, primers used with antifoulant coatings to prepare the surface to accept the antifoulant coating are considered antifoulant coatings.

Assembly adhesive means any chemical material used in the joining of one fiberglass, metal, foam, or wood parts to another to form a temporary or permanently bonded assembly. Assembly adhesives include, but are not limited to, methacrylate adhesives and putties made from polyester or vinylester resin mixed with inert fillers or fibers.

Atomized resin application means a resin application technology in which the resin leaves the application equipment and breaks into droplets or an aerosol as it travels from the application equipment to the surface of the part. Atomized resin application includes, but is not limited to, resin spray guns and resin chopper spray guns.

Boat means any type of vessel, other than a seaplane, that can be used for transportation on the water.

Boat manufacturing facility means a facility that manufactures the hulls or decks of boats from fiberglass or aluminum or assembles boats from premanufactured hulls and decks, or builds molds to make fiberglass hulls or decks. A facility that manufactures only parts of boats (such as hatches, seats, or lockers) or boat trailers, but no boat hulls or decks or molds for fiberglass boat hulls or decks, is not considered a boat manufacturing facility for the purpose of this subpart.

Carpet and fabric adhesive means any chemical material that permanently attaches carpet, fabric, or upholstery to any surface of a boat.

Clear gel coat means gel coats that are clear or translucent so that underlying colors are visible. Clear gel coats are used to manufacture parts for sale. Clear gel coats do not include tooling gel coats used to build or repair molds.

Closed molding means any molding process in which pressure is used to distribute the resin through the reinforcing fabric placed between two mold surfaces to either saturate the fabric or fill the mold cavity. The pressure may be clamping pressure, fluid pressure, atmospheric pressure, or vacuum pressure used either alone or in combination. The mold surfaces may be rigid or flexible. Closed molding includes, but is not limited to, compression molding with sheet molding compound, infusion molding, resin injection molding (RIM), vacuum-assisted resin transfer molding (VARTM), resin transfer molding (RTM), and vacuum-assisted compression molding. Processes in which a closed mold is used only to compact saturated fabric or remove air or excess resin from the fabric (such as in vacuum bagging), are not considered closed molding. Open molding steps, such as application of a gel coat or skin coat layer by conventional open molding prior to a closed molding process, are not closed molding.

Cured resin and gel coat means resin or gel coat that has been polymerized and changed from a liquid to a solid.

Deviation means any instance in which an affected source subject to this subpart or an owner or operator of such a source:

- (1) Fails to meet any requirement or obligation established by this subpart, including, but not limited to, any emission limit, operating limit, or work practice requirement;
- (2) Fails to meet any term or condition which is adopted to implement an applicable requirement in this subpart and which is included in the operating permit for any affected source required to obtain such permit; or
- (3) Fails to meet any emission limit, operating limit, or work practice requirement in this subpart during any startup, shutdown, or malfunction, regardless of whether or not such failure is permitted by this subpart.

Enclosure means a structure, such as a spray booth, that surrounds a source of emissions and captures and directs the emissions to an add-on control device.

Fiberglass boat means a vessel in which either the hull or deck is built from a composite material consisting of a thermosetting resin matrix reinforced with fibers of glass, carbon, aramid, or other material. Fiberglass hull and deck coatings means coatings applied to the exterior or interior surface of fiberglass boat hulls and decks on the completed boat. Polyester and vinylester resins and gel coats used in building fiberglass parts are not fiberglass hull and deck coatings for the purpose of this subpart.

Filled resin means a resin to which an inert material has been added to change viscosity, density, shrinkage, or other physical properties.

Gel coat means a thermosetting resin surface coating containing styrene (Chemical Abstract Service or CAS No. 100-42-5) or methyl methacrylate (CAS No. 80-62-6), either pigmented or clear, that provides a cosmetic enhancement or improves resistance to degradation from exposure to the elements. Gel coat layers do not contain any reinforcing fibers and gel coats are applied directly to mold surfaces or to a finished laminate.

Hazardous air pollutant or HAP means any air pollutant listed in, or pursuant to section 112(b) of the Clean Air Act.

Hazardous air pollutant content or HAP content means the amount of HAP contained in a regulated material at the time it is applied to the part being manufactured. If no HAP is added to a material as a thinner or diluent, then the HAP content is the same as the HAP content of the material as purchased from the supplier. For resin and gel coat, HAP content does not include any HAP contained in the catalyst added to the resin or gel coat during application to initiate curing.

Hazardous air pollutant data sheet (HDS) means documentation furnished by a material supplier or an outside laboratory to provide the organic HAP content of the material by weight, measured using an EPA Method, manufacturer's formulation data, or an equivalent method. For aluminum coatings, the HDS also documents the solids content by volume, determined from the manufacturer's formulation data. The purpose of the HDS is to help the affected source in showing compliance with the organic HAP content limits contained in this subpart. The HDS must state the maximum total organic HAP concentration, by weight, of the material. It must include any organic HAP concentrations equal to or greater than 0.1 percent by weight for individual organic HAP that are carcinogens, as defined by the Occupational Safety and Health Administration Hazard Communication Standard (29 CFR part 1910), and 1.0 percent by weight for all other individual organic HAP, as formulated. The HDS must also include test conditions if EPA Method 311 is used for determining organic HAP content. Maximum achievable control technology (MACT) model point value means a number calculated for open molding operations that is a surrogate for emissions and is used to determine if your open molding operations are in compliance with the provisions of this subpart. The units for MACT model point values are kilograms of organic HAP per megagram of resin or gel coat applied.

Manufacturer's certification means documentation furnished by a material supplier that shows the organic HAP content of a material and includes a HDS.

Mold means the cavity or surface into or on which gel coat, resin, and fibers are placed and from which finished fiberglass parts take their form.

Mold sealing and release agents means materials applied to a mold to seal, polish, and lubricate the mold to prevent parts from sticking to the mold. Mold sealers, waxes, and glazing and buffing compounds are considered mold sealing and release agents for the purposes of this subpart.

Mold stripping and cleaning solvents means materials used to remove mold sealing and release agents from a mold before the mold surface is repaired, polished, or lubricated during normal mold maintenance.

Month means a calendar month.

Neat resin means a resin to which no filler has been added.

Nonatomized resin application means any application technology in which the resin is not broken into droplets or an aerosol as it travels from the application equipment to the surface of the part. Nonatomized resin application technology includes, but is not limited to, flowcoaters, chopper flowcoaters, pressure fed resin rollers, resin impregnators, and hand application (for example, paint brush or paint roller).

Open molding resin and gel coat operation means any process in which the reinforcing fibers and resin are placed in the mold and are open to the surrounding air while the reinforcing fibers are saturated with resin. For the purposes of this subpart, open molding includes operations in which a vacuum bag or similar cover is used to compress an uncured laminate to remove air bubbles or excess resin, or to achieve a bond between a core material and a laminate.

Pigmented gel coat means opaque gel coats used to manufacture parts for sale. Pigmented gel coats do not include tooling gel coats used to build or repair molds.

Production resin means any resin used to manufacture parts for sale. Production resins do not include tooling resins used to build or repair molds, or assembly adhesives as defined in this section.

Recycled resin and gel coat application equipment cleaning solvent means cleaning solvents recycled on-site or returned to the supplier or another party to remove resin or gel coat residues so that the solvent can be reused.

Research and development activities means:

- (1) Activities conducted at a laboratory to analyze air, soil, water, waste, or product samples for contaminants, environmental impact, or quality control;
- (2) Activities conducted to test more efficient production processes or methods for preventing or reducing adverse environmental impacts, provided that the activities do not include the production of an intermediate or final product for sale or exchange for commercial profit, except in a de minimis manner; and
- (3) Activities conducted at a research or laboratory facility that is operated under the close supervision of technically trained personnel, the primary purpose of which is to conduct research and development into new processes and products and that is not engaged in the manufacture of products for sale or exchange for commercial profit, except in a de minimis manner.

Resin means any thermosetting resin with or without pigment containing styrene (CAS No. 100-42-5) or methyl methacrylate (CAS No. 80-62-6) and used to encapsulate and bind together reinforcement fibers in the construction of fiberglass parts.

Resin and gel coat application equipment cleaning means the process of flushing or removing resins and gel coats from the interior or exterior of equipment that is used to apply resin or gel coat in the manufacture of fiberglass parts.

Resin and gel coat mixing operation means any operation in which resin or gel coat, including the mixing of putties or polyputties, is combined with additives that include, but are not limited to, fillers, promoters, or catalysts.

Roll-out means the process of using rollers, squeegees, or similar tools to compact reinforcing materials saturated with resin to remove trapped air or excess resin.

Skin coat is a layer of resin and fibers applied over the gel coat to protect the gel coat from being deformed by the next laminate layers.

Tooling resin means the resin used to build or repair molds (also known as tools) or prototypes (also known as plugs) from which molds will be made.

Tooling gel coat means the gel coat used to build or repair molds (also known as tools) or prototypes (also known as plugs) from which molds will be made.

Vacuum bagging means any molding technique in which the reinforcing fabric is saturated with resin and then covered with a flexible sheet that is sealed to the edge of the mold and where a vacuum is applied under the sheet to compress the laminate, remove excess resin, or remove trapped air from the laminate during curing. Vacuum bagging does not include processes that meet the definition of closed molding.

Vinylester resin means a thermosetting resin containing esters of acrylic or methacrylic acids and having

double-bond and ester linkage sites only at the ends of the resin molecules.

Volume fraction of coating solids means the ratio of the volume of coating solids (also known as volume of nonvolatiles) to the volume of coating; liters of coating solids per liter of coating.

Wood coatings means coatings applied to wooden parts and surfaces of boats, such as paneling, cabinets, railings, and trim. Wood coatings include, but are not limited to, primers, stains, sealers, varnishes, and enamels. Polyester and vinylester resins or gel coats applied to wooden parts to encapsulate them or bond them to other parts are not wood coatings.

*Table 1 to Subpart VVVV—Compliance Dates for New and Existing Boat Manufacturing Facilities*  
 As specified in § 63.5695, you must comply by the dates in the following table:

If your facility is -	And	Then you must comply by this date -
2. An existing or new area source	Becomes a major source after August 22, 2001	<sup>1</sup> year after becoming a major source or August 22, 2002, whichever is later

<sup>1</sup>Your facility is a major source if it is a stationary source or group of stationary sources located within a contiguous area and under common control that emits or can potentially emit, considering controls, in the aggregate, 9.1 megagrams or more per year of a single hazardous air pollutant or 22.7 megagrams or more per year of a combination of hazardous air pollutants.

*Table 2 to Subpart VVVV--Alternative Organic HAP Content Requirements for Open Molding Resin and Gel Coat Operations*

As specified in Secs. 63.5701(b), 63.5704(b)(2), and 63.5713(a), (b), and (d), you must comply with the requirements in the following table:

For this operation--	And this applicaton method--	You must not exceed this weighted-average organic HAP content (weight percent) requirement--
1. Production resin operations	Atomized (spray)	28 percent
2. Production resin operations	Nonatomized (nonspray)	35 percent
3. Pigmented gel coat operations	Any method	33 percent
4. Clear gel coat operations	Any method	48 percent
5. Tooling resin operations	Atomized (spray)	30 percent
6. Tooling resin operations	Nonatomized (nonspray)	30 percent
7. Tooling gel coat operations	Any method	40 percent

*Table 3 to Subpart VVVV—MACT Model Point Value Formulas for Open Molding Operations*

As specified in §§ 63.5710(d) and 63.5714(a), you must calculate point values using the formulas in the following table:

For this operation—	And this application method—	Use this formula to calculate the MACT model plant value for each resin and gel coat—
1. Production resin, tooling resin.....	a. Atomized .....	$0.014 \cdot (\text{Resin HAP}\%)^{2.425}$
	b. Atomized, plus vacumm bagging with roll-out .....	$0.01185 \cdot (\text{Resin HAP}\%)^{2.425}$
	c. Atomized, plus vacuum bagging without roll-out	$0.00945 \cdot (\text{Resin HAP}\%)^{2.425}$
	d. Nonatomized .....	$0.014 \cdot (\text{Resin HAP}\%)^{2.275}$
	e. Nonatomized, plus vaccum bagging with roll-out	$0.0110 \cdot (\text{Resin HAP}\%)^{2.275}$
	f. Nonatomized, plus vacuum bagging without rollout.	$0.0076 \cdot (\text{Resin HAP}\%)^{2.275}$
2. Pigmented gel coat, clear gel coat, tooling gel coat	All methods.....	$0.445 \cdot (\text{Gel coat HAP}\%)^{1.675}$

*Table 5 to Subpart VVVV—Default Organic HAP Contents of Solvents and Solvent Blends*  
 As specified in § 63.5758(a)(6), when detailed organic HAP content data for solvent blends are not available, you may use the values in the following table:

Solvent/solvent blend	CAS No.	Average organic HAP content, percent by mass	Typical organic HAP, percent by mass
1. Toluene .....	108–88–3	100	Toluene.
2. Xylene (s).....	1330–20–7	100	Xylenes, ethylbenzene
3. Hexane .....	110–54–3	50	n-hexane.
4. n-hexane.....	110–54–3	100	n-hexane.
5. Ethylbenzene .....	100–41–4	100	Ethylbenzene.
6. Aliphatic 140 .....	.....	0	None.
7. Aromatic 100 .....	.....	2	1% xylene, 1% cumene.
8. Aromatic 150 .....	.....	9	Naphthalene.
9. Aromatic naptha .....	64742–95–6	2	1% xylene, 1% cumene.
10. Aromatic solvent .....	64742–94–5	10	Naphthalene.
11. Exempt mineral spirits.....	8032–32–4	0	None
12. Ligroines (VM & P) .	8032–32–4	0	None.
13. Lactol spirits .....	64742–89–6	15	Toluene.
14. Low aromatic white spirit .....	64742–82–1	0	None.
15. Mineral spirits .....	64742–88–7	1	Xylenes.
16. Hydrotreated naphtha .....	64742–48–9	0	None
17. Hydrotreated light distillate ....	64742–47–8	0.1	Toluene
18. Stoddard solvent .....	8052–41–3	1	Xylenes.
19. Super high-flash naphtha .....	64742–95–6	5	Xylenes.
20. Varol® solvent .....	8052–49–3	1	0.5% xylenes, 0.5% ethyl benzene.
21. VM & P naphtha .....	64742–89–8	6	3% toluene, 3% xylene.
22. Petroleum distillate mixture ...	68477–31–6	8	4% naphthalene, 4% biphenyl.

*Table 6 to Subpart VVVV--Default Organic HAP Contents of Petroleum Solvent Groups*  
 As specified in Sec. 63.5758(a)(6), when detailed organic HAP content data for solvent blends are not available, you may use the values in the following table:

Solvent type	Average organic HAP content, percent by mass	Typical organic HAP, percent by mass
Aliphatic (Mineral Spirits 135, Mineral Spirits 150 EC, Naphtha, Mixed Hydrocarbon, Aliphatic Hydrocarbon, Aliphatic Naptha, Naphthol Spirits, Petroleum Spirits, Petroleum Oil, Petroleum Naphtha, Solvent Naphtha, Solvent Blend.)	3	1% Xylene, 1% Toluene, and 1% Ethylbenzene.
Aromatic (Medium-flash Naphtha, High-flash Naphtha, Aromatic Naphtha, Light Aromatic Naphtha, Light Aromatic Hydrocarbons, Aromatic Hydrocarbons, Light Aromatic Solvent.)	6	4% Xylene, 1% Toluene, and 1% Ethylbenzene

Table 7 to Subpart VVVV--Applicability and Timing of Notifications  
 As specified in Sec. 63.5761(a), you must submit notifications according to the following table:

If your facility	You must submit	By this date
1. Is an existing source subject to this subpart	An initial notification containing the information specified in Sec. 63.9(b)(2).	No later than the dates specified in Sec. 63.9(b)(2).
2. Is a new source subject to this subpart	The notification specified in 63.9(b) (3) to (5).	No later than the dates specified in Sec. 63.9(b)(4) and (5).
3. Qualifies for a compliance extension specified in Sec. 63.9(c).	A request for a compliance extension as specified in Sec. 63.9(c)	No later than the dates specified in Sec. 63.6(i).
4. Is complying with organic HAP content limits, application equipment requirements; or MACT model point value averaging provisions.	A notification of compliance status as specified in Sec. 63.9(h).	No later than 30 calendar days after the end of the first 12-month averaging period after your facility's compliance date.
5. Is complying by using an add-on control device	a. notification of intent to conduct a date specified in performance test as specified in Sec. 63.9(e). b. A notification of the date for the continuous monitoring system performance evaluation as specified in Sec. 63.9(g). c. A notification of compliance status as specified in Sec. 63.9(h).	No later than the date specified in Sec. 63.9(e).  With the notification of intent to conduct a performance test.  No later than 60 calendar days after the completion of the add-on control device performance test and continuous monitoring system performance evaluation.

Table 8 to Subpart VVVV--Applicability of General Provisions (40 CFR Part 63, Subpart A) to Subpart VVVV

As specified in Sec. 63.5773, you must comply with the applicable requirements of the General Provisions according to the following table:

Citation	Requirement	Applies to Subpart VVVV	Explanation
Sec. 63.1(a)	General Applicability	Yes	
Sec. 63.1(b)	Initial Applicability Determination	Yes	
Sec. 63.1(c)(1)	Applicability After Standard Established	Yes	Area sources are not regulated by subpart VVVV.
Sec. 63.1(c)(2)		Yes	
Sec. 63.1(c)(3)		No	[Reserved]
Sec. 63.1(c)(4)-(5)		Yes	
Sec. 63.1(d)		No	[Reserved]
Sec 63.1(e)	Applicability of Permit Program.	Yes	
Sec. 63.2	Definitions	Yes	Additional definitions are found in Sec. 63.5779.
Sec. 63.3	Units and Abbreviations	Yes	
Sec. 63.4(a)	Prohibited Activities	Yes	
Sec. 63.4(b)-(c)	Circumvention/ Severability	Yes	
Sec. 63.5(a)	Construction/ Reconstruction	Yes	
Sec. 63.5(b)	Requirements for Existing, Newly Constructed, and Reconstructed Sources	Yes	
Sec. 63.5(c)		No	[Reserved]
Sec. 63.5(d)	Application for Approval of Construction/ Reconstruction	Yes	
Sec. 63.5(e)	Approval of Construction/ Reconstruction	Yes	
Sec. 63.5(f)	Approval of Construction/ Reconstruction Based on prior State Review.	Yes	
Sec. 63.6(a)	Compliance with Standards and	Yes	

Citation	Requirement	Applies to Subpart VVVV	Explanation
Sec. 63.6(b)	Maintenance Requirements-- Applicability Compliance Dates for New and Reconstructed Sources	Yes	Sec. 63.695 specifies compliance dates, including the compliance date for new area sources that become major sources after the effective date of the rule
Sec. 63.6(c)	Compliance Dates for Existing Sources	Yes	Sec. 63.5695 specifies compliance dates, including the compliance date for existing area that become major sources after the effective date of the rule
Sec. 63.6(d)		No	[Reserved]
Sec. 63.6(e)(1)-(2)	Operation and Maintenance Requirements	No	Operating requirements for open molding operations with add-on controls are specified in Sec. 63.5725.
Sec. 63.6(e)(3)	Startup, Shut Down, and Malfunction Plans	Yes	Only sources with add- on controls must complete startup, shutdown, and malfunction plans.
Sec. 63.6(f)	Compliance with Nonopacity Emission Standards	Yes	
Sec. 63.6(g)	Use of an Alternative Nonopacity Emission Standard	Yes	
Sec. 63.6(h)	Compliance with Opacity/ Visible Emissions Standards	No	Subpart VVVV does not specify opacity or visible emission standards
Sec. 63.6(i)	Extension of Compliance with Emission Standards.	Yes	
Sec. 63.6(j)	Exemption from Compliance with Emission Standards.	Yes	
Sec. 63.7(a)(1)	Performance Test Requirements	Yes	
Sec. 63.7(a)(2)	Dates for performance tests	No	Sec. 63.5716 specifies performance test dates
Sec. 63.7(a)(3)	Performance testing at other times	Yes	
Sec. 63.7(b)-(h)	Other performance testing requirements	Yes	
Sec. 63.8(a)(1)-(2)	Monitoring Requirements - Applicability	Yes	All of Sec. 63.8 applies only to sources with add-on controls. Additional monitoring requirements for sources with add-on controls are found in Sec. 63.5725.
Sec. 63.8(a)(3)		No	Reserved
Sec. 63.8(a)(4)		No	Subpart VVVV does not refer directly or indirectly to Sec. 63.11
Sec. 63.8(b)(1)	Conduct of Monitoring	Yes	
Sec. 63.8(b)(2)-(3)	Multiple Effluents and Multiple Continuous Monitoring Systems (CMS)	Yes	Applies to sources that use a CMS on the control device stack.
Sec. 63.8(c)(1)-(4)		Yes	Continuous Monitoring System Operation and Maintenance
Sec. 63.8(c)(5)	Continuous Opacity Monitoring Systems (COMS)	No	Subpart VVVV does not have opacity or visible emission standards
Sec. 63.8(c)(6)-(8)	Continuous Monitoring System Calibration Checks and Out-of Control Periods	Yes	
Sec. 63.8(d)	Quality Control Program	Yes	
Sec. 63.8(e)	CMS Performance Evaluation	Yes	
Sec. 63.8(f)(1)-(5)	Use of an Alternative Monitoring Method	Yes	
Sec. 63.8(f)(6)	Alternative to Relative Accuracy Test	Yes	Applies only to sources that use continuous emission monitoring systems (CEMS).
Sec. 63.8(g)	Data Reduction	Yes	
Sec. 63.9(a)	Notification Requirements - Applicability	Yes	
Sec. 63.9(b)	Initial Notifications	Yes	
Sec. 63.9(c)	Request for Compliance Extension	Yes	
Sec. 63.9(d)	Notification that a New Source is Subject to Special Compliance Requirements	Yes	

Sec. 63.9(e)	Notification of Performance Test	Yes	Applies only to sources with add-on controls
Sec. 63.9(f)	Notification of Visible Emissions/Opacity Test	No	Subpart VVVV does not specify opacity or visible emission standards
Sec. 63.9(g)(1)	Additional CMS Notifications--Date of CMS Performance Evaluation	Yes	Applies only to sources with add-on controls
Sec. 63.9(g)(2)	Use of COMS Data	No	Subpart VVVV does not require the use of COMS
Citation	Requirement	Applies to Subpart VVVV	Explanation
Sec. 63.9(g)(3)	Alternative to Relative Accuracy Testing	Yes	Applies only to sources with CEMS
Sec. 63.9(h)	Notification of Compliance Status	Yes	
Sec. 63.9(i)	Adjustment of Deadlines	Yes	
Sec. 63.9(j)	Change in Previous Information	Yes	
Sec. 63.10(a)	Recordkeeping/Reporting Applicability	Yes	
Sec. 63.10(b)(1)	General Recordkeeping Requirements	Yes	Secs. 63.567 and 63.5770 specify additional recordkeeping requirements.
Sec. 63.10(b)(2)(i)-(xi)	Recordkeeping Relevant to Startup, Shutdown, and Malfunction Periods and CMS.	Yes	Applies only to sources with add-on controls
Sec. 63.10(b)(2)(xii)-(xiv)	General Recordkeeping Requirements	Yes	
Sec. 63.10(b)(3)	Recordkeeping Requirements for Applicability Determinations	Yes	Sec. 63.5686 specifies applicability determinations for non-major sources.
Sec. 63.10(c)	Additional Recordkeeping for Sources with CMS	Yes	Applies only to sources with add-on controls
Sec. 63.10(d)(1)	General Reporting Requirements	Yes	Sec. 63.5764 specifies additional reporting requirements
Sec. 63.10(d)(2)	Performance Test Results	Yes	Sec. 63.5764 specifies additional requirements for reporting performance test results
Sec. 63.10(d)(3)	Opacity or Visible Emissions Observations	No	Subpart VVVV does not specify opacity or visible emission standards
Sec. 63.10(d)(4)	Progress Reports for Sources with Compliance Extensions	Yes	
Sec. 63.10(d)(5)	Startup, Shutdown, and Malfunction Reports	Yes	Applies only to sources with add-on controls
Sec. 63.10(e)(1)	Additional CMS Reports- General	Yes	Applies only to sources with add-on controls
Sec. 63.10(e)(2)	Reporting Results of CMS Performance Evaluations	Yes	Applies only to sources with add-on controls
Sec. 63.10(e)(3)	Excess Emissions/CMS Performance Reports	Yes	Applies only to sources with add-on controls
Sec. 63.10(e)(4)	COMS Data Reports	No	Subpart VVVV does not specify opacity or visible emission standards
Sec. 63.10(f)	Recordkeeping/Reporting Waiver	Yes	
Sec. 63.11	Control Device Requirements- Applicability	No	Facilities subject to subpart VVVV do not use flares as control devices
Sec. 63.12	State Authority and Delegations	Yes	
Sec. 63.13	Addresses	Yes	
Sec. 63.14	Incorporation by Reference	Yes	
Sec. 63.15	Availability of Information/ Confidentiality	Yes	Sec. 63.5776 lists hose sections of subpart A that are not delegated.

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

**Part 70 Quarterly Report  
VOC Emissions Limit**

Source Name: Thunderbird Products, Inc.  
Source Address: 2200 West Monroe Street, Decatur, Indiana 46733  
Mailing Address: 2200 West Monroe Street, Decatur, Indiana 46733  
Part 70 Permit No.: T001-5903-00031  
Facility: Emission Units Listed in D.1 and D.2  
Parameter: Volatile Organic Compounds (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) VOC emissions from the paint booths, lamination and foam filling areas, and the assembly, subassembly, and upholstery areas shall be based on the VOC input.

YEAR:

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

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.  
Deviation has been reported on:

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

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

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

**Source Description and Location**

<b>Source Name:</b>	<b>Thunderbird Products, Inc.</b>
<b>Source Location:</b>	<b>2200 West Monroe Street, Decatur, IN 46733</b>
<b>County:</b>	<b>Adams</b>
<b>SIC Code:</b>	<b>3732</b>
<b>Operation Permit No.:</b>	<b>T 001-5903-00031</b>
<b>Operation Permit Issuance Date:</b>	<b>October 14, 1999</b>
<b>Significant Source Modification No.:</b>	<b>001-22370-00031</b>
<b>Significant Permit Modification No.:</b>	<b>001-22659-00031</b>
<b>Permit Reviewer:</b>	<b>Madhurima D. Moulik</b>

**Existing Approvals**

The source was issued Part 70 Operating Permit No. T001-5903-00031 on October 14, 1999. The source has since received the following approvals:

- (a) First Significant Permit Modification No. 001-11543-00031 issued on September 18, 2000;
- (b) First Administrative Amendment No. 001-11985-00031 issued on October 11, 2000;
- (c) First Reopening No. 001-13125-00031 issued on November 29, 2001;
- (d) Second Significant Permit Modification No. 001-16599-00031 issued on January 10, 2003;
- (e) Third Significant Permit Modification No.: 001-17374-00031 issued on August 15, 2003;  
and
- (f) First Minor Permit Modification No.: 001-21331-00031 issued on August 17, 2005.

**County Attainment Status**

The source is located in Adams County.

<b>Pollutant</b>	<b>Status</b>
PM10	Attainment
PM2.5	Attainment
SO <sub>2</sub>	Attainment
NO <sub>2</sub>	Attainment
1-hour Ozone	Attainment
8-hour Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) and nitrogen oxides (NO<sub>x</sub>) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to ozone. Adams County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO<sub>x</sub> emissions

were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

- (b) Adams County has been classified as attainment for PM2.5. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM2.5 emissions. Therefore, until the U.S.EPA adopts specific provisions for PSD review for PM2.5 emissions, it has directed states to regulate PM10 emissions as a surrogate for PM2.5 emissions.
- (c) Adams County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (d) Fugitive Emissions  
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3, fugitive emissions are not counted toward the determination of PSD and Emission Offset applicability.

<b>Source Status</b>
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The table below summarizes the potential to emit of the entire source, prior to the proposed modification, after consideration of all enforceable limits established in the effective permits:

Process/emission unit	Potential to Emit <sup>(a)</sup> (tons/year)					
	PM	PM-10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>
Gel Coat (GSB4, GSB5, GSB6)	94.35	94.35	0	Less than 244  <sup>(c)</sup> includes units STB5, STB6, and STB12)	0	0
Resin and Foam Filling (STB1, STB2, STB3, STB4)			0		0	0
IMRON Paint Spray (SB1, SB2, SB3, SB4, SB5)			0		0	0
Lamination and Foam Filling (AV2, AV3, AV4, AV5, AV6, AV7, AV8, AV9)			0		0	0
Paint Spray (SB6, SB7, SB8)			0		0	0
Gel Coating/Resin (STB7, STB8, STB9, STB10, STB11)			0		0	0
Assembly, Subassembly, Upholstery (AU1)			0		0	0
Insignificant Activities: Gas Heaters, Trimmers, Wood/plastic working shop			0.15	1.3	20.4	24.2
Insignificant Mold-making	--	Less than 4.0	--	--		
Gel Coating/Resin (STB5, STB6, STB12) (permitted in MSM No. 001-15840-00031)	0.1		0	(see (c) above)	0	0
<b>Total PTE</b>	<b>94.45</b>	<b>94.45</b>	<b>0.15</b>	<b>Less than 250<sup>(b)</sup></b>	<b>20.4</b>	<b>24.2</b>

- (a) PTE based on technical source documents for T001-5903-00031, SSM 001-11987-00031, MSM 001-15840-00031.
- (b) Pursuant to MPM No. 001-21331-00031, the VOC from the gelcoat/resin/paint booths are limited to 244 tons per twelve consecutive months, which shall keep the source-wide VOC below 250 tons per year.

The table below summarizes the potential to emit HAPs for the entire source, prior to the proposed modification, after consideration of all enforceable limits established in the effective permits:

HAPs	Potential To Emit (tons/year) <sup>1</sup>
Styrene	Greater than 10
Toluene	Less than 10
MMA	Less than 10
Glycol Ethers	Less than 10
Methanol	Less than 10
Combination HAPs	Greater than 25

<sup>1</sup> Pursuant to Significant Source Modification 001-11987-00031 and Minor Source Modification 001-15840-00031, emission units STB5, STB6, STB7, STB8, STB9, STB10, STB11 and STB12 were limited to less than 100 tons of HAPs per twelve consecutive month period, based on 326 IAC 2-4.1. This limit has been deleted in this permit modification, since the requirements of 326 IAC 2-4.1 have been replaced by the Boat Manufacturing NESHAP (40 CFR 63, Subpart VVVV).

- (a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1).
- (b) This existing source is a major source of HAPs, as defined in 40 CFR 63.41, because HAP emissions are greater than ten (10) tons per year for a single HAP (Styrene) and greater than twenty-five (25) tons per year for a combination of HAPs. Therefore, this source is a major source under Section 112 of the Clean Air Act (CAA).

**Description of Proposed New Source Construction**

The Office of Air Quality (OAQ) has reviewed a new source construction application, submitted by Thunderbird Products on December 28, 2005, relating to the addition of some gel coating and resin application booths. The following is a list of the proposed emission units and pollution control devices:

- (1) Eight (8) gel coating/resin booths, identified as STB13 (exhausting to vent 043), STB14 (exhausting to vent 044), STB15 (exhausting to vent 045), STB16 (exhausting to vent 046), STB17 (exhausting to vent 047), STB18 (exhausting to vent 048), STB20 (exhausting to vent 050), and STB21 (exhausting to vent 051), constructed in 2006, with a maximum capacity of 0.0057 boat per hour per booth, using dry filters as PM control.
- (2) Two (2) gel coating/resin booths, identified as STB19 (exhausting to vent 049) and STB24 (exhausting to vent 054), constructed in 2006, with a maximum capacity of 0.02 boat per hour per booth, using dry filters as PM control.
- (3) One (1) gel coating/resin booth, identified as STB22, constructed in 2006, with a maximum capacity of 0.0125 boat per hour, using dry filters as PM control, exhausting to vent 052.
- (4) One (1) gel coating/resin booth, identified as STB23, constructed in 2006, with a maximum capacity of 0.0167 boat per hour, using dry filters as PM control, exhausting to vent 53.
- (5) One (1) gel coating booth, identified as GSB3, constructed in 2006, with a maximum capacity of ten (10) boat molds per year, using dry filters as PM control, exhausting to vent 042.

- (6) Five (5) natural gas-fired air make-up units, with a total rated capacity of 13.20 mmBTU/hr.

**Enforcement Issues**

There are no pending enforcement actions related to this modification.

**Vent Summary**

Vent ID	Operation	Temperature (°F)
042	GSB3 (Gelcoat Stationary Booth)	Ambient
043-054	STB13-STB24 (Gelcoat/Resin Stationary Booth)	Ambient

**Emission Calculations**

See Appendix A of this document for detailed emission calculations for the proposed emission units STB13 through STB24, and GSB3.

**Source and Permit Modification Level Determination – Part 70**

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

The following table is used to determine the appropriate permit level under 326 IAC 2-7-10.5. This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	1.35
PM10	1.35
SO <sub>2</sub>	Negligible
VOC	34.55 <sup>1</sup>
CO	4.90
NO <sub>x</sub>	5.80

<sup>1</sup> Source has requested that the proposed emissions units be included in the VOC limit of 244 tons per year from the significant emission units (included in Sections D.1 and D.2 of this permit modification)

HAPs	Potential To Emit (tons/year)
Styrene	32.83
MMA	1.42
Combination HAPs	34.55

This source modification has the potential to emit greater than twenty-five (25) tons per year of VOC, and greater than ten (10) tons per year and twenty-five (25) tons per year of single and

combined HAPs, respectively. The emissions units are of the same type that are already permitted, but are subject to the requirements of the Boat Manufacturing NESHAP, 40 CFR 63, Subpart VVVV, which are not included in the Part 70 permit. Therefore, a Minor Source Modification cannot be issued under 326 IAC 2-7-10.5(d), and a Significant Source Modification will be issued pursuant to 326 IAC 2-7-10.5(f).

The Significant Source Modification will be incorporated into the Part 70 permit through a Significant Permit Modification procedure, in accordance with 326 IAC 2-7-12(d)(1), which states in part that a significant permit modification procedure “shall be used for applications requesting Part 70 permit modifications that do not qualify as minor permit modifications or as administrative amendments.”

**Permit Level Determination – PSD or Emission Offset**

The table below summarizes the potential to emit, reflecting all limits, of the proposed emission units. Any control equipment is considered federally enforceable only after issuance of this Part 70 permit modification, and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/Emission Unit	Potential to Emit (tons per year)					
	PM	PM10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>
STB13 – STB24	0.45	0.45	0.00	27.32	0.00	0.00
GSB3	0.50	0.50	0.00	6.93	0.00	0.00
Heaters	0.40	0.40	0.00	0.30	4.90	5.80
Total for Modification	1.35	1.35	0.00	34.55	4.90	5.80
Significant Level or Major Source Threshold	250.00	250.00	250.00	250.00	250.00	250.00

This modification to an existing minor stationary source is not major because the emissions increases are less than the PSD major source thresholds. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

**Federal Rule Applicability Determination**

The following are the federal rule applicabilities for the new gel coating/resin booths STB13-STB24, and the gelcoating booth GSB3, and modifications to federal rule applicabilities for existing units already permitted under Part 70 permit No. T001-5903-00031:

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this proposed modification.
- (b) The National Emissions Standards for Hazardous Air Pollutants (NESHAP)(326 IAC 20 and 40 CFR 63) for the Shipbuilding and Ship Repair source category (i.e., 40 CFR 63.780 - 63.788, Subpart II) does not apply to this source since the rule does not include pleasure craft manufacturing (i.e., this source) as an affected source.
- (c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Plastic Parts and Products (40 CFR 63, Subpart PPPP) are not applicable to this source. Pursuant to 40 CFR 63.4481(c)(15) the requirements of 40 CFR 63, Subpart PPPP do not apply to sources that are subject to 40 CFR 63, Subpart VVVV and do not apply to post-mold surface coating of personal watercraft or parts of personal watercraft, as defined in 40 CFR

63.4581.

- (d) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) - Reinforced Plastics Composites Production (40 CFR 63, Subpart WWWW and 326 IAC 20-56) are not applicable to this source. Pursuant to 40 CFR 63.5787(b), sources that are subject to 40 CFR 63, Subpart VVVV and use all of the reinforced plastics composites manufactured onsite in manufacturing of fiberglass boats, are not subject to the requirements of 40 CFR 63, Subpart WWWW.
- (e) The source is subject to 40 CFR 63, Subpart VVVV (incorporated into 326 IAC 20-48) because it is a fiberglass boat manufacturing facility and is a major source of HAP (has the potential to emit 10 tons or more per year of a single HAP or 25 tons or more per year of a combination of HAPs). As an existing fiberglass boat manufacturing facility that is a major source of HAPs, the source must comply with the provisions of 40 CFR 63, Subpart VVVV on and after August 23, 2004.

The twelve (12) gel coating/resin booths included in this significant source modification, identified as STB13-STB24, and the gel coating booth identified as GSB3, must comply with the requirements of the Boat Manufacturing NESHAP (40 CFR 63, Subpart VVVV), which is incorporated by reference as 326 IAC 20-48, immediately upon startup.

The new emission units subject to this rule include the following:

- (1) Eight (8) gel coating/resin booths, identified as STB13 (exhausting to vent 043), STB14 (exhausting to vent 044), STB15 (exhausting to vent 045), STB16 (exhausting to vent 046), STB17 (exhausting to vent 047), STB18 (exhausting to vent 048), STB20 (exhausting to vent 050), and STB21 (exhausting to vent 051), constructed in 2006, with a maximum capacity of 0.0057 boat per hour per booth, using dry filters as PM control.
- (2) Two (2) gel coating/resin booths, identified as STB19 (exhausting to vent 049) and STB24 (exhausting to vent 054), constructed in 2006, with a maximum capacity of 0.02 boat per hour per booth, using dry filters as PM control.
- (3) One (1) gel coating/resin booth, identified as STB22, constructed in 2006, with a maximum capacity of 0.0125 boat per hour, using dry filters as PM control, exhausting to vent 052.
- (4) One (1) gel coating/resin booth, identified as STB23, constructed in 2006, with a maximum capacity of 0.0167 boat per hour, using dry filters as PM control, exhausting to vent 053.
- (5) One (1) gel coating booth, identified as GSB3, constructed in 2006, with a maximum capacity of ten (10) boat molds per year, using dry filters as PM control, exhausting to vent 042.

The existing emission units subject to the NESHAP, 40 CFR 63, Subpart VVVV are:

- (6) Three (3) gel coating booths, identified as GSB4, GSB5, and GSB6, constructed in 1988, with a maximum capacity of 0.13 boats per hour per booth, using dry filters as PM control, and exhausting to stacks/vents #10, #11, and #12, respectively.
- (7) Four (4) stationary resin and foam filling booths, identified as STB1, STB2, STB3, and STB4, constructed in 1988, with a maximum capacity of 0.005 boats per hour per booth, using dry filters as PM control, and exhausting to stacks/vents #13, #14, #15, and #16.
- (8) Six (6) IMRON paint spray booths for coating fiberglass, identified as SB1, SB2, SB3, SB4, SB5, constructed in 1988, and SB9, constructed in 2005, with a maximum capacity of 0.078 boats per hour per booth, using dry filters as PM control, and exhausting to stacks/vents #18, #19, #20, #21, #22, and #41.

- (9) Eight (8) lamination and foam filling areas, identified as AV2, AV3, AV4, AV5, AV6, AV7, AV8, and AV9, with AV2 through AV7 constructed in 1988, with AV8 constructed in 2000, and AV9 constructed in 2002, with a maximum capacity of 0.13 boats per hour per area, using dry filters as PM control, and exhausting to stacks/vents #3, #4, #5, #6, #7, #8, #9, and #38.
- (10) Eight (8) booths for gel coating/resin applications, identified as STB5 through STB12, with STB7 through STB11 constructed in 2000, and STB5, STB6, and STB12 constructed in 2002, with a maximum capacity of 0.025 boats per hour per booth, using dry filters as PM control, and exhausting to stacks/vents #27, #28, #29, #30, #31, #32, #36, and #37, respectively.
- (11) Three (3) paint spray booths for coating fiberglass, identified as SB6, SB7, and SB8, constructed in 2000, each with a maximum capacity of 0.025 boats per hour per booth, using dry filters as PM control, and exhausting to stacks/vents #33, #34, and #35, respectively.
- (12) One (1) assembly, subassembly, upholstery area, constructed in 2000, with a maximum capacity of processing 0.25 boat units per hour, and exhausting to the atmosphere.
- (13) Mold making and repair activities using tooling resins and gelcoats.

Nonapplicable portions of the NESHAP will not be included in the permit.

The source, including the proposed emission units STB13 through STB24, and GSB3 are subject to the following portions of Subpart VVVV:

- 40 CFR 63.5689(a) through (e)
- 40 CFR 63.5698
- 40 CFR 5701(a)(1)
- 40 CFR 5704 through 40 CFR 63.5710
- 40 CFR 63.5731 through 40 CFR 63.5737
- 40 CFR 63.5758(a)
- 40 CFR 63.5761
- 40 CFR 67(a), (b), and (c)(1)
- 40 CFR 63.5770
- 40 CFR 63.5773
- 40 CFR 63.5776
- 40 CFR 63.5779

- (f) Pursuant to 40 CFR 64.2 (b)(1)(i), emission units at a source are exempt from the requirements of Compliance Assurance Monitoring (CAM) (40 CFR 64), if the emission units are regulated under emission limitations or standards (NSPS or NESHAP) proposed by the Administrator after November 15, 1990. All the significant emission units at this source, including the proposed booths identified as STB13-STB24, and GSB3, are regulated under emission limitations or standards proposed by the administrator after November 15, 1990, and are not subject to the requirements of CAM.

The remaining federal rule applicabilities for this source remain unchanged.

<b>State Rule Applicability Determination</b>
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The following are the state rule applicabilities for this source modification, and modifications to state rule applicabilities for existing units already permitted under Part 70 permit No. T001-5903-00031:

326 IAC 2-2 (Prevention of Significant Deterioration)

Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration, PSD), this proposed modification

is not considered a major modification because it the potential to emit of all regulated pollutants are less than the applicable PSD significant emission levels. Thunderbird Products requested the equipment listed in this source modification to be included within their existing minor PSD limit of 244 tons per year for the significant emission units. Therefore, the entire source (i.e., emission units previously permitted under T001-5903-00031 and emission units for this source modification) will be limited to less than 250 tons of VOC emissions per twelve (12) consecutive month period. Therefore, 326 IAC 2-2 is rendered not applicable.

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

The operation of this boat manufacturing source will emit greater than ten (10) tons per year for a single HAP and greater than twenty-five (25) tons per year for a combination of HAPs. Pursuant to 326 IAC 2-4.1-1(b)(2), because all the emission units are specifically regulated by the Boat Manufacturing NESHAP, 40 CFR 63, Subpart VVVV, which was issued pursuant to Section 112(d) of the CAA, all the emission units at this source are exempt from the requirements of 326 IAC 2-4.1.

326 IAC 20-48 (Emission Standards for Hazardous Air Pollutants from Boat Manufacturing)

This source, including the proposed emission units STB13 through STB24, and GSB3, is subject to 326 IAC 20-48 because: it is a fiberglass boat manufacturing facility subject to 40 CFR 63, Subpart VVVV, it is a major source of hazardous air pollutants and it is an existing major source (as defined in 40 CFR 63.5683) as of August 22, 2001.

Pursuant to 326 IAC 20-48, an existing source that is a major source on or before August 22, 2001 shall comply with the requirements of 326 IAC 20-48 by August 23, 2004. The twelve (12) gel coating/resin booths included in this significant source modification, identified as STB13-STB24, and the gel coating booth identified as GSB3, must comply with the applicable requirements of 326 IAC 20-48 upon startup.

326 IAC 20-48 requires the following standards:

- (1) 326 IAC 20-48-2: Pursuant to Section 2 of this rule, the alternative HAP content requirements for gel coat operations:

Gel Coat Application		
Operation	Application Method	Weighted-Average Percent Organic HAP Content (weight percent) Monthly Limit
Pigmented gel coat operations	Atomized (spray)	33 percent
Clear gel coat operations	Atomized (spray)	48 percent
Tooling gel coat operations	Atomized (spray)	40 percent
Pigmented gel coat operations	Nonatomized (nonspray)	40 percent
Clear gel coat operations	Nonatomized (nonspray)	55 percent
Tooling gel coat operations	Nonatomized (nonspray)	54 percent

- (2) 326 IAC 20-48-3: The following work practices are required for the boat fiberglass manufacturing operation:

- (A) Nonatomizing spray equipment shall not be operated at pressures that atomize the material during the application process.
- (B) Solvents sprayed during cleanup and resin changes shall be directed into solvent collection containers.
- (C) For routine flushing of resin and gel coat application equipment, such as spray guns, flowcoaters, brushes, rollers, and squeegees, owners or operators must use a cleaning solvent that contains no hazardous air pollutants (HAPs). However, recycled cleaning solvents that contain less than or equal to five percent (5%) HAP by weight are considered to contain no HAP for the purposes

of this subdivision. For removing cured resin or gel coat from application equipment, no organic HAP limit applies.

- (D) Clean-up rags with solvent shall be stored in closed containers.
- (E) Closed containers shall be used for the storage of the following:
  - (i) All production and tooling resins that contain HAPs.
  - (ii) All production and tooling gel coats that contain HAPs.
  - (iii) Waste resins and gel coats that contain HAPs.
  - (iv) Cleaning materials, including waste cleaning materials.
  - (v) Other materials that contain HAPs.

The covers of the closed containers must have no visible gaps and must be in place at all times, except when equipment is placed in or removed from the container.

(3) 326 IAC 20-48-4: Operator Training

- (A) The Permittee shall train all new and existing personnel, including contract personnel, who are involved in resin and gel coat spraying and applications that could result in excess emissions if performed improperly according to the following schedule:
  - (i) All personnel hired shall be trained within fifteen (15) days of hiring.
  - (ii) To ensure training goals listed in subsection (b) are maintained, all personnel shall be given refresher training annually.
  - (iii) Personnel who have been trained by another owner or operator subject to this rule are exempt from subdivision (1) if written documentation that the employee's training is current is provided to the new employer.
- (B) The lesson plans shall cover, for the initial and refresher training, at a minimum, all of the following topics:
  - (i) Appropriate application techniques.
  - (ii) Appropriate equipment cleaning procedures.
  - (iii) Appropriate equipment setup and adjustment to minimize material usage and overspray.
- (C) The Permittee shall maintain the following training records on site and available for inspection and review:
  - (i) A copy of the current training program.
  - (ii) A list of all current personnel, by name, that are required to be trained and the dates they were trained and the date of the most recent refresher training.
- (D) Records of prior training programs and former personnel are not required to be maintained.

326 IAC 8-1-6 (New Facilities, General Reduction Requirements)

The potential VOC emissions from each of the proposed gel coating/resin booths STB13 through STB24, and gel coating booth GSB3, are less than than twenty-five (25) tons per year. Therefore 326 IAC 8-1-6 does not apply to booths STB13 through STB24, and GSB3.

The existing gel coating booths (identified as GSB4, GSB5, and GSB6), resin and foam filling booths (identified as STB1, STB2, STB3, and STB4), IMRON paint spray booths (identified as SB1, SB2, SB3, SB4 and SB5), and lamination and foam filling areas (identified as AV2, AV3, AV4, AV5, AV6, AV7, AV8, and AV9), permitted under either Part 70 permit No. T001-5903-00031, or under SSM No. 001-11987-00031, each have potential VOC emissions below twenty-five (25) tons per year. Therefore, 326 IAC 8-1-6 does not apply to these existing booths.

The existing gel coating/resin application booths (identified as STB5, STB6, and STB12), which are similar to booths identified as STB1 through STB4 and were permitted under MSM No. 001-15840-00031, each have potential VOC emissions below twenty-five (25) tons per year. Therefore, 326 IAC 8-1-6 does not apply to these existing booths. The paint booth identified as

SB6, originally permitted under SSM No. 001-11987-00031, but not constructed, and added under MSM No. 001-15840-0031, has potential VOC emissions below twenty-five (25) tons per year, and is not subject to 326 IAC 8-1-6.

The existing assembly, subassembly, and upholstery area, as one facility, identified as AU1, was constructed after January 1, 1980 and has potential VOC emissions greater than 25 tons per year.

Pursuant to SSM 001-11987-00031, issued October 6, 2000, the assembly, subassembly, and upholstery area (identified as AU1) shall comply with the following BACT requirements:

- (1) The VOC content of the adhesives and sealants applied shall not exceed 9.5 pounds per gallon less water.
- (2) The total VOC input to the assembly, subassembly, upholstery area, including any cleanup solvents, shall not exceed 55.9 tons per twelve (12) consecutive month period.
- (3) 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.

**326 IAC 20-25 (Emissions from Reinforced Plastics Composites Fabricating Emission Units)**

Pursuant to 326 IAC 20-25-1(c), since this boat manufacturing source is subject to the NESHAP, 40 CFR 63, Subpart VVVV, it is exempt from the requirements of 326 IAC 20-25.

**326 IAC 6-3-2(d) (Particulate Matter (PM))**

Pursuant to 326 IAC 6-3-2(d), overspray from gel coating/resin booths STB13 through STB24, and gel coating booth GSB3 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.

All other state rule applicabilities shall remain unchanged.

<b>Compliance Determination and Monitoring Requirements</b>
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Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a 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 Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

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

The Compliance Determination Requirements applicable to this modification are as follows:

- (1) Pursuant to 326 IAC 6-3-2(d), overspray from gel coating/resin booths STB13 through STB24, and gel coating booth GSB3 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.
- (2) Compliance with the source-wide VOC emission limit of 244 tons per year 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.

- (3) Compliance determination requirements as specified in the Boat Manufacturing NESHAP, 40 CFR 63, Subpart VVVV.
- (4) Compliance with the HAP monomer content limitation under 326 IAC 20-48-2 shall be determined using one (1) of the following:
  - (a) The manufacturer's certified product data sheet.
  - (b) The manufacturer's material safety data sheet.
  - (c) Sampling and analysis, using any of the following test methods, as applicable:
    - (i) 40 CFR 60, Method 24, Appendix A\*, shall be used to measure the total volatile HAP content of resins and gel coats. Method 24 may be modified for measuring the volatile HAP content of resins or gel coats to require that the procedure be performed on uncatalyzed resin or gel coat samples.
    - (ii) 40 CFR 63, Method 311, Appendix A\*, shall be used to measure HAP content in resins and gel coats by direct injection into a gas chromatograph.
    - (iii) An alternative test method approved by IDEM, OAQ.

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

- (1) The gel coating/resin booths, STB13 through STB24, using dry filters for PM control, and exhausting to vents 43 through 54, and the gel coating booth GSB3, using dry filter for PM control, and exhausting to vent 42, have applicable compliance monitoring conditions as specified below:
  - (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth vents 43 through 54 while one or more of the booths STB13 through STB24 that exhaust to these vents are in operation, and vent 42 while GSB3 is in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C – Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C – Response to Excursions or Exceedances, shall be considered a violation of deviation from this permit.
  - (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps in accordance with Section C – Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C – Response to Excursions or Exceedances shall be considered a deviation from this permit.

These monitoring conditions are necessary because the dry filters for the gel coating and resin application processes must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

- (2) Monitoring and record keeping of the VOC usage to demonstrate compliance with the minor VOC limit to avoid 326 IAC 2-2, Prevention of Significant Deterioration (PSD) requirements.
- (3) Additional monitoring and recordkeeping as required by the Boat Manufacturing NESHAP, 40 CFR 63, Subpart VVVV, and 326 IAC 20-48.

### Proposed Changes

The changes listed below have been made to Part 70 Operating Permit No. T001-5903-00031. Deleted language appears as ~~strike throughs~~ and new language appears in **bold**:

#### Change No. 1.

Section A.1 is modified as follows:

#### 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~~ **Plant Manager**  
Source Address: 2200 Monroe Street, Decatur, IN 46733  
Mailing Address: 2200 Monroe Street, Decatur, IN 46733  
Phone Number: (219) 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

#### Change No. 2.

Section A.2 has been modified as follows to add the new emission units:

#### 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, **constructed in 1988**, with a maximum capacity of 0.3 boats per hour per booth, using dry filters as **PM** 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, **constructed in 1988**, with a maximum capacity of 0.03 boats per hour per booth, using dry filters as **PM** 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, **constructed in 1988**, and SB9, **constructed in 2005**, with a maximum capacity of 0.25 boats per hour per booth, using dry filters as **PM** control, and exhausting to stacks/vents, #18, #19, #20, #21, and #22.
- (d) Eight (8) lamination and foam filling areas, identified as AV2, AV3, AV4, AV5, AV6, AV7, AV8, and AV9, **with AV2 through AV7 constructed in 1988, with AV8 constructed in 2000, and AV9 constructed in 2002**, with a maximum capacity of 0.13 boats per hour per area, using dry filters as PM 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 STB7 through STB11 constructed in 2000, and STB5, STB6 and STB12 constructed in 2002**, each with a maximum capacity of 0.025 boat units per hour, each using dry filters as **PM** control.
- (f) Three (3) paint spray booths, identified as SB6, SB7, and SB8, **constructed in 2000**, each with a maximum capacity of 0.025 boat units per hour, each using dry filters as **PM** control, and each exhausting to stacks/vents #033, #034, and #035, respectively.
- (g) One (1) assembly, subassembly, upholstery area, **constructed in 2000**, with a maximum capacity of processing 0.25 boat units per hour, and exhausting to four (4) vents,

- identified as #037, #038, #039 and #040.
- (h) **Eight (8) gel coating/resin booths, identified as STB13 (exhausting to vent 043), STB14 (exhausting to vent 044), STB15 (exhausting to vent 045), STB16 (exhausting to vent 046), STB17 (exhausting to vent 047), STB18 (exhausting to vent 048), STB20 (exhausting to vent 050), and STB21 (exhausting to vent 051), constructed in 2006, with a maximum capacity of 0.0057 boat per hour per booth, using dry filters as PM control.**
  - (i) **Two (2) gel coating/resin booths, identified as STB19 (exhausting to vent 049) and STB24 (exhausting to vent 054), constructed in 2006, with a maximum capacity of 0.02 boat per hour per booth, using dry filters as PM control.**
  - (j) **One (1) gel coating/resin booth, identified as STB22, constructed in 2006, with a maximum capacity of 0.0125 boat per hour, using dry filters as PM control, exhausting to vent 052.**
  - (k) **One (1) gel coating/resin booth, identified as STB23, constructed in 2006, with a maximum capacity of 0.0167 boat per hour, using dry filters as PM control, exhausting to vent 053.**
  - (l) **One (1) gel coating booth, identified as GSB3, constructed in 2006, with a maximum capacity of ten (10) boat molds per year, using dry filters as PM control, exhausting to vent 042.**

*Change No. 3.*

Section A.3 is modified as follows:

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

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This stationary source also includes the following insignificant activities which are specifically regulated, 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) 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 and exhausting to stack/vent, #17.
  - (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.
- (h) Paved and unpaved roads and parking lots with public access.
- (i) **Five (5) natural gas-fired air make-up units, with a total rated capacity of 13.20 mmBTU/hr.**

*Change No. 4.*

Condition B.1 (Permit No Defense), B.9 (Compliance with Conditions), B.15(Multiple Exceedances) and B.21 (Changes Under 502(b)(10) of the Clean Air Act) have been deleted and replaced by other Section B

conditions. Condition B.3 (Permit Term) has been updated as follows to clarify the condition, and Condition B.4 (Term of Condition) has been added. Condition B.13 (Permit Shield) has been modified to clarify the condition. Condition B.14 (Prior Permit Superseded) has been added and B.18 (Permit Renewal) have been changed to clarify these conditions. Condition B.8 (Duty to Supplement and Provide Information) has been updated to clarify the condition. The Table of Contents has been modified to reflect changes to the condition titles.

~~B.1 Permit No Defense [IC 13]~~

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- ~~(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.32 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5] **[326 IAC 2-7-4(a)(1)(D)] [IC 13-15-3-6(a)]**~~

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- ~~(a) This permit, **T001-5903-00031**, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. **Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit or of permits issued pursuant to Title IV of the Clean Air Act and 326 IAC 21 (Acid Deposition Control).**~~
- ~~(b) **If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.**~~

~~B.3 Term of Condition [326 IAC 2-1.1-9.5]~~

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~~Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:~~

- ~~(a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or~~
- ~~(b) the emission unit to which the condition pertains permanently ceases operation.~~

~~B.9 8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]~~

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- ~~(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.

- (a) **The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.**
- (b) **For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.**

~~B.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.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]~~

- ~~(a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that 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 either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced 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 or for applicable requirements for which a permit shield has been granted.~~

~~This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.~~

- ~~(b) 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, 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.~~

- ~~(c) 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. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.~~
- ~~(d) 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.~~~~
- ~~(e) 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).~~
- ~~(f) 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)]~~
- ~~(g) 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)(8)]~~

- 
- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that 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 either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced 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 or for applicable requirements for which a permit shield has been granted.**

**This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.**

- (b) 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, 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.**

- (c) **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. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.**
- (d) **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.**
- (e) **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).**
- (f) **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)]**
- (g) **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)(8)]**

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

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~~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.14 Prior Permits Superseded [326 IAC 2-1.1-9.5] [326 IAC 2-7-10.5]**

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- (a) **All terms and conditions of permits established prior to T001-5903-00031 and issued pursuant to permitting programs approved into the state implementation plan have been either**
  - (1) **incorporated as originally stated,**
  - (2) **revised under 326 IAC 2-7-10.5, or**
  - (3) **deleted under 326 IAC 2-7-10.5.**
- (b) **Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit, except for permits issued pursuant to Title IV of the Clean Air Act and 326 IAC 21 (Acid Deposition Control).**

**B.1417 Permit Renewal [326 IAC 2-7-3] [326 IAC 2-7-4] [326 IAC 2-7-8(e)]**

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- (a) **The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-7-4. 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). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana ~~46204-2251~~ 46206-6015

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

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

~~(A) (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and~~

~~(B) (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.~~

~~(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.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).~~

*Change No. 5.*

IDEM has determined that the Permittee is not required to keep records of all preventive maintenance. However, where the Permittee seeks to demonstrate that an emergency has occurred, the Permittee must provide, upon request, records of preventive maintenance in order to establish that the lack of proper maintenance did not cause or contribute to the deviation. Therefore, IDEM has deleted paragraph (b) of Section B – Preventive Maintenance, and has amended the Section B – Emergency Provisions condition as follows:

**B.4211 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, P. O. Box 6015  
Indianapolis, Indiana ~~46204-2251~~ 46206-6015

- ~~(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.~~
- (b) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).**
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.**
- ~~(c) PMP’s shall be submitted to IDEM, OAQ, upon request and shall be subject to review and approval by IDEM, OAQ.~~

**B.4312 Emergency Provisions [326 IAC 2-7-16]**

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- (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, P. O. Box 6015  
Indianapolis, Indiana ~~46204-2251~~ 46206-6015

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) **The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not**

**cause or contribute to an exceedance of any limitations on emissions. However,** IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(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) 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.
- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.
- ~~(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.~~

*Change No. 6.*

The Section B – Operational Flexibility condition has been modified as follows:

B.20 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 **limitations provided in 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, P. O. Box 6045

Indianapolis, Indiana ~~46204-2251~~ 46206-6045

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site, **on a rolling five (5) year basis**, which document, ~~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 **emissions** increases and decreases ~~at 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.

*Change No. 7.*

Section B - Construction Permit Requirement is modified as follows to clarify the condition:

~~B.23 — Construction Permit Requirement [326 IAC 2]~~

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~~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.21 Source Modification Requirement [326 IAC 2-7-10.5]**

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**A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-7-10.5.**

*Change No. 8.*

Indiana was required to incorporate credible evidence provisions into state rules consistent with the SIP call published by U.S. EPA in 1997 (62 FR 8314). Indiana has incorporated the credible evidence provision in 326 IAC 1-1-6. This rule became effective on March 16, 2005; therefore, the Credible Evidence condition has been added to Section B as follows:

**B.25 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314][326 IAC 1-1-6]**

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**For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.**

*Change No. 9.*

Condition C.6 (Operation of Equipment) is the same as Conditions D.1.6 and D.2.4, which require the source to operate the control equipment at all times. Condition C.6 is deleted to avoid this duplication, and the subsequent Section C conditions have been renumbered.

~~C.6 — Operation of Equipment [326 IAC 2-7-6(6)]~~

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~~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.~~

*Change No. 10.*

Section C (Compliance Schedule) is deleted and replaced by Compliance Requirements as follows:

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

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~~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.8 Compliance Requirements [326 IAC 2-1.1-11]**

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**The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.**

*Change No. 11.*

Section C – Compliance Monitoring condition has been updated as follows to clarify the condition:

~~C.109 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]~~

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~~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).~~

**Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:**

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

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

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

**Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.**

*Change No. 12.*

Section C – Maintenance of Monitoring Equipment has been replaced by other Section C conditions. Therefore, this condition has been deleted as follows:

~~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.~~

*Change No. 13.*

IDEM realizes that instrument specifications can only be practically applied to analog units, and has therefore clarified the condition to state that the condition only applies to analog units. Upon further review, IDEM has also determined that the accuracy of the instruments is not nearly as important as to whether the instrument has a range that is appropriate for the normal expected reading of the parameter. Therefore, the accuracy requirements have been removed from the condition. Section C – Pressure Gauge Specifications has been replaced with the Instrument Specifications condition as follows:

~~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.~~

**C.11 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**

- (a) **When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale and be accurate.**
- (b) **The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.**

*Change No. 14.*

Section C – Risk Management Plan has been updated as follows:

~~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.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]**

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

*Change No. 15.*

The Permittee has already submitted an Emergency Reduction Plan. Section C – Emergency Reduction Plan has been updated as follows:

~~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.12 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 prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on December 16, 1999.**

**(c) 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]**

*Change No. 16.*

Additional changes to compliance monitoring conditions are included later in this document, which affect the existing and new emission units. Emission units in D sections have been rearranged, which affect these compliance monitoring conditions. Therefore, the D section facility description changes are described as follows.

The existing emission units under Section D.1, D.2, and D.3 are all subject to the requirements of the Boat Manufacturing NESHAP and 326 IAC 20-48. All the Section D.2 and D.3 emission units have been

included in a revised Section D.1 as follows. Section D.2 and D.3 have been deleted in their entirety.

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

- (a) Three (3) gel coating booths, identified as GSB4, GSB5, and GSB6, **constructed in 1988**, with a maximum capacity of 0.13 boats per hour per booth, using dry filters as **PM** control, and exhausting to stacks/vents #10, #11, and #12, respectively.
- (b) Four (4) stationary resin and foam filling booths, identified as STB1, STB2, STB3, and STB4, **constructed in 1988**, with a maximum capacity of 0.005 boats per hour per booth, using dry filters as **PM** control, and exhausting to stacks/vents #13, #14, #15, and #16.
- (c) Six (6) IMRON paint spray booths for coating fiberglass, identified as SB1, SB2, SB3, SB4, SB5, **constructed in 1988**, and SB9, **constructed in 2005**, with a maximum capacity of 0.078 boats per hour per booth, using dry filters as **PM** 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 AV2 through AV7 constructed in 1988, with AV8 constructed in 2000, and AV9 constructed in 2002**, with a maximum capacity of 0.13 boats per hour per area, using dry filters as **PM** control, and exhausting to stacks/vents #3, #4, #5, #6, #7, #8, #9, and #38.
- (e) **Eight (8) booths for gel coating/resin applications, identified as STB5 through STB12, with STB7 through STB11 constructed in 2000, and STB5, STB6 and STB12 constructed in 2002, with a maximum capacity of 0.025 boats per hour per booth, using dry filters as PM control, and exhausting to stacks/vents #27, #28, #29, #30, #31, #32, #36, and #37, respectively.**
- (f) **Three (3) paint spray booths for coating fiberglass, identified as SB6, SB7, and SB8, constructed in 2000, each with a maximum capacity of 0.025 boats per hour per booth, using dry filters as PM control, and exhausting to stacks/vents #33, #34, and #35, respectively.**
- (g) **One (1) assembly, subassembly, upholstery area, constructed in 2000, with a maximum capacity of processing 0.25 boat units per hour, and exhausting to the atmosphere.**

**Insignificant Activities**

**Other activities or categories not previously identified with emissions below insignificant thresholds:**

- (1) **Mold making and repair activities using tooling resins and gelcoats.**
- (2) **Use of organic peroxide catalysts in resin and gelcoat application areas.**

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

*Change No. 17.*

IDEM has reconsidered the requirement to develop and follow a Compliance Response Plan. The Permittee will still be required to take reasonable response steps when a compliance monitoring parameter is determined to be out of range or abnormal. Replacing the requirement to develop and follow a Compliance Response Plan with a requirement to take reasonable response steps will ensure that the control equipment is returned to proper operation as soon as practicable, while still allowing the Permittee the flexibility to respond to situations that were not anticipated. The Section D conditions that refer to this

condition have been revised to reflect the new condition title.

Upon further review, IDEM has determined that it is the Permittee's responsibility to include routine control device inspection requirements into the preventive maintenance plan. Since the Permittee is in the best position to determine the appropriate frequency of control device inspections and the details regarding which components of the control device should be inspected, the requirement to keep records of the inspections has been removed. The following changes have been made to the Section C and D conditions:

~~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.14 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]**

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- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.**
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:**
- (1) initial inspection and evaluation;**
  - (2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or**
  - (3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.**
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:**
- (1) monitoring results;**
  - (2) review of operation and maintenance procedures and records;**
  - (3) inspection of the control device, associated capture system, and the process.**
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.**
- (e) The Permittee shall maintain the following records:**
- (1) monitoring data;**
  - (2) monitor performance data, if applicable; and**
  - (3) corrective actions taken.**

#### **D.1.10 Monitoring**

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- (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. **To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks associated with STB5 through STB12 while one or more of the booths are in operation. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks associated with paint spray booths SB6, SB7, and SB8, while one or more of the booths are in operation.** The Compliance Response Plan shall be followed whenever ~~If~~ a condition exists which should result in a response step, **the Permittee shall take reasonable response steps in accordance with Section C – Response to Excursions or Exceedances.** Failure to take response steps in accordance with Section C – **Response to Excursions or Exceedances** Compliance Monitoring Plan—Failure to Take Response Steps, shall be considered a violation of **deviation from** 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~~ **When there is** a noticeable change in overspray emissions, or **when** evidence of overspray emissions is observed, **the Permittee shall take reasonable response steps in accordance with Section C – Response to Excursions or Exceedances.** ~~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 – **Response to Excursions or Exceedances** Compliance Monitoring Plan—Failure to Take Response Steps, shall be considered a violation of **deviation from** this permit.
- ~~(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.~~

#### D.1.11 Record Keeping Requirements

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- (a) To document compliance with Conditions D.1.1 and 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.1.10, the Permittee shall maintain a log of daily overspray observations, **and** 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.

*Change No. 18.*

Section C – Actions Related to Noncompliance Demonstrated by a Stack Test, has been updated to clarify the condition:

C.15 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).~~

- (c) **IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.**

**The response action documents submitted pursuant to this condition do require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).**

*Change No. 19.*

Section C – Monitoring Data Availability has been replaced with other Section C conditions related to compliance monitoring requirements. Therefore, Section C – Monitoring Data Availability has been deleted as follows:

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.~~

*Change No. 20.*

The Section C – Recordkeeping and Reporting conditions have been updated as follows:

C.2017 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.~~ **Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.**
- (b) **Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. 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.2418 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.~~

**(a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by 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 46204-2251**

**(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the**

**envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.**

- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).**
- (e) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit “calendar year” means the twelve (12) month period from January 1 to December 31 inclusive.**

*Change No. 21.*

The applicable requirements under Stratospheric Ozone Protection have been added to Section C as follows:

**Stratospheric Ozone Protection**

**C.19 Compliance with 40 CFR 82 and 326 IAC 22-1**

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**Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:**

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.**
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.**
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.**

*Change No. 22.*

The operation of this boat manufacturing source will emit greater than ten (10) tons per year for a single HAP and greater than twenty-five (25) tons per year for a combination of HAPs. However, pursuant to 326 IAC 2-4.1-1(b)(2), because all the emission units are specifically regulated by the Boat Manufacturing NESHAP 40 CFR 63, Subpart VVVV, all the emission units at this source are exempt from the requirements of 326 2-4.1 (which included the source-wide HAP limit of 100 tons per year). Upon further review, OAQ has also determined that the requirements of 326 IAC 8-1-6 (BACT) do not apply to the existing gel coating and resin application booths or the existing paint booths. Previously, 326 IAC 8-1-6 was incorrectly applied to these emission units. This error has been corrected in this permit modification and the Section D.1 conditions related to 326 IAC 2-4.1 and 326 IAC 8-1-6 are deleted as follows (all existing emission units are included in the revised section D.1), and the remaining subsections have been renumbered. Condition D.1.6 (renumbered as D.1.9 in this permit modification) has been modified accordingly.

The requirements of the NESHAP, 40 CFR 63, Subpart VVVV have been incorporated in Section E as described later in this document.

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

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~~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.1.69 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAP) [326 IAC 8-1-4][326 IAC 8-2-1(a)]**

~~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.~~

**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) by preparing or obtaining from the manufacturer the copies of the “as supplied” and “as applied” VOC data sheets. Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA-approved form, emission factors shall be taken from the following reference approved by IDEM, OAQ: “Unified Emission Factors for Open Molding of Composites” July 23, 2001, or its updates. The VOC emissions from the paint spray booths, lamination and foam filling areas, and assembly, subassembly and upholstery areas shall be calculated by multiplying the usage of each material by the VOC content as shown on the MSDS. The VOC emissions for dilution solvents and cleanup solvents shall be calculated by multiplying the usage of each solvent by the VOC content as shown on the MSDS. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.**

*Change No. 23.*

The source has requested the new emission units (to be incorporated into Section D.2 of the permit, since the old sections D.2 and D.3 have been entirely deleted) to be included in the source-wide emission limit on VOC. The 326 IAC 2-2 requirements have already been incorporated into the State Implementation Plan. Therefore, the condition for the PSD minor limit in section D.1 has been modified. The requirement in condition D.1.7 has been incorporated into D.1.1, and D.1.7 has been deleted.

D.1.21 PSD Minor Limit [326 IAC 2-2] ~~[40-CFR-52.24]~~

~~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.~~

**In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable, for emissions units included in Sections D.1 and D.2, the use of resins and gel coats at all gel coating and resin application booths, and the VOC input for the paint application booths, lamination and foam filling areas, and assembly, subassembly, and upholstery areas, combined, shall be limited such that the potential to emit (PTE) volatile organic compounds (VOC) shall be less than 244 tons per twelve (12) consecutive months with compliance determined at the end of each month. Compliance with this limit shall be determined based on 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" 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.**

~~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.~~

*Change No. 24.*

The assembly, subassembly, upholstery area, previously included in Section D.3, and now moved to Section D.1, is subject to 326 IAC 8-1-6. The following section has been added accordingly:

**D.1.2 Volatile Organic Compound (VOC) – General Reduction [326 IAC 8-1-6]**

Pursuant to Significant Source Modification 001-11987-00031, issued on October 6, 2000, and 326 IAC 8-1-6, the assembly, subassembly, and upholstery area (identified as AU1) shall comply with the following BACT requirements:

- (1) The VOC content of the adhesives and sealants applied shall not exceed 9.5 pounds per gallon less water.
- (2) 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.
- (3) 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.

*Change No. 25.*

The requirements under 326 IAC 20-48 (Emissions from Fiberglass Boat Manufacturing) have been added to the Emission Limitations and Standards under Section D.1 as follows:

**D.1.3 Emissions from Fiberglass Boat Manufacturing [326 IAC 20-48-2]**

Pursuant to 326 IAC 20-48-2, the Permittee shall comply with the alternative HAP content requirements for gel coat operations:

Operation	Gel Coat Application	
	Application Method	Weighted-Average Percent Organic HAP Content (weight percent) Monthly Limit
Pigmented gel coat operations	Atomized (spray)	33 percent
Clear gel coat operations	Atomized (spray)	48 percent
Tooling gel coat operations	Atomized (spray)	40 percent
Pigmented gel coat operations	Nonatomized (nonspray)	40 percent
Clear gel coat operations	Nonatomized (nonspray)	55 percent
Tooling gel coat operations	Nonatomized (nonspray)	54 percent

Compliance with these HAP monomer content limits shall be demonstrated on a monthly weighted average basis. If all of the gel coats used during a month meet the specified HAP monomer content limits, then maintaining records of content and usage as specified under Condition D.1.11 is sufficient for demonstrating compliance with the HAP monomer content limits.

**D.1.4 Work Practices for Fiberglass Boat Manufacturing [326 IAC 20-48-3]**

Pursuant to 326 IAC 20-48-3, the Permittee shall meet the following work practices:

- (a) Nonatomizing spray equipment shall not be operated at pressures that atomize the material during the application process.
- (b) Solvents sprayed during cleanup and resin changes shall be directed into solvent collection containers.

- (c) **For routine flushing of resin and gel coat application equipment, such as spray guns, flowcoaters, brushes, rollers, and squeegees, owners or operators must use a cleaning solvent that contains no hazardous air pollutants (HAPs). However, recycled cleaning solvents that contain less than or equal to five percent (5%) HAP by weight are considered to contain no HAP for the purposes of this subdivision. For removing cured resin or gel coat from application equipment, no organic HAP limit applies.**
- (d) **Clean-up rags with solvent shall be stored in closed containers.**
- (e) **Closed containers shall be used for the storage of the following:**
  - (1) **All production and tooling resins that contain HAPs.**
  - (2) **All production and tooling gel coats that contain HAPs.**
  - (3) **Waste resins and gel coats that contain HAPs.**
  - (4) **Cleaning materials, including waste cleaning materials.**
  - (5) **Other materials that contain HAPs.**

**The covers of the closed containers must have no visible gaps and must be in place at all times, except when equipment is placed in or removed from the container.**

#### **D.1.5 Operator Training for Boat Manufacturing [326 IAC 20-48-4]**

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**Pursuant to 326 IAC 20-48-4, the Permittee shall:**

- (a) **Train all new and existing personnel, including contract personnel, who are involved in resin and gel coat spraying and applications that could result in excess emissions if performed improperly according to the following schedule:**
  - (i) **All personnel hired shall be trained within fifteen (15) days of hiring.**
  - (ii) **To ensure training goals listed in subsection (b) are maintained, all personnel shall be given refresher training annually.**
  - (iii) **Personnel who have been trained by another owner or operator subject to this rule are exempt from subdivision (1) if written documentation that the employee's training is current is provided to the new employer.**
- (b) **The lesson plans shall cover, for the initial and refresher training, at a minimum, all of the following topics:**
  - (i) **Appropriate application techniques.**
  - (ii) **Appropriate equipment cleaning procedures.**
  - (iii) **Appropriate equipment setup and adjustment to minimize material usage and overspray.**

*Change No. 26.*

Section D.1 recordkeeping and reporting conditions have been modified as follows:

#### **D.1.1140 Record Keeping Requirements**

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- (a) **To document compliance with Condition D.1.1 ~~and~~ D.1.2, **and D.1.3**, 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.1.1.**
  - (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**

- (2) 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.1.10, the Permittee shall maintain a log of daily overspray observations, and daily and weekly inspections.
- (c) **To document compliance with Condition D.1.5, the Permittee shall maintain the following training records on site and available for inspection and review:**
- (1) **A copy of the current training program.**
  - (2) **A list of all current personnel, by name, that are required to be trained and the dates they were trained and the date of the most recent refresher training.**
  - (3) **Records of prior training programs and former personnel are not required to be maintained.**
- (d) ~~(e)~~ All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**D.1.1214 Reporting Requirements**

A quarterly summary of the information to document compliance with Conditions **D.1.1** and 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.

*Change No. 27.*

The testing requirement under D.1.8 has been modified as follows, adding the requirements under 326 IAC 20-48.

**D.1.8 Testing Requirements ~~[326 IAC 2-7-6(1),(6)] [326 IAC 20-48]~~**

~~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.~~

**Compliance with the HAP monomer content limitation in Condition D.1.3 shall be determined using one (1) of the following:**

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

*Change No. 28.*

Condition D.1.6 has been updated as follows:

**D.1.86 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.~~

**Pursuant to 326 IAC 6-3-2(d), particulate from the gel coating booths, resin and foam filling booths, paint spray booths, and gel coating/resin application booths (GSB4, GSB5, GSB6, STB1 through STB12, SB1 through SB8, and AV2 through AV9) shall be controlled by a dry particulate filter, and the Permittee shall operate the control devices in accordance with manufacturer's specifications.**

*Change No. 29.*

Section D.2 is added to the permit for the proposed emission units STB13 through STB24, and GSB3.

**SECTION D.2 FACILITY OPERATION CONDITIONS**

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

- (1) Eight (8) gel coating/resin booths, identified as STB13 (exhausting to vent 043), STB14 (exhausting to vent 044), STB15 (exhausting to vent 045), STB16 (exhausting to vent 046), STB17 (exhausting to vent 047), STB18 (exhausting to vent 048), STB20 (exhausting to vent 050), and STB21 (exhausting to vent 051), constructed in 2006, with a maximum capacity of 0.0057 boat per hour per booth, using dry filters as PM control.**
- (2) Two (2) gel coating/resin booths, identified as STB19 (exhausting to vent 049) and STB24 (exhausting to vent 054), constructed in 2006, with a maximum capacity of 0.02 boat per hour per booth, using dry filters as PM control.**
- (3) One (1) gel coating/resin booth, identified as STB22, constructed in 2006, with a maximum capacity of 0.0125 boat per hour, using dry filters as PM control, exhausting to vent 052.**
- (4) One (1) gel coating/resin booth, identified as STB23, constructed in 2006, with a maximum capacity of 0.0167 boat per hour, using dry filters as PM control, exhausting to vent 053.**
- (5) One (1) gel coating booth, identified as GSB3, constructed in 2006, with a maximum capacity of ten (10) boat molds per year, using dry filters as PM control, exhausting to vent 042.**

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

**General Construction Conditions**

**D.2.1 Permit No Defense**

**This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.**

**D.2.2 Modification to Construction Conditions [326 IAC 2]**

**All requirements of these construction conditions shall remain in effect unless modified in a manner consistent with procedures established for modifications pursuant to 326 IAC 2.**

**Operation Conditions**

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

**D.2.3 PSD Minor Limit [326 IAC 2-2]**

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable, for emissions units included in Sections D.1 and D.2, the use of resins and gel coats at all gel coating and resin application booths, and the VOC input for the paint application booths, lamination and foam filling areas, and assembly, subassembly, and upholstery areas, combined, shall be limited such that the potential to emit (PTE) volatile organic compounds (VOC) shall be less than 244 tons per twelve (12) consecutive months with compliance determined at the end of each month. Compliance with this limit shall be determined based on 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" 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.

**D.2.4 Particulate Matter (PM) [326 IAC 6-3-2(d)]**

Pursuant to 326 IAC 6-3-2(d), overspray from gel coating/resin booths STB13 through STB24, and gel coating booth GSB3 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.2.5 Emissions from Fiberglass Boat Manufacturing [326 IAC 20-48-2]**

Pursuant to 326 IAC 20-48-2, the Permittee shall comply with the alternative HAP content requirements for gel coat operations:

Operation	Gel Coat Application	
	Application Method	Weighted-Average Percent Organic HAP Content (weight percent) Monthly Limit
Pigmented gel coat operations	Atomized (spray)	33 percent
Clear gel coat operations	Atomized (spray)	48 percent
Tooling gel coat operations	Atomized (spray)	40 percent
Pigmented gel coat operations	Nonatomized (nonspray)	40 percent
Clear gel coat operations	Nonatomized (nonspray)	55 percent
Tooling gel coat operations	Nonatomized (nonspray)	54 percent

Compliance with these HAP monomer content limits shall be demonstrated on a monthly weighted average basis. If all of the gel coats used during a month meet the specified HAP monomer content limits, then maintaining records of content and usage as specified under

**Condition D.2.12 is sufficient for demonstrating compliance with the HAP monomer content limits.**

**D.2.6 Work Practices for Fiberglass Boat Manufacturing [326 IAC 20-48-3]**

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**Pursuant to 326 IAC 20-48-3, the Permittee shall meet the following work practices:**

- (a) Nonatomizing spray equipment shall not be operated at pressures that atomize the material during the application process.**
- (b) Solvents sprayed during cleanup and resin changes shall be directed into solvent collection containers.**
- (c) For routine flushing of resin and gel coat application equipment, such as spray guns, flowcoaters, brushes, rollers, and squeegees, owners or operators must use a cleaning solvent that contains no hazardous air pollutants (HAPs). However, recycled cleaning solvents that contain less than or equal to five percent (5%) HAP by weight are considered to contain no HAP for the purposes of this subdivision. For removing cured resin or gel coat from application equipment, no organic HAP limit applies.**
- (d) Clean-up rags with solvent shall be stored in closed containers.**
- (e) Closed containers shall be used for the storage of the following:**
  - (1) All production and tooling resins that contain HAPs.**
  - (2) All production and tooling gel coats that contain HAPs.**
  - (3) Waste resins and gel coats that contain HAPs.**
  - (4) Cleaning materials, including waste cleaning materials.**
  - (5) Other materials that contain HAPs.**

**The covers of the closed containers must have no visible gaps and must be in place at all times, except when equipment is placed in or removed from the container.**

**D.2.7 Operator Training for Boat Manufacturing [326 IAC 20-48-4]**

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**Pursuant to 326 IAC 20-48-4, the Permittee shall:**

- (a) Train all new and existing personnel, including contract personnel, who are involved in resin and gel coat spraying and applications that could result in excess emissions if performed improperly according to the following schedule:**
  - (i) All personnel hired shall be trained within fifteen (15) days of hiring.**
  - (ii) To ensure training goals listed in subsection (b) are maintained, all personnel shall be given refresher training annually.**
  - (iii) Personnel who have been trained by another owner or operator subject to this rule are exempt from subdivision (1) if written documentation that the employee's training is current is provided to the new employer.**
- (b) The lesson plans shall cover, for the initial and refresher training, at a minimum, all of the following topics:**
  - (i) Appropriate application techniques.**
  - (ii) Appropriate equipment cleaning procedures.**
  - (iii) Appropriate equipment setup and adjustment to minimize material usage and overspray.**

**D.2.8 Preventive Maintenance Plan [326 IAC 2-7-4(c)(9)]**

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**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.2.9 Testing Requirements [326 IAC 20-48]**

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**Compliance with the HAP monomer content limitation in Condition D.2.5 shall be determined using one (1) of the following:**

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

#### **D.2.10 VOC Emissions [326 IAC 8-1-4][326 IAC 8-1-2(a)]**

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**Compliance with the VOC content and usage limitations contained in Condition D.2.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA-approved form, emission factors shall be taken from the following reference approved by IDEM, OAQ: "Unified Emission Factors for Open Molding of Composites" July 23, 2001, or its updates. The VOC emissions from the paint spray booths, lamination and foam filling areas, and assembly, subassembly and upholstery areas shall be calculated by multiplying the usage of each material by the VOC content as shown on the MSDS. The VOC emissions for dilution solvents and cleanup solvents shall be calculated by multiplying the usage of each solvent by the VOC content as shown on the MSDS. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.**

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

#### **D.2.11 Monitoring**

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- (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 vents 43 through 54 while one or more of the booths STB13 through STB24 that exhaust to these vents are in operation, and vent 42 while GSB3 is in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C – Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C – Response to Excursions or Exceedances, shall be considered a deviation from this permit.**
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. When there**

is a noticeable change in overspray emissions, or evidence of overspray emissions is observed, the Permittee shall take reasonable response steps in accordance with Section C – Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C – Response to excursions or Exceedances, shall be considered a deviation from this permit.

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

##### **D.2.12 Record Keeping Requirements**

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- (a) To document compliance with Condition D.2.3, 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.2.3.
- (1) The usage by weight and VOC 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.2.11, the Permittee shall maintain a log of daily overspray observations, and daily and weekly inspections.
- (c) To document compliance with Condition D.2.7, the Permittee shall maintain the following training records on site and available for inspection and review:
- (1) A copy of the current training program.
  - (2) A list of all current personnel, by name, that are required to be trained and the dates they were trained and the date of the most recent refresher training.
  - (3) Records of prior training programs and former personnel are not required to be maintained.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

##### **D.2.13 Reporting Requirements**

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A quarterly summary of the information to document compliance with Conditions D.2.3 and D.2.12 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.

*Change No. 30.*

Section E is added as follows for the requirements under the boat manufacturing NESHAP (40 CFR 63, Subpart VVVV). The source has chosen to comply with the maximum achievable control technology (MACT) model point value averaging (emissions averaging) option under 40 CFR 63.5701(a)(1). The following provisions of 40 CFR Part 63, Subpart VVVV shall be applicable to Thunderbird Products, Inc.:

## SECTION E FACILITY OPERATION CONDITIONS

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

- (1) Three (3) gel coating booths, identified as GSB4, GSB5, and GSB6, constructed in 1988, with a maximum capacity of 0.13 boats per hour per booth, using dry filters as PM 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, constructed in 1988, with a maximum capacity of 0.005 boats per hour per booth, using dry filters as PM 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, constructed in 1988, and SB9, constructed in 2005, with a maximum capacity of 0.078 boats per hour per booth, using dry filters as PM 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 AV2 through AV7 constructed in 1988, with AV8 constructed in 2000, and AV9 constructed in 2002, with a maximum capacity of 0.13 boats per hour per area, using dry filters as PM control, and exhausting to stacks/vents, #3, #4, #5, #6, #7, #8, #9 and #38.
- (5) Eight (8) stationary booths for gel coating/resin applications, identified as STB5 through STB12, with STB7 through STB11 constructed in 2000, and STB5, STB6 and STB12 constructed in 2002, with a maximum capacity of 0.025 boat units per hour per booth, each using dry filters as PM control, exhausting to stacks/vents #27, #28, #29, #30, #31, #32, #36, and #37, respectively.
- (6) Three (3) paint spray booths, identified as SB6, SB7, and SB8, constructed in 2000, with a maximum capacity of 0.025 boat units per hour per booth, each using dry filters as PM control, and each exhausting to stacks/vents #33, #34, and #35, respectively.
- (7) One (1) assembly, subassembly, upholstery area, constructed in 2000, with a maximum capacity of processing 0.25 boat units per hour, and exhausting to the atmosphere.
- (8) Eight (8) gel coating/resin booths, identified as STB13 (exhausting to vent 043), STB14 (exhausting to vent 044), STB15 (exhausting to vent 045), STB16 (exhausting to vent 046), STB17 (exhausting to vent 047), STB18 (exhausting to vent 048), STB20 (exhausting to vent 050), and STB21 (exhausting to vent 051), constructed in 2006, with a maximum capacity of 0.0057 boat per hour per booth, using dry filters as PM control.
- (9) Two (2) gel coating/resin booths, identified as STB19 (exhausting to vent 049) and STB24 (exhausting to vent 054), constructed in 2006, with a maximum capacity of 0.02 boat per hour per booth, using dry filters as PM control.
- (10) One (1) gel coating/resin booth, identified as STB22, constructed in 2006, with a maximum capacity of 0.0125 boat per hour, using dry filters as PM control, exhausting to vent 052.
- (11) One (1) gel coating/resin booth, identified as STB23, constructed in 2006, with a maximum capacity of 0.0167 boat per hour, using dry filters as PM control, exhausting to vent 053.
- (12) One (1) gel coating booth, identified as GSB3, constructed in 2006, with a maximum capacity of ten (10) boat molds per year, using dry filters as PM control, exhausting to vent 042.

### Insignificant Activities

Other activities or categories not previously identified with emissions below insignificant thresholds:

- (1) Mold making and repair activities using tooling resins and gelcoats.
- (2) Use of organic peroxide catalysts in resin and gelcoat application areas.

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

### National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements [326 IAC 2-7-5(1)]

#### E.1 General Provisions Relating to HAPs [326 IAC 20-1-1][40 CFR 63, Subpart A]

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

#### E.2 Boat Manufacturing Operations NESHAP [326 IAC 20-48] [40 CFR Part 63, Subpart VVVV]

The Permittee that engages in boat manufacturing operations shall comply with the provisions of 40 CFR Part 63, Subpart VVVV, which are incorporated by reference as 326 IAC 20-48, as follows:

##### Sec. 63.5689 What parts of my facility are covered by this subpart?

The affected source (the portion of your boat manufacturing facility covered by this subpart) is the combination of all of the boat manufacturing operations listed in paragraphs (a) through (f) of this section.

- (a) Open molding resin and gel coat operations (including pigmented gel coat, clear gel coat, production resin, tooling gel coat, and tooling resin).
- (b) Closed molding resin operations.
- (c) Resin and gel coat mixing operations.
- (d) Resin and gel coat application equipment cleaning operations.
- (e) Carpet and fabric adhesive operations.
- (f) \*\*\*

##### § 63.5695 When must I comply with this subpart?

You must comply with the standards in this subpart by the compliance dates specified in Table 1 to this subpart.

##### Standards for Open Molding Resin and Gel Coat Operations

##### § 63.5698 Emission limit for open molding resin and gel coat operations

- (a) You must limit organic HAP emissions from the five open molding operations listed in paragraphs (a)(1) through (5) of this section to the emission limit specified in paragraph (b) of this section. Operations listed in paragraph (d) are exempt from this limit.
- (1) Production resin.
  - (2) Pigmented gel coat.
  - (3) Clear gel coat.
  - (4) Tooling resin.
  - (5) Tooling gel coat.

- (b) You must limit organic HAP emissions from open molding operations to the limit specified by equation 1 of this section, based on a 12-month rolling average.

$$\text{HAP Limit} = [46(M_R) + 159(M_{PG}) + 291(M_{CG}) + 54(M_{TR}) + 214(M_{TG})] \quad \text{(Eq. 1)}$$

Where:

HAP Limit = total allowable organic HAP that can be emitted from the open molding operations, kilograms.

MR = mass of production resin used in the past 12 months, excluding any materials exempt under paragraph (d) of this section, megagrams.

MPG = mass of pigmented gel coat used in the past 12 months, excluding any materials exempt under paragraph (d) of this section, megagrams.

MCG = mass of clear gel coat used in the past 12 months, excluding any materials exempt under paragraph (d) of this section, megagrams.

MTR = mass of tooling resin used in the past 12 months, excluding any materials exempt under paragraph (d) of this section, megagrams.

MTG = mass of tooling gel coat used in the past 12 months, excluding any materials exempt under paragraph (d) of this section, megagrams.

- (c) The open molding emission limit is the same for both new and existing sources.
- (d) The materials specified in paragraphs (d)(1) through (3) of this section are exempt from the open molding emission limit specified in paragraph (b) of this section.
- (1) Production resins (including skin coat resins) that must meet specifications for use in military vessels or must be approved by the U.S. Coast Guard for use in the construction of lifeboats, rescue boats, and other lifesaving appliances approved under 46 CFR subchapter Q or the construction of small passenger vessels regulated by 46 CFR subchapter T. Production resins for which this exemption is used must be applied with nonatomizing (non-spray) resin application equipment. You must keep a record of the resins for which you are using this exemption.
  - (2) Pigmented, clear, and tooling gel coat used for part or mold repair and touch up. The total gel coat materials included in this exemption must not exceed 1 percent by weight of all gel coat used at the facility on a 12-month rolling-average basis. You must keep a record of the amount of gel coats used per month for which you are using this exemption and copies of calculations showing that the exempt amount does not exceed 1 percent of all gel coat used.
  - (3) Pure, 100 percent vinylester resin used for skin coats. This exemption does not apply to blends of vinylester and polyester resins used for skin coats.  
The total resin materials included in the exemption cannot exceed 5 percent by weight of all resin used at the facility on a 12-month rolling-average basis.  
You must keep a record of the amount of 100 percent vinylester skin coat

resin used per month that is eligible for this exemption and copies of calculations showing that the exempt amount does not exceed 5 percent of all resin used.

**§ 63.5701 Options for complying with the open molding emission limit**

You must meet the emission limit in § 63.5698 for the resins and gel coats used in open molding operations at the facility.

- (a) **Maximum achievable control technology (MACT) model point value averaging (emissions averaging) option.**
- (1) Demonstrate that emissions from the open molding resin and gel coat operations that you average meet the emission limit in § 63.5698 using the procedures described in § 63.5710. Compliance with this option is based on a 12-month rolling average.
  - (2) \*\*\*\*\*
- (b) – (c)\*\*\*\*\*

**§ 63.5704 General requirements for complying with the open molding emission limit**

- (a) **Emissions averaging option.** For those open molding operations and materials complying using the emissions averaging option, you must demonstrate compliance by performing the steps in paragraphs (a)(1) through (5) of this section.
- (1) Use the methods specified in § 63.5758 to determine the organic HAP content of resins and gel coats.
  - (2) Complete the calculations described in § 63.5710 to show that the organic HAP emissions do not exceed the limit specified in § 63.5698.
  - (3) Keep records as specified in paragraphs (a)(3)(i) through (iv) of this section for each resin and gel coat.
    - (i) Hazardous air pollutant content.
    - (ii) Amount of material used per month.
    - (iii) Application method used for production resin and tooling resin. This record is not required if all production resins and tooling resins are applied with nonatomized technology.
    - (iv) Calculations performed to demonstrate compliance based on MACT model point values, as described in § 63.5710.
  - (4) Prepare and submit the implementation plan described in § 63.5707 to the Administrator and keep it up to date.
  - (5) Submit semiannual compliance reports to the Administrator as specified in § 63.5764.

**§ 63.5707 Implementation plan for open molding operations and when to prepare one**

- (a) You must prepare an implementation plan for all open molding operations for which to comply by using the emissions averaging option described in § 63.5704(a).
- (b) The implementation plan must describe the steps you will take to bring the open molding operations covered by this subpart into compliance. For each operation included in the emissions average, the implementation plan must include the elements listed in paragraphs (b)(1) through (3) of this section.

- (1) A description of each operation included in the average.
  - (2) The maximum organic HAP content of the materials used, the application method used (if any atomized resin application methods are used in the average), and any other methods used to control emissions.
  - (3) Calculations showing that the operations covered by the plan will comply with the open molding emission limit specified in § 63.5698.
- (c) You must submit the implementation plan to the Administrator with the notification of compliance status specified in § 63.5761.
- (d) You must keep the implementation plan on site and provide it to the Administrator when asked.
- (e) If you revise the implementation plan, you must submit the revised plan with the next semiannual compliance report specified in § 63.5764.

**§ 63.5710 Demonstration of compliance using emissions averaging**

- (a) Compliance using the emissions averaging option is demonstrated on a 12-month rolling-average basis and is determined at the end of every month (12 times per year). The first 12-month rolling-average period begins on the compliance date specified in § 63.5695.
- (b) At the end of the twelfth month after the compliance date and at the end of every subsequent month, use equation 1 of this section to demonstrate that the organic HAP emissions from those operations included in the average do not exceed the emission limit in § 63.5698 calculated for the same 12-month period. (Include terms in equation 1 of § 63.5698 and equation 1 of this section for only those operations and materials included in the average.)

$$\text{HAP emissions} = [(PV_R)(M_R) + (PV_{PG})(M_{PG}) + (PV_{CG})(M_{CG}) + (PV_{TR})(M_{TR}) + (PV_{TG})(M_{TG})]$$

(Eq 1)

Where:

HAP emissions = Organic HAP emissions calculated using MACT model point values for each operation included in the average, kilograms.

$PV_R$  = Weighted-average MACT model point value for production resin used in the past 12 months, kilograms per megagram.

$M_R$  = Mass of production resin used in the past 12 months, megagrams.

$PV_{PG}$  = Weighted-average MACT model point value for pigmented gel coat used in the past 12 months, kilograms per megagram.

$M_{PG}$  = Mass of pigmented gel coat used in the past 12 months, megagrams.

$PV_{CG}$  = Weighted-average MACT model point value for clear gel coat used in the past 12 months, kilograms per megagram.

$M_{CG}$  = Mass of clear gel coat used in the past 12 months, megagrams.

$PV_{TR}$  = Weighted-average MACT model point value for tooling resin used in the past 12 months, kilograms per megagram.

$M_{TR}$  = Mass of tooling resin used in the past 12 months, megagrams.

$PV_{TG}$  = Weighted-average MACT model point value for tooling gel coat used in the past 12 months, kilograms per megagram.

$M_{TG}$  = Mass of tooling gel coat used in the past 12 months, megagrams.

- (c) At the end of every month, use equation 2 of this section to compute the weighted-average MACT model point value for each open molding resin and gel coat operation included in the average.

$$PV_{OP} = \frac{\sum_{i=1}^n (M_i PV_i)}{\sum_{i=1}^n (M_i)} \quad (\text{Eq.2})$$

**Where:**

**PV<sub>OP</sub>** = weighted-average MACT model point value for each open molding operation (**PV<sub>R</sub>**, **PV<sub>PG</sub>**, **PV<sub>CG</sub>**, **PVPV<sub>TR</sub>**, and **PVPV<sub>TG</sub>**) included in the average, kilograms of HAP per megagram of material applied.

**M<sub>i</sub>** =mass of resin or gel coat *i* used within an operation in the past 12 months, megagrams.

**N** =number of different open molding resins and gel coats used within an operation in the past 12 months.

**PV<sub>i</sub>** =the MACT model point value for resin or gel coat *i* used within an operation in the past 12 months, kilograms of HAP per megagram of material applied.

- (d) You must use the equations in Table 3 to this subpart to calculate the MACT model point value (PV<sub>i</sub>) for each resin and gel coat used in each operation in the past 12 months.
- (e) If the organic HAP emissions, as calculated in paragraph (b) of this section, are less than the organic HAP limit calculated in § 63.5698(b) for the same 12-month period, then you are in compliance with the emission limit in § 63.5698 for those operations and materials included in the average.

#### § 63.5731 Standards for resin and gel coat mixing operations

- (a) All resin and gel coat mixing containers with a capacity equal to or greater than 208 liters, including those used for on-site mixing of putties and polyputties, must have a cover with no visible gaps in place at all times.
- (b) The work practice standard in paragraph (a) of this section does not apply when material is being manually added to or removed from a container, or when mixing or pumping equipment is being placed in or removed from a container.
- (c) To demonstrate compliance with the work practice standard in paragraph (a) of this section, you must visually inspect all mixing containers subject to this standard at least once per month. The inspection should ensure that all containers have covers with no visible gaps between the cover and the container, or between the cover and equipment passing through the cover.
- (d) You must keep records of which mixing containers are subject to this standard and the results of the inspections, including a description of any repairs or corrective actions taken.

#### § 63.5734 Standards for resin and gel coat application equipment cleaning operations

- (a) For routine flushing of resin and gel coat application equipment (e.g., spray guns, flowcoaters, brushes, rollers, and squeegees), you must use a cleaning solvent that contains no more than 5 percent organic HAP by weight. For removing cured resin or gel coat from application equipment, no organic HAP content limit applies.
- (b) You must store organic HAP-containing solvents used for removing cured resin or gel coat in containers with covers. The covers must have no visible gaps and must be in place at all times, except when equipment to be

cleaned is placed in or removed from the container. On containers with a capacity greater than 7.6 liters, the distance from the top of the container to the solvent surface must be no less than 0.75 times the diameter of the container. Containers that store organic HAP-containing solvents used for removing cured resin or gel coat are exempt from the requirements of 40 CFR part 63, subpart T. Cured resin or gel coat means resin or gel coat that has changed from a liquid to a solid.

**§ 63.5737 Demonstration of compliance with the resin and gel coat application equipment cleaning standards**

- (a) Determine and record the organic HAP content of the cleaning solvents subject to the standards specified in § 63.5734 using the methods specified in § 63.5758.
- (b) If you recycle cleaning solvents on site, you may use documentation from the solvent manufacturer or supplier or a measurement of the organic HAP content of the cleaning solvent as originally obtained from the solvent supplier for demonstrating compliance, subject to the conditions in § 63.5758 for demonstrating compliance with organic HAP content limits.
- (c) At least once per month, you must visually inspect any containers holding organic HAP-containing solvents used for removing cured resin and gel coat to ensure that the containers have covers with no visible gaps. Keep records of the monthly inspections and any repairs made to the covers.

**§ 63.5758 Determination of the organic HAP content of materials**

- (a) *Determine the organic HAP content for each material used.* To determine the organic HAP content for each material used in the open molding resin and gel coat operations, carpet and fabric adhesive operations, or aluminum recreational boat surface coating operations, you must use one of the options in paragraphs (a)(1) through (6) of this section.
  - (1) *Method 311 (appendix A to 40 CFR part 63).* You may use Method 311 for determining the mass fraction of organic HAP. Use the procedures specified in paragraphs (a)(1)(i) and (ii) of this section when determining organic HAP content by Method 311.
    - (i) Include in the organic HAP total each organic HAP that is measured to be present at 0.1 percent by mass or more for Occupational Safety and Health Administration (OSHA)-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and at 1.0 percent by mass or more for other compounds. For example, if toluene (not an OSHA carcinogen) is measured to be 0.5 percent of the material by mass, you do not need to include it in the organic HAP total. Express the mass fraction of each organic HAP you measure as a value truncated to four places after the decimal point (for example, 0.1234).
    - (ii) Calculate the total organic HAP content in the test material by adding up the individual organic HAP contents and truncating the result to three places after the decimal point (for example, 0.123).
  - (2) *Method 24 (appendix A to 40 CFR part 60).* You may use Method 24 to determine the mass fraction of nonaqueous volatile matter of aluminum coatings and use that value as a substitute for mass fraction of organic

- HAP.**
- (3) **ASTM D1259–85 (Standard Test Method for Nonvolatile Content of Resins).** You may use ASTM D1259–85 (available for purchase from ASTM) to measure the mass fraction of volatile matter of resins and gel coats for open molding operations and use that value as a substitute for mass fraction of organic HAP.
- (4) **Alternative method.** You may use an alternative test method for determining mass fraction of organic HAP if you obtain prior approval by the Administrator. You must follow the procedure in § 63.7(f) to submit an alternative test method for approval.
- (5) **Information from the supplier or manufacturer of the material.** You may rely on information other than that generated by the test methods specified in paragraphs (a)(1) through (4) of this section, such as manufacturer’s formulation data, according to paragraphs (a)(5)(i) through (iii) of this section.
- (i) Include in the organic HAP total each organic HAP that is present at 0.1 percent by mass or more for OSHA defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and at 1.0 percent by mass or more for other compounds. For example, if toluene (not an OSHA carcinogen) is 0.5 percent of the material by mass, you do not have to include it in the organic HAP total.
- (ii) If the organic HAP content is provided by the material supplier or manufacturer as a range, then you must use the upper limit of the range for determining compliance. If a separate measurement of the total organic HAP content using the methods specified in paragraphs (a)(1) through (4) of this section exceeds the upper limit of the range of the total organic HAP content provided by the material supplier or manufacturer, then you must use the measured organic HAP content to determine compliance.
- (iii) If the organic HAP content is provided as a single value, you may assume the value is a manufacturing target value and actual organic HAP content may vary from the target value. If a separate measurement of the total organic HAP content using the methods specified in paragraphs (a)(1) through (4) of this section is less than 2 percentage points higher than the value for total organic HAP content provided by the material supplier or manufacturer, then you may use the provided value to demonstrate compliance. If the measured total organic HAP content exceeds the provided value by 2 percentage points or more, then you must use the measured organic HAP content to determine compliance.
- (6) **Solvent blends.** Solvent blends may be listed as single components for some regulated materials in certifications provided by manufacturers or suppliers. Solvent blends may contain organic HAP which must be counted toward the total organic HAP content of the materials. When detailed organic HAP content data for solvent blends are not available, you may use the values for organic HAP content that are listed in Table 5 or 6 to this subpart. You may use Table 6 to this subpart only if the solvent blends in the materials you use do not match any of the solvent blends in Table 5 to this subpart and you know only whether the blend is either aliphatic or aromatic. However, if test results indicate higher values than those listed in Table 5 or 6 to this subpart, then the test results must be used for determining compliance.

- (a) You must submit all of the notifications in Table 7 to this subpart that apply to you by the dates in the table. The notifications are described more fully in 40 CFR part 63, subpart A, General Provisions, referenced in Table 8 to this subpart.
- (b) If you change any information submitted in any notification, you must submit the changes in writing to the Administrator within 15 calendar days after the change.

**§ 63.5764 Reports to submit**

- (a) You must submit the applicable reports specified in paragraphs (b) through (e) of this section. To the extent possible, you must organize each report according to the operations covered by this subpart and the compliance procedure followed for that operation.
- (b) Unless the Administrator has approved a different schedule for submission of reports under § 63.10(a), you must submit each report by the dates in paragraphs (b)(1) through (5) of this section.
  - (1) If your source is not controlled by an add-on control device (i.e., you are complying with organic HAP content limits, application equipment requirements, or MACT model point value averaging provisions), the first compliance report must cover the period beginning 12 months after the compliance date specified for the source in § 63.5695 and ending on June 30 or December 31, whichever date is the first date following the end of the first 12-month period after the compliance date that is specified for the source in § 63.5695.
  - (2) The first compliance report must be postmarked or delivered no later than 60 calendar days after the end of the compliance reporting period specified in paragraph (b)(1) of this section.
  - (3) Each subsequent compliance report must cover the applicable semiannual reporting period from January 1 through June 30 or from July 1 through December 31.
  - (4) Each subsequent compliance report must be postmarked or delivered no later than 60 calendar days after the end of the semiannual reporting period.
  - (5) For each affected source that is subject to permitting regulations pursuant to 40 CFR part 70 or 71, and if the permitting authority has established dates for submitting semiannual reports pursuant to 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), you may submit the first and subsequent compliance reports according to the dates the permitting authority has established instead of according to the dates in paragraphs (b)(1) through (4) of this section.
- (c) The compliance report must include the information specified in paragraphs (c)(1) through (7) of this section.
  - (1) Company name and address.
  - (2) A statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the report.
  - (3) The date of the report and the beginning and ending dates of the reporting period.
  - (4) A description of any changes in the manufacturing process since the last compliance report.
  - (5) A statement or table showing, for each regulated operation, the applicable organic HAP content limit, application equipment requirement, or MACT model point value averaging provision with which you are complying. The statement or table must also show the actual weighted-average organic

- HAP content or weighted-average MACT model point value (if applicable) for each operation during each of the rolling 12-month averaging periods that end during the reporting period.**
- (6) If you were in compliance with the emission limits and work practice standards during the reporting period, you must include a statement to that effect.**
  - (7) If you deviated from an emission limit or work practice standard during the reporting period, you must also include the information listed in paragraphs (c)(7)(i) through (iv) of this section in the semiannual compliance report.**
    - (i) A description of the operation involved in the deviation.**
    - (ii) The quantity, organic HAP content, and application method (if relevant) of the materials involved in the deviation.**
    - (iii) A description of any corrective action you took to minimize the deviation and actions you have taken to prevent it from happening again.**
    - (iv) A statement of whether or not the facility was in compliance for the 12-month averaging period that ended at the end of the reporting period.**

**§ 63.5767 Record keeping**

**The Permittee must keep the records specified in paragraphs (a) through (d) of this section in addition to records specified in individual sections of this subpart.**

- (a) The Permittee must keep a copy of each notification and report that you submitted to comply with this subpart.**
- (b) The Permittee must keep all documentation supporting any notification or report that are submitted.**
- (c) If your facility is not controlled by an add-on control device (i.e., you are complying with organic HAP content limits, application equipment requirements, or MACT model point value averaging provisions), the Permittee must keep the records specified in paragraphs (c)(1) through (3) of this section.**
  - (1) The total amounts of open molding production resin, pigmented gel coat, clear gel coat, tooling resin, and tooling gel coat used per month and the weighted-average organic HAP contents for each operation, expressed as weightpercent. For open molding production resin and tooling resin, you must also record the amounts of each applied by atomized and nonatomized methods.**
  - (2) \*\*\*\***
  - (3) \*\*\*\***

**§ 63.5770 The form and length of time records must be kept**

- (a) Records must be readily available and in a form so they can be easily inspected and reviewed.**
- (b) Each record must be kept for 5 years following the date that it is generated.**
- (c) Each record must be kept on site for at least 2 years after the date that it is generated. Records can be kept offsite for the remaining 3 years.**
- (d) Records can be kept on paper or an alternative media, such as microfilm,**

**computer, computer disks, magnetic tapes, or on microfiche.**

**§ 63.5773 What parts of the General Provisions apply to me?**

**You must comply with the requirements of the General Provisions in 40 CFR part 63, subpart A, as specified in Table 8 to this subpart.**

**§ 63.5776 Who implements and enforces this subpart?**

- (a) **If the Administrator has delegated authority to your State or local agency, the State or local agency has the authority to implement and enforce this subpart.**
- (b) **In delegating implementation and enforcement authority of this subpart to a State or local agency under 40 CFR part 63, subpart E, the authorities that are retained by the Administrator of the U.S. EPA and are not transferred to the State or local agency are listed in paragraphs (b)(1) through (4) of this section.**

- (1) **Under Sec. 63.6(g), the authority to approve alternatives to the standards listed in paragraphs (b)(1)(i) through (vii) of this section is not delegated.**
- (i) **Sec. 63.5698--Emission limit for open molding resin and gel coat operations.**
  - (ii) **Sec. 63.5728--Standards for closed molding resin operations.**
  - (iii) **Sec. 63.5731(a)--Standards for resin and gel coat mixing operations.**
  - (iv) **Sec. 63.5734--Standards for resin and gel coat application equipment cleaning operations.**
  - (v) **Sec. 63.5740(a)--Emission limit for carpet and fabric adhesive operations.**
  - (vi) **Sec. 63.5743--Standards for aluminum recreational boat surface coating operations.**
  - (vii) **Sec. 63.5746(g)--Approval of alternative means of demonstrating compliance with the emission limits for aluminum recreational boat surface coating operations.**
- (2) **Under Sec. 63.7(e)(2)(ii) and (f), the authority to approve alternatives to the test methods listed in paragraphs (b)(2)(i) through (iv) of this section is not delegated.**
- (i) **Sec. 63.5719(b)--Method for determining whether an enclosure is a total enclosure.**
  - (ii) **Sec. 63.5719(c)--Methods for measuring emissions from a control device.**
  - (iii) **Sec. 63.5725(d)(1)--Performance specifications for thermal oxidizer combustion temperature monitors.**
  - (iv) **Sec. 63.5758--Method for determining hazardous air pollutant content of regulated materials.**
- (3) **Under Sec. 63.8(f), the authority to approve major alternatives to the monitoring requirements listed in Sec. 63.5725 is not delegated. A "major alternative" is defined in Sec. 63.90.**
- (4) **Under Sec. 63.10(f), the authority to approve major alternatives to the reporting and recordkeeping requirements listed in Secs. 63.5764, 63.5767, and 63.5770 is not delegated. A "major alternative" is defined in Sec. 63.90.**

**§ 63.5779 What definitions apply to this subpart?**

**Terms used in this subpart are defined in the Clean Air Act, in Sec. 63.2, and in this section as follows:**

**Add-on control means an air pollution control device, such as a thermal oxidizer, that reduces pollution in an air stream by destruction or removal before discharge to the atmosphere.**

**Administrator means the Administrator of the United States Environmental Protection Agency (U.S. EPA) or an authorized representative (for example, a State delegated the authority to carry out the provisions of this subpart).**

**Aluminum recreational boat means any marine or freshwater recreational boat that has a hull or deck constructed primarily of aluminum. A recreational boat is a vessel which by design and construction is intended by the manufacturer to be operated primarily for pleasure, or to be leased, rented or chartered to another for the latter's pleasure (rather than for commercial or military purposes); and whose major structural components are fabricated and assembled in an indoor, production-line manufacturing plant or similar land-side operation and not in a dry dock, graving dock, or marine railway on the navigable waters of the United States.**

**Aluminum recreational boat surface coating operation means the application of primers or top coats to aluminum recreational boats. It also includes the application of clear coats over top coats. Aluminum recreational boat surface coating operations do not include the application of wood coatings or antifoulant coatings to aluminum recreational boats.**

**Aluminum coating spray gun cleaning means the process of flushing or removing paints or coatings from the interior or exterior of a spray gun used to apply aluminum primers, clear coats, or top coats to aluminum recreational boats.**

**Aluminum wipedown solvents means solvents used to remove oil, grease, welding smoke, or other contaminants from the aluminum surfaces of a boat before priming or painting. Aluminum wipedown solvents contain no coating solids; aluminum surface preparation materials that contain coating solids are considered coatings for the purpose of this subpart and are not wipedown solvents.**

**Antifoulant coating means any coating that is applied to the underwater portion of a boat specifically to prevent or reduce the attachment of biological organisms and that is registered with EPA as a pesticide under the Federal Insecticide, Fungicide, and Rodenticide Act (7 U.S.C. section 136, et seq.). For the purpose of this subpart, primers used with antifoulant coatings to prepare the surface to accept the antifoulant coating are considered antifoulant coatings.**

**Assembly adhesive means any chemical material used in the joining of one fiberglass, metal, foam, or wood parts to another to form a temporary or permanently bonded assembly. Assembly adhesives include, but are not limited to, methacrylate adhesives and putties made from polyester or vinyl ester resin mixed with inert fillers or fibers.**

**Atomized resin application means a resin application technology in which the resin leaves the application equipment and breaks into droplets or an aerosol as it travels from the application equipment to the surface of the part. Atomized resin application includes, but is not limited to, resin spray guns and resin chopper spray guns.**

**Boat means any type of vessel, other than a seaplane, that can be used for transportation on the water.**

**Boat manufacturing facility means a facility that manufactures the hulls or decks of boats**

**from fiberglass or aluminum or assembles boats from premanufactured hulls and decks, or builds molds to make fiberglass hulls or decks. A facility that manufactures only parts of boats (such as hatches, seats, or lockers) or boat trailers, but no boat hulls or decks or molds for fiberglass boat hulls or decks, is not considered a boat manufacturing facility for the purpose of this subpart.**

**Carpet and fabric adhesive means any chemical material that permanently attaches carpet, fabric, or upholstery to any surface of a boat.**

**Clear gel coat means gel coats that are clear or translucent so that underlying colors are visible. Clear gel coats are used to manufacture parts for sale. Clear gel coats do not include tooling gel coats used to build or repair molds.**

**Closed molding means any molding process in which pressure is used to distribute the resin through the reinforcing fabric placed between two mold surfaces to either saturate the fabric or fill the mold cavity. The pressure may be clamping pressure, fluid pressure, atmospheric pressure, or vacuum pressure used either alone or in combination. The mold surfaces may be rigid or flexible. Closed molding includes, but is not limited to, compression molding with sheet molding compound, infusion molding, resin injection molding (RIM), vacuum-assisted resin transfer molding (VARTM), resin transfer molding (RTM), and vacuum-assisted compression molding. Processes in which a closed mold is used only to compact saturated fabric or remove air or excess resin from the fabric (such as in vacuum bagging), are not considered closed molding. Open molding steps, such as application of a gel coat or skin coat layer by conventional open molding prior to a closed molding process, are not closed molding.**

**Cured resin and gel coat means resin or gel coat that has been polymerized and changed from a liquid to a solid.**

**Deviation means any instance in which an affected source subject to this subpart or an owner or operator of such a source:**

- (1) Fails to meet any requirement or obligation established by this subpart, including, but not limited to, any emission limit, operating limit, or work practice requirement;**
- (2) Fails to meet any term or condition which is adopted to implement an applicable requirement in this subpart and which is included in the operating permit for any affected source required to obtain such permit; or**
- (3) Fails to meet any emission limit, operating limit, or work practice requirement in this subpart during any startup, shutdown, or malfunction, regardless of whether or not such failure is permitted by this subpart.**

**Enclosure means a structure, such as a spray booth, that surrounds a source of emissions and captures and directs the emissions to an add-on control device.**

**Fiberglass boat means a vessel in which either the hull or deck is built from a composite material consisting of a thermosetting resin matrix reinforced with fibers of glass, carbon, aramid, or other material.**

**Fiberglass hull and deck coatings means coatings applied to the exterior or interior surface of fiberglass boat hulls and decks on the completed boat. Polyester and vinylester resins and gel coats used in building fiberglass parts are not fiberglass hull and deck coatings for the purpose of this subpart.**

**Filled resin means a resin to which an inert material has been added to change viscosity, density, shrinkage, or other physical properties.**

**Gel coat means a thermosetting resin surface coating containing styrene (Chemical Abstract Service or CAS No. 100-42-5) or methyl methacrylate (CAS No. 80-62-6), either pigmented or clear, that provides a cosmetic enhancement or improves resistance to degradation from exposure to the elements. Gel coat layers do not contain any reinforcing fibers and gel coats are applied directly to mold surfaces or to a finished laminate.**

**Hazardous air pollutant or HAP means any air pollutant listed in, or pursuant to section 112(b) of the Clean Air Act.**

**Hazardous air pollutant content or HAP content means the amount of HAP contained in a regulated material at the time it is applied to the part being manufactured. If no HAP is added to a material as a thinner or diluent, then the HAP content is the same as the HAP content of the material as purchased from the supplier. For resin and gel coat, HAP content does not include any HAP contained in the catalyst added to the resin or gel coat during application to initiate curing.**

**Hazardous air pollutant data sheet (HDS) means documentation furnished by a material supplier or an outside laboratory to provide the organic HAP content of the material by weight, measured using an EPA Method, manufacturer's formulation data, or an equivalent method. For aluminum coatings, the HDS also documents the solids content by volume, determined from the manufacturer's formulation data. The purpose of the HDS is to help the affected source in showing compliance with the organic HAP content limits contained in this subpart. The HDS must state the maximum total organic HAP concentration, by weight, of the material. It must include any organic HAP concentrations equal to or greater than 0.1 percent by weight for individual organic HAP that are carcinogens, as defined by the Occupational Safety and Health Administration Hazard Communication Standard (29 CFR part 1910), and 1.0 percent by weight for all other individual organic HAP, as formulated. The HDS must also include test conditions if EPA Method 311 is used for determining organic HAP content. Maximum achievable control technology (MACT) model point value means a number calculated for open molding operations that is a surrogate for emissions and is used to determine if your open molding operations are in compliance with the provisions of this subpart. The units for MACT model point values are kilograms of organic HAP per megagram of resin or gel coat applied.**

**Manufacturer's certification means documentation furnished by a material supplier that shows the organic HAP content of a material and includes a HDS.**

**Mold means the cavity or surface into or on which gel coat, resin, and fibers are placed and from which finished fiberglass parts take their form.**

**Mold sealing and release agents means materials applied to a mold to seal, polish, and lubricate the mold to prevent parts from sticking to the mold. Mold sealers, waxes, and glazing and buffing compounds are considered mold sealing and release agents for the purposes of this subpart.**

**Mold stripping and cleaning solvents means materials used to remove mold sealing and release agents from a mold before the mold surface is repaired, polished, or lubricated during normal mold maintenance.**

**Month means a calendar month.**

**Neat resin means a resin to which no filler has been added.**

**Nonatomized resin application means any application technology in which the resin is not broken into droplets or an aerosol as it travels from the application equipment to the surface of the part. Nonatomized resin application technology includes, but is not limited to, flowcoaters, chopper flowcoaters, pressure fed resin rollers, resin impregnators, and**

**hand application (for example, paint brush or paint roller).**

**Open molding resin and gel coat operation means any process in which the reinforcing fibers and resin are placed in the mold and are open to the surrounding air while the reinforcing fibers are saturated with resin. For the purposes of this subpart, open molding includes operations in which a vacuum bag or similar cover is used to compress an uncured laminate to remove air bubbles or excess resin, or to achieve a bond between a core material and a laminate.**

**Pigmented gel coat means opaque gel coats used to manufacture parts for sale. Pigmented gel coats do not include tooling gel coats used to build or repair molds.**

**Production resin means any resin used to manufacture parts for sale. Production resins do not include tooling resins used to build or repair molds, or assembly adhesives as defined in this section.**

**Recycled resin and gel coat application equipment cleaning solvent means cleaning solvents recycled on-site or returned to the supplier or another party to remove resin or gel coat residues so that the solvent can be reused.**

**Research and development activities means:**

- (1) Activities conducted at a laboratory to analyze air, soil, water, waste, or product samples for contaminants, environmental impact, or quality control;**
- (2) Activities conducted to test more efficient production processes or methods for preventing or reducing adverse environmental impacts, provided that the activities do not include the production of an intermediate or final product for sale or exchange for commercial profit, except in a de minimis manner; and**
- (3) Activities conducted at a research or laboratory facility that is operated under the close supervision of technically trained personnel, the primary purpose of which is to conduct research and development into new processes and products and that is not engaged in the manufacture of products for sale or exchange for commercial profit, except in a de minimis manner.**

**Resin means any thermosetting resin with or without pigment containing styrene (CAS No. 100-42-5) or methyl methacrylate (CAS No. 80-62-6) and used to encapsulate and bind together reinforcement fibers in the construction of fiberglass parts.**

**Resin and gel coat application equipment cleaning means the process of flushing or removing resins and gel coats from the interior or exterior of equipment that is used to apply resin or gel coat in the manufacture of fiberglass parts.**

**Resin and gel coat mixing operation means any operation in which resin or gel coat, including the mixing of putties or polyputties, is combined with additives that include, but are not limited to, fillers, promoters, or catalysts.**

**Roll-out means the process of using rollers, squeegees, or similar tools to compact reinforcing materials saturated with resin to remove trapped air or excess resin.**

**Skin coat is a layer of resin and fibers applied over the gel coat to protect the gel coat from being deformed by the next laminate layers.**

**Tooling resin means the resin used to build or repair molds (also known as tools) or prototypes (also known as plugs) from which molds will be made.**

**Tooling gel coat means the gel coat used to build or repair molds (also known as tools) or prototypes (also known as plugs) from which molds will be made.**

**Vacuum bagging means any molding technique in which the reinforcing fabric is saturated with resin and then covered with a flexible sheet that is sealed to the edge of the mold and where a vacuum is applied under the sheet to compress the laminate, remove excess resin, or remove trapped air from the laminate during curing. Vacuum bagging does not include processes that meet the definition of closed molding.**

**Vinylester resin means a thermosetting resin containing esters of acrylic or methacrylic acids and having double-bond and ester linkage sites only at the ends of the resin molecules.**

**Volume fraction of coating solids means the ratio of the volume of coating solids (also known as volume of nonvolatiles) to the volume of coating; liters of coating solids per liter of coating.**

**Wood coatings means coatings applied to wooden parts and surfaces of boats, such as paneling, cabinets, railings, and trim. Wood coatings include, but are not limited to, primers, stains, sealers, varnishes, and enamels. Polyester and vinylester resins or gel coats applied to wooden parts to encapsulate them or bond them to other parts are not wood coatings.**

**Table 1 to Subpart VVVV—Compliance Dates for New and Existing Boat Manufacturing Facilities  
 As specified in § 63.5695, you must comply by the dates in the following table:**

If your facility is -	And	Then you must comply by this date -
2. An existing or new area source	Becomes a major source after August 22, 2001	<sup>1</sup> year after becoming a major source or August 22, 2002, whichever is later

<sup>1</sup>Your facility is a major source if it is a stationary source or group of stationary sources located within a contiguous area and under common control that emits or can potentially emit, considering controls, in the aggregate, 9.1 megagrams or more per year of a single hazardous air pollutant or 22.7 megagrams or more per year of a combination of hazardous air pollutants.

**Table 2 to Subpart VVVV--Alternative Organic HAP Content Requirements for Open Molding Resin and Gel Coat Operations**

**As specified in Secs. 63.5701(b), 63.5704(b)(2), and 63.5713(a), (b), and (d), you must comply with the requirements in the following table:**

For this operation--	And this applicaton method--	You must not exceed this weighted-average organic HAP content (weight percent) requirement--
1. Production resin operations	Atomized (spray)	28 percent
2. Production resin operations	Nonatomized (nonspray)	35 percent
3. Pigmented gel coat operations	Any method	33 percent
4. Clear gel coat operations	Any method	48 percent
5. Tooling resin operations	Atomized (spray)	30 percent
6. Tooling resin operations	Nonatomized (nonspray)	30 percent
7. Tooling gel coat operations	Any method	40 percent

**Table 3 to Subpart VVVV—MACT Model Point Value Formulas for Open Molding Operations**  
 As specified in §§ 63.5710(d) and 63.5714(a), you must calculate point values using the formulas in the following table:

For this operation—	And this application method—	Use this formula to calculate the MACT model plant value for each resin and gel coat—
1. Production resin, tooling resin.....	a. Atomized ..... b. Atomized, plus vacuum bagging with roll-out ..... c. Atomized, plus vacuum bagging without roll-out ..... d. Nonatomized ..... e. Nonatomized, plus vacuum bagging with roll-out ..... f. Nonatomized, plus vacuum bagging without rollout.	$0.014 \cdot (\text{Resin HAP}\%)^{2.425}$ $0.01185 \cdot (\text{Resin HAP}\%)^{2.425}$ $0.00945 \cdot (\text{Resin HAP}\%)^{2.425}$ $0.014 \cdot (\text{Resin HAP}\%)^{2.275}$ $0.0110 \cdot (\text{Resin HAP}\%)^{2.275}$ $0.0076 \cdot (\text{Resin HAP}\%)^{2.275}$
2. Pigmented gel coat, clear gel coat, tooling gel coat	All methods.....	$0.445 \cdot (\text{Gel coat HAP}\%)^{1.675}$

**Table 5 to Subpart VVVV—Default Organic HAP Contents of Solvents and Solvent Blends**  
 As specified in § 63.5758(a)(6), when detailed organic HAP content data for solvent blends are not available, you may use the values in the following table:

Solvent/solvent blend	CAS No.	Average organic HAP content, percent by mass	Typical organic HAP, percent by mass
1. Toluene .....	108-88-3	100	Toluene.
2. Xylene (s).....	1330-20-7	100	Xylenes, ethylbenzene
3. Hexane .....	110-54-3	50	n-hexane.
4. n-hexane.....	110-54-3	100	n-hexane.
5. Ethylbenzene .....	100-41-4	100	Ethylbenzene.
6. Aliphatic 140 .....	.....	0	None.
7. Aromatic 100 .....	.....	2	1% xylene, 1% cumene.
8. Aromatic 150 .....	.....	9	Naphthalene.
9. Aromatic naphtha .....	64742-95-6	2	1% xylene, 1% cumene.
10. Aromatic solvent .....	64742-94-5	10	Naphthalene.
11. Exempt mineral spirits.....	8032-32-4	0	None
12. Ligroines (VM & P) .	8032-32-4	0	None.
13. Lactol spirits .....	64742-89-6	15	Toluene.
14. Low aromatic white spirit .....	64742-82-1	0	None.
15. Mineral spirits .....	64742-88-7	1	Xylenes.
16. Hydrotreated naphtha .....	64742-48-9	0	None
17. Hydrotreated light distillate ....	64742-47-8	0.1	Toluene
18. Stoddard solvent .....	8052-41-3	1	Xylenes.
19. Super high-flash naphtha .....	64742-95-6	5	Xylenes.

20. Varol® solvent .....	8052-49-3	1	0.5% xylenes, 0.5% ethyl benzene. 3% toluene, 3% xylene. 4% naphthalene, 4% biphenyl.
21. VM & P naphtha .....	64742-89-8	6	
22. Petroleum distillate mixture ...	68477-31-6	8	

**Table 6 to Subpart VVVV--Default Organic HAP Contents of Petroleum Solvent Groups**

As specified in Sec. 63.5758(a)(6), when detailed organic HAP content data for solvent blends are not available, you may use the values in the following table:

Solvent type	Average organic HAP content, percent by mass	Typical organic HAP, percent by mass
Aliphatic (Mineral Spirits 135, Mineral Spirits 150 EC, Naphtha, Mixed Hydrocarbon, Aliphatic Hydrocarbon, Aliphatic Naptha, Naphthol Spirits, Petroleum Spirits, Petroleum Oil, Petroleum Naphtha, Solvent Naphtha, Solvent Blend.).	3	1% Xylene, 1% Toluene, and 1% Ethylbenzene.
Aromatic (Medium-flash Naphtha, High-flash Naphtha, Aromatic Naphtha, Light Aromatic Naphtha, Light Aromatic Hydrocarbons, Aromatic Hydrocarbons, Light Aromatic Solvent.).	6	4% Xylene, 1% Toluene, and 1% Ethylbenzene

**Table 7 to Subpart VVVV--Applicability and Timing of Notifications**

As specified in Sec. 63.5761(a), you must submit notifications according to the following table:

If your facility	You must submit	By this date
1. Is an existing source subject to this subpart	An initial notification containing the information specified in Sec. 63.9(b)(2).	No later than the dates specified in Sec. 63.9(b)(2).
2. Is a new source subject to this subpart	The notification specified in 63.9(b) (3) to (5).	No later than the dates specified in Sec. 63.9(b)(4) and (5).
3. Qualifies for a compliance extension specified in Sec. 63.9(c). n as	A request for a compliance extension as specified in Sec. 63.9(c)	No later than the dates specified in Sec. 63.6(i).
4. Is complying with organic HAP content limits, application equipment requirements; or MACT model point value averaging provisions.	A notification of compliance status as specified in Sec. 63.9(h).	No later than 30 calendar days after the end of the first 12-month averaging period after your facility's compliance date.
5. Is complying by using an add-on control device	a. notification of intent to conduct a date specified in performance test as specified in Sec. 63.9(e). b. A notification of the date for the continuous monitoring system performance evaluation as specified in Sec. 63.9(g). c. A notification of compliance status as specified in Sec. 63.9(h).	No later than the date specified in Sec. 63.9(e).  With the notification of intent to conduct a performance test.  No later than 60 calendar days after the completion of the add-on control device performance test and continuous

		monitoring system performance evaluation.
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**Table 8 to Subpart VVVV--Applicability of General Provisions (40 CFR Part 63, Subpart A) to Subpart VVVV**

As specified in Sec. 63.5773, you must comply with the applicable requirements of the General Provisions according to the following table:

Citation	Requirement	Applies to Subpart VVVV	Explanation
Sec. 63.1(a)	General Applicability	Yes	
Sec. 63.1(b)	Initial Applicability Determination	Yes	
Sec. 63.1(c)(1)	Applicability After Standard Established	Yes	Area sources are not regulated by subpart VVVV.
Sec. 63.1(c)(2)		Yes	
Sec. 63.1(c)(3)		No	[Reserved]
Sec. 63.1(c)(4)-(5)		Yes	
Sec. 63.1(d)		No	[Reserved]
Sec 63.1(e)	Applicability of Permit Program.	Yes	
Sec. 63.2	Definitions	Yes	Additional definitions are found in Sec. 63.5779.
Sec. 63.3	Units and Abbreviations	Yes	
Sec. 63.4(a)	Prohibited Activities	Yes	
Sec. 63.4(b)-(c)	Circumvention/ Severability	Yes	
Sec. 63.5(a)	Construction/ Reconstruction	Yes	
Sec. 63.5(b)	Requirements for Existing, Newly	Yes	

	Constructed, and Reconstructed Sources		
Sec. 63.5(c)		No	[Reserved]
Sec. 63.5(d)	Application for Approval of Construction/ Reconstruction	Yes	
Sec. 63.5(e)	Approval of Construction/ Reconstruction	Yes	
Sec. 63.5(f)	Approval of Construction/ Reconstruction Based on prior State Review.	Yes	
Sec. 63.6(a)	Compliance with Standards and Maintenance Requirements— Applicability	Yes	
Sec. 63.6(b)	Compliance Dates for New and Reconstructed Sources	Yes	Sec. 63.695 specifies compliance dates, including the compliance date for new area sources that become major sources after the effective date of the rule
Sec. 63.6(c)	Compliance Dates for Existing Sources	Yes	Sec. 63.5695 specifies compliance dates, including the compliance date for existing area sources that become major sources after the effective date of the rule
Sec. 63.6(d)		No	[Reserved]
Sec. 63.6(e)(1)-(2)	Operation and Maintenance Requirements	No	Operating requirements for open molding operations with add-on controls are specified in Sec. 63.5725.
Sec. 63.6(e)(3)	Startup, Shut Down, and Malfunction Plans	Yes	Only sources with add-on controls must complete startup, shutdown, and malfunction plans.
Sec. 63.6(f)	Compliance with Nonopacity Emission Standards	Yes	
Sec. 63.6(g)	Use of an Alternative Nonopacity Emission Standard	Yes	
Sec. 63.6(h)	Compliance with Opacity/ Visible Emissions Standards	No	Subpart VVVV does not specify opacity or visible emission standards
	<b>Citation</b>	<b>Requirement</b>	<b>Applies to Subpart VVVV</b>
			<b>Explanation</b>
Sec. 63.6(i)	Extension of Compliance with Emission Standards.	Yes	
Sec. 63.6(j)	Exemption from Compliance with Emission Standards.	Yes	
Sec. 63.7(a)(1)	Performance Test Requirements	Yes	
Sec. 63.7(a)(2)	Dates for performance tests	No	Sec. 63.5716 specifies performance test dates
Sec. 63.7(a)(3)	Performance testing at other times	Yes	
Sec. 63.7(b)-(h)	Other performance testing requirements	Yes	
Sec. 63.8(a)(1)-(2)	Monitoring Requirements - Applicability	Yes	All of Sec. 63.8 applies only to sources with add-on controls. Additional monitoring requirements for sources with add-on controls are found in Sec. 63.5725.
Sec. 63.8(a)(3)		No	Reserved
Sec. 63.8(a)(4)		No	Subpart VVVV does not refer directly or indirectly to Sec. 63.11
Sec. 63.8(b)(1)	Conduct of Monitoring	Yes	
Sec. 63.8(b)(2)-(3)	Multiple Effluents and Multiple Continuous Monitoring Systems (CMS)	Yes	Applies to sources that use a CMS on the control device stack.

Sec. 63.8(c)(1)-(4)		Yes	Continuous Monitoring System Operation and Maintenance
Sec. 63.8(c)(5)	Continuous Opacity Monitoring Systems (COMS)	No	Subpart VVVV does not have opacity or visible emission standards
Sec. 63.8(c)(6)-(8)	Continuous Monitoring System Calibration Checks and Out-of-Control Periods	Yes	
Sec. 63.8(d)	Quality Control Program	Yes	
Sec. 63.8(e)	CMS Performance Evaluation	Yes	
Sec. 63.8(f)(1)-(5)	Use of an Alternative Monitoring Method	Yes	
Sec. 63.8(f)(6)	Alternative to Relative Accuracy Test	Yes	Applies only to sources that use continuous emission monitoring systems (CEMS).
Sec. 63.8(g)	Data Reduction	Yes	
Sec. 63.9(a)	Notification Requirements - Applicability	Yes	
Sec. 63.9(b)	Initial Notifications	Yes	
Sec. 63.9(c)	Request for Compliance Extension	Yes	
Sec. 63.9(d)	Notification that a New Source is Subject to Special Compliance Requirements	Yes	
Sec. 63.9(e)	Notification of Performance Test	Yes	Applies only to sources with add-on controls
Sec. 63.9(f)	Notification of Visible Emissions/Opacity Test	No	Subpart VVVV does not specify opacity or visible emission standards
Sec. 63.9(g)(1)	Additional CMS Notifications--Date of CMS Performance Evaluation	Yes	Applies only to sources with add-on controls
Sec. 63.9(g)(2)	Use of COMS Data	No	Subpart VVVV does not require the use of COMS
Sec. 63.9(g)(3)	Alternative to Relative Accuracy Testing	Yes	Applies only to sources with CEMS
Sec. 63.9(h)	Notification of Compliance Status	Yes	
Sec. 63.9(i)	Adjustment of Deadlines	Yes	
Sec. 63.9(j)	Change in Previous Information	Yes	
Sec. 63.10(a)	Recordkeeping/Reporting Applicability	Yes	
Sec. 63.10(b)(1)	General Recordkeeping Requirements	Yes	Secs. 63.567 and 63.5770 specify additional recordkeeping requirements.
	<b>Citation</b>	<b>Requirement</b>	<b>Applies to Subpart VVVV</b>
			<b>Explanation</b>
Sec. 63.10(b)(2)(i)-(xi)	Recordkeeping Relevant to Startup, Shutdown, and Malfunction Periods and CMS.	Yes	Applies only to sources with add-on controls
Sec. 63.10(b)(2)(xii)-(xiv)	General Recordkeeping Requirements	Yes	
Sec. 63.10(b)(3)	Recordkeeping Requirements for Applicability Determinations	Yes	Sec. 63.5686 specifies applicability determinations for non-major sources.
Sec. 63.10(c)	Additional Recordkeeping for Sources with CMS	Yes	Applies only to sources with add-on controls
Sec. 63.10(d)(1)	General Reporting Requirements	Yes	Sec. 63.5764 specifies additional reporting requirements
Sec. 63.10(d)(2)	Performance Test Results	Yes	Sec. 63.5764 specifies additional requirements for reporting performance test results
Sec. 63.10(d)(3)	Opacity or Visible Emissions Observations	No	Subpart VVVV does not specify opacity or visible emission standards
Sec. 63.10(d)(4)	Progress Reports for Sources with Compliance Extensions	Yes	
Sec. 63.10(d)(5)	Startup, Shutdown, and Malfunction Reports	Yes	Applies only to sources with add-on controls
Sec. 63.10(e)(1)	Additional CMS Reports- General	Yes	Applies only to sources with add-on controls

Sec. 63.10(e)(2)	Reporting Results of CMS Performance Evaluations	Yes	Applies only to sources with add-on controls
Sec. 63.10(e)(3)	Excess Emissions/CMS Performance Reports	Yes	Applies only to sources with add-on controls
Sec. 63.10(e)(4)	COMS Data Reports	No	Subpart VVVV does not specify opacity or visible emission standards
Sec. 63.10(f)	Recordkeeping/Reporting Waiver	Yes	
Sec. 63.11	Control Device Requirements-Applicability	No	Facilities subject to subpart VVVV do not use flares as control devices
Sec. 63.12	State Authority and Delegations	Yes	
Sec. 63.13	Addresses	Yes	
Sec. 63.14	Incorporation by Reference	Yes	
Sec. 63.15	Availability of Information/Confidentiality	Yes	Sec. 63.5776 lists hose sections of subpart A that are not delegated.

Change No. 31.

The Quarterly Report for the source-wide VOC emission limit has been modified as follows:

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 and 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) **VOC emissions from the paint booths, lamination and foam filling areas, and the assembly, subassembly, and upholstery areas shall be based on the VOC input.**

~~(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.

Change No. 32.

The Part 70 Quarterly Report for HAPs has been deleted since the source-wide HAP limit under 326 IAC 2-4.1 is not applicable. A Part 70 Quarterly Report has been added for the BACT limit for the assembly, subassembly and upholstery area.

**~~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)
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Month 1						
Month 2						
Month 3						

9 — Deviation(s) occurred in this quarter.  
 9 — Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
 Title/Position: \_\_\_\_\_  
 Signature: \_\_\_\_\_  
 Date: \_\_\_\_\_  
 Phone: \_\_\_\_\_

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

**Part 70 Quarterly Report  
 BACT Limit**

**Source Name:** Thunderbird Products, Inc.  
**Source Address:** 2200 West Monroe Street, Decatur, Indiana 46733  
**Mailing Address:** 2200 West Monroe Street, Decatur, Indiana 46733  
**Part 70 Permit No.:** T001-5903-00031  
**Facility:** Assembly, subassembly, upholstery area (AU1)  
**Parameter:** Volatile Organic Compounds (VOC)  
**Limit:**

- (1) The VOC content of the adhesives and sealants applied shall not exceed 9.5 pounds per gallon less water.
- (2) 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 at the end of each month.

**YEAR:**

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

**No deviation occurred in this quarter.**

**Deviation/s occurred in this quarter.**  
**Deviation has been reported on:**

**Submitted by:** \_\_\_\_\_  
**Title / Position:** \_\_\_\_\_  
**Signature:** \_\_\_\_\_  
**Date:** \_\_\_\_\_  
**Phone:** \_\_\_\_\_

**Attach a signed certification to complete this report.**

*Change No. 33.*

The address of the Office of Air Quality has been updated as follows:

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

<b>Conclusion and Recommendation</b>
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The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Source Modification No. 001-22370-00031. The operation of this boat manufacturing source shall be subject to the conditions of the attached proposed Part 70 Significant Permit Modification No. 001-22659-00031. The staff recommend to the Commissioner that the Part 70 Significant Source Modification and Part 70 Significant Permit Modification be approved.

**Appendix A: Emissions Calculations**  
**Form DD: Reinforced Plastics and Composites**  
**Open Molding Operations\***  
**Styrene- Gelcoat Application STB13-STB24**

**Company Name:** Thunderbird Products, Inc.  
**Address City IN Zip:** 2200 West Monroe Street, Decatur, IN 46733  
**Source Modification No:** 001-22370-00031  
**Permit Modification Number:** 001-22659-00031  
**Pit ID:** 001-00031  
**Reviewer:** Madhurima D. Moulik  
**Date:** 2/20/2006

Emission Unit ID	Material Name	Wt. % Styrene	lb/unit	unit/hour	UEF (lb/ton)	VOC/HAP (lb/day)	VOC/HAP (TPY)
STB13	Gelcoat White	31.7600%	209.00	0.00571	0.445	4.05	0.74
STB14	Gelcoat White	31.7600%	188.00	0.00571	0.445	3.64	0.66
STB15	Gelcoat White	31.7600%	188.00	0.00571	0.445	3.64	0.66
STB16	Gelcoat White	31.7600%	184.00	0.00571	0.445	3.56	0.65
STB17	Gelcoat White	31.7600%	184.00	0.00571	0.445	3.56	0.65
STB18	Gelcoat White	31.7600%	148.00	0.00571	0.445	2.87	0.52
STB19	Gelcoat White	31.7600%	0.00	0.02000	0.445	0.00	0.00
STB20	Gelcoat White	31.7600%	244.00	0.00571	0.445	4.73	0.86
STB21	Gelcoat White	31.7600%	209.00	0.00570	0.445	4.04	0.74
STB22	Gelcoat White	31.7600%	0.00	0.01250	0.445	0.00	0.00
STB23	Gelcoat White	31.7600%	0.00	0.01670	0.445	0.00	0.00
STB24	Gelcoat White	31.7600%	0.00	0.02000	0.445	0.00	0.00
<b>Total VOC/HAP from Resin and Gel Use</b>							<b>5.49</b>

\* Open Molding Operations include the following: manual application, mechanical application, gel coat application, and filament application.

#### METHODOLOGY

Assume all of the monomer is styrene.

Use the standard VOC emissions calculation spreadsheet to calculate catalyst emissions and cleaning emissions (assume that 100% of the VOC and/or HAP in the catalysts and solvents used is emitted). Use the emission factors based on the type of application from "Unified Emission Factors for Open Molding of Composites," Composites Fabricators Association (April 1999) to calculate resin and gelcoat. UEF: The Unified Emission Factor is the emission factor for the resin or gel styrene content that can be determined using the UEF Table.

Potential VOC (lb/day) for resins or gels = Pounds of material used per unit(lb/unit) \* Maximum usage (unit/hr) \* UEF (lb styrene/ton material) \* 24 hrs/day \* 1 ton material/2000 lbs material

Potential VOC (ton/year) = Potential VOC (lb/day) \* 365 days/year \* (1 ton/2000 lb)

**Appendix A: Emissions Calculations  
Reinforced Plastics and Composites  
Open Molding Operations\*  
Styrene + MMA Tooling From GSB3**

**Company Name:** Thunderbird Products, Inc.  
**Address City IN Zip:** 2200 West Monroe Street, Decatur, IN 46733  
**Source Modification No:** 001-22370-00031  
**Permit Modification Number:** 001-22659-00031  
**Plt ID:** 001-00031  
**Reviewer:** Madhurima D. Moulik  
**Date:** 2/20/2006

Emission Uni	Material Name	Wt % Styrene/MMA	Annual Usage (lb)	UEF (lb/ton)	VOC/HAP (lb/day)	Production hr/yr	VOC/HAP (TPY)
GSB3	Tangerine Tool	36.91%	1500.00	377.00	0.77	200.00	6.19
GSB3	Tangerine Tool	3.00%	1500.00	45.00	0.09	200.00	0.74
<b>Total VOC/HAP from Resin and Gel Use</b>							<b>6.93</b>

\* Open Molding Operations include the following: manual application, mechanical application, gel coat application, and filament application.

For all other fiberglass operations, use the AP-42 emission factors and the calculation spreadsheet fglassap42.wb3.

**METHODOLOGY**

Use the standard VOC emissions calculation spreadsheet to calculate catalyst emissions and cleaning emissions (assume that 100% of the VOC and/or HAP in the catalysts and solvents used is emitted).

Use the emission factors based on the type of application from "Unified Emission Factors for Open Molding of Composites," Composites Fabricators Association (April 1999) to calculate resin and gelcoat emissions.

UEF: The United Emission Factor is the emission factor for the resin or gel styrene content that can be determined using the UEF Table.

UEF for gelcoat application with 36.91% Styrene = 377 lb of Styrene/ton of gelcoat

UEF for gelcoat application with 3% MMA = 45 lb of MMA/ton of gelcoat

Potential VOC (lb/day) for resins or gels = Annual Usage of gelcoat (lb/yr) \* UEF (lb styrene or MMA/ton material) \* 1 ton material/2000 lbs material\* 1/365 days per year

Potential VOC (ton/year) is derived based on annual usage of material, adjusted for hours of production for the usage (200 hours each year)

Potential VOC (ton/year) = Potential VOC (lb/day) \* 365 days/year \* (1 ton/2000 lb)\*8760 hrs per year/200 production hours

Appendix A: Emissions Calculations  
 Reinforced Plastics and Composites  
 Open Molding Operations\*  
 Styrene - Manual Resin Application - STB13-STB24

Company Name: Thunderbird Products, Inc.  
 Address City IN Zip: 2200 West Monroe Street, Decatur, IN 46733  
 Source Modification Number: 001-22370-00031  
 Permit Modification No: 001-22659-00031  
 Pit ID: 001-00031  
 Reviewer: Madhurima D. Moulik  
 Date: 2/20/2006

Emission Unit ID	Material Name	Wt % Styrene	lb/unit	unit/hour	Multiplier	VOC/HAP (lb/day)	VOC/HAP (TPY)
STB13	Ashland 1000	32.94%	64.00	0.00571	0.126	0.364	0.066
STB13	Ashland 5000	32.04%	19.00	0.00571	0.126	0.105	0.019
STB14	Ashland 1000	32.94%	57.00	0.00571	0.126	0.324	0.059
STB14	Ashland 5000	32.04%	23.00	0.00571	0.126	0.127	0.023
STB15	Ashland 1000	32.94%	57.00	0.00571	0.126	0.324	0.059
STB15	Ashland 5000	32.04%	15.00	0.00571	0.126	0.083	0.015
STB16	Ashland 1000	32.94%	30.00	0.00571	0.126	0.171	0.031
STB16	Ashland 5000	32.04%	22.00	0.00571	0.126	0.122	0.022
STB17	Ashland 1000	32.94%	2.00	0.00571	0.126	0.011	0.002
STB17	Ashland 5000	32.04%	50.00	0.00571	0.126	0.277	0.050
STB18	Ashland 1000	32.94%	24.00	0.00571	0.126	0.137	0.025
STB18	Ashland 5000	32.04%	19.00	0.00571	0.126	0.105	0.019
STB19	Ashland 1000	32.94%	0.00	0.02000	0.126	0.000	0.000
STB19	Ashland 5000	32.04%	29.00	0.02000	0.126	0.562	0.103
STB20	Ashland 1000	32.94%	42.00	0.00571	0.126	0.239	0.044
STB20	Ashland 5000	32.04%	25.00	0.00571	0.126	0.138	0.025
STB21	Ashland 1000	32.94%	71.00	0.01250	0.126	0.884	0.161
STB21	Ashland 5000	32.04%	21.00	0.01250	0.126	0.254	0.046
STB22	Ashland 1000	32.94%	28.00	0.01250	0.126	0.349	0.064
STB22	Ashland 5000	32.04%	9.00	0.01250	0.126	0.109	0.020
STB23	Ashland 1000	32.94%	28.00	0.01670	0.126	0.466	0.085
STB23	Ashland 5000	32.04%	9.00	0.01670	0.126	0.146	0.027
STB24	Ashland 1000	32.94%	28.00	0.02000	0.126	0.558	0.102
STB24	Ashland 5000	32.04%	9.00	0.02000	0.126	0.174	0.032
<b>Total VOC/HAP from Resin and Gel Use</b>							<b>1.100</b>

\* Open Molding Operations include the following: manual application, mechanical application, gel coat application, and filament application.

METHODOLOGY

Assume all of the monomer is styrene.

Use the standard VOC emissions calculation spreadsheet to calculate catalyst emissions and cleaning emissions (assume that 100% of the VOC and/or HAP in the catalysts and solvents used is emitted).

Use the emission factors based on the type of application from "Unified Emission Factors for Open Molding of Composites," Composites Fabricators Association (April 1999) to calculate resin and gelcoat emissions.

UEF: The United Emission Factor is the emission factor for the resin or gel styrene content that can be determined using the UEF Table.

UEF for manual resin application for less than 33% Styrene = 0.126 (Multiplier) x %Styrene x 2000 lb Styrene/ton of resin processed

Potential VOC (lb/day) for resins or gels = Pounds of material used per unit(lb/unit) \* Maximum usage (unit/hr) \* UEF (lb styrene/ton material) \* 24 hrs/day \* 1 ton material/2000 lbs material

Potential VOC (ton/year) = Potential VOC (lb/day) \* 365 days/year \* (1 ton/2000 lb)

Appendix A: Emissions Calculations  
 Reinforced Plastics and Composites  
 Open Molding Operations\*  
 Styrene-Mechanical Resin Application STB13-STB24

Company Name: Thunderbird Products, Inc.  
 Address City IN Zip: 2200 West Monroe Street, Decatur, IN 46733  
 Source Modification No: 001-22370-00031  
 Permit Modification No: 001-22659-00031  
 Plt ID: 001-00031  
 Reviewer: Madhurima D. Moulik  
 Date: 2/20/2006

Emission Unit ID	Material Name	Wt % Styrene	lb/unit	unit/hour	Multiplier	VOC/HAP (lb/day)	VOC/HAP (TPY)
STB13	Ashland 1000	32.94%	1543.00	0.00571	0.107	7.45	1.36
STB13	Ashland 5000	32.04%	450.00	0.00571	0.107	2.11	0.39
STB14	Ashland 1000	32.94%	1379.00	0.00571	0.107	6.66	1.22
STB14	Ashland 5000	32.04%	562.00	0.00571	0.107	2.64	0.48
STB15	Ashland 1000	32.94%	1360.00	0.00571	0.107	6.57	1.20
STB15	Ashland 5000	32.04%	361.00	0.00571	0.107	1.70	0.31
STB16	Ashland 1000	32.94%	730.00	0.00571	0.107	3.53	0.64
STB16	Ashland 5000	32.04%	519.00	0.00571	0.107	2.44	0.44
STB17	Ashland 1000	32.94%	43.00	0.00571	0.107	0.21	0.04
STB17	Ashland 5000	32.04%	1197.00	0.00571	0.107	5.62	1.03
STB18	Ashland 1000	32.94%	573.00	0.00571	0.107	2.77	0.51
STB18	Ashland 5000	32.04%	457.00	0.00571	0.107	2.15	0.39
STB19	Ashland 1000	32.94%	0.00	0.02	0.107	0.00	0.00
STB19	Ashland 5000	32.04%	691.00	0.02	0.107	11.37	2.08
STB20	Ashland 1000	32.94%	1017.00	0.00571	0.107	4.91	0.90
STB20	Ashland 5000	32.04%	606.00	0.00571	0.107	2.85	0.52
STB21	Ashland 1000	32.94%	1709.00	0.00571	0.107	8.25	1.51
STB21	Ashland 5000	32.04%	516.00	0.00571	0.107	2.42	0.44
STB22	Ashland 1000	32.94%	666.00	0.0125	0.107	7.04	1.29
STB22	Ashland 5000	32.04%	210.00	0.0125	0.107	2.16	0.39
STB23	Ashland 1000	32.94%	666.00	0.0167	0.107	9.41	1.72
STB23	Ashland 5000	32.04%	210.00	0.0167	0.107	2.89	0.53
STB24	Ashland 1000	32.94%	666.00	0.02	0.107	11.27	2.06
STB24	Ashland 5000	32.04%	210.00	0.02	0.107	3.46	0.63
<b>Total VOC/HAP from Resin and Gel Use</b>						<b>20.05</b>	

\* Open Molding Operations include the following: manual application, mechanical application, gel coat application, and filament application.

METHODOLOGY

Assume all of the monomer is styrene.

Use the standard VOC emissions calculation spreadsheet to calculate catalyst emissions and cleaning emissions (assume that 100% of the VOC and/or HAP in the catalysts and solvents used is emitted).

Use the emission factors based on the type of application from "Unified Emission Factors for Open Molding of Composites," Composites Fabricators Association (April 1999) to calculate resin and gelcoat emissions.

UEF: The United Emission Factor is the emission factor for the resin or gel styrene content that can be determined using the UEF Table.

UEF for manual resin application for less than 33% Styrene = 0.107 (Multiplier) x %Styrene x 2000 lb Styrene/ton of resin processed

Potential VOC (lb/day) for resins or gels = Pounds of material used per unit(lb/unit) \* Maximum usage (unit/hr) \* UEF (lb styrene/ton material) \* 24 hrs/day \* 1 ton material/2000 lbs material

Potential VOC (ton/year) = Potential VOC (lb/day) \* 365 days/year \* (1 ton/2000 lb)

**Appendix A: Emissions Calculations  
Reinforced Plastics and Composites  
Open Molding Operations\*  
MMA From Gelcoat White Application STB13-STB24**

**Company Name:** Thunderbird Products, Inc.  
**Address City IN Zip:** 2200 West Monroe Street, Decatur, IN 46733  
**Source Modification No:** 001-22370-00031  
**Permit Modification No:** 001-22659-00031  
**Plt ID:** 001-00031  
**Reviewer:** Madhurima D. Moulik  
**Date:** 2/20/2006

Emission Unit ID	Material Name	Wt % MMA	lb/unit	unit/hour	UEF (lb/ton)	VOC/HAP (lb/day)	VOC/HAP (TPY)
STB13	Ashland 1000	2.0000%	209.00	0.00571	30.00	0.43	0.08
STB14	Ashland 1000	2.0000%	188.00	0.00571	30.00	0.39	0.07
STB15	Ashland 1000	2.0000%	188.00	0.00571	30.00	0.39	0.07
STB16	Ashland 1000	2.0000%	184.00	0.00571	30.00	0.38	0.07
STB17	Ashland 1000	2.0000%	184.00	0.00571	30.00	0.38	0.07
STB18	Ashland 1000	2.0000%	148.00	0.00571	30.00	0.30	0.06
STB19	Ashland 1000	2.0000%	0.00	0.02000	30.00	0.00	0.00
STB20	Ashland 1000	2.0000%	244.00	0.00571	30.00	0.50	0.09
STB21	Ashland 1000	2.0000%	209.00	0.01250	30.00	0.94	0.17
STB22	Ashland 1000	2.0000%	0.00	0.01250	30.00	0.00	0.00
STB23	Ashland 1000	2.0000%	0.00	0.01670	30.00	0.00	0.00
STB24	Ashland 1000	2.0000%	0.00	0.02000	30.00	0.00	0.00
<b>Total VOC/HAP and PM from Resin and Gel Use</b>							<b>0.68</b>

\* Open Molding Operations include the following: manual application, mechanical application, gel coat application, and filament application.

#### METHODOLOGY

Use the standard VOC emissions calculation spreadsheet to calculate catalyst emissions and cleaning emissions (assume that 100% of the VOC and/or HAP in the catalysts and solvents used is emitted). Use the emission factors based on the type of application from "Unified Emission Factors for Open Molding of Composites," Composites Fabricators Association (April 1999) to calculate resin and gelcoat UEF: The United Emission Factor is the emission factor for the resin or gel MMA content that can be determined using the UEF Table.

Potential VOC (lb/day) for resins or gels = Pounds of material used per unit(lb/unit) \* Maximum usage (unit/hr) \* UEF (lb MMA/ton material) \* 24 hrs/day \* 1 ton material/2000 lbs material

Potential VOC (ton/year) = Potential VOC (lb/day) \* 365 days/year \* (1 ton/2000 lb)

**Appendix A: Emissions Calculations  
 Natural Gas Combustion Only  
 MM BTU/HR <100  
 Air make-Up Units**

**Company Name: Thunderbird Products, Inc.  
 Address City IN Zip: 2200 West Monroe Street, Decatur, IN 46733  
 Source Modification No: 001-22370-00031  
 Permit Modification No: 001-22659-00031  
 Pit ID: 001-00031  
 Reviewer: Madhurima D. Moulik  
 Date: 2/20/2006**

Heat Input Capacity  
 MMBtu/hr

Potential Throughput  
 MMCF/yr

13.2

115.6

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	7.6	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.4	0.4	0.0	5.8	0.3	4.9

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

\*\*Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

**Methodology**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

gasc99.xls 9/95

See page 2 for HAPs emissions calculations.

updated 4/99

**Appendix A: Emissions Calculations  
 Natural Gas Combustion Only  
 MM BTU/HR <100  
 Small Industrial Boiler  
 HAPs Emissions**

**Company Name:** Thunderbird Products, Inc.  
**Address City IN Zip:** 2200 West Monroe Street, Decatur, IN 46733  
**Source Modification No:** 001-22370-00031  
**Permit Modification No:** 001-22659-00031  
**Pit ID:** 001-00031  
**Reviewer:** Madhurima D. Moulik  
**Date:** 2/20/2006

HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	1.214E-04	6.938E-05	4.336E-03	1.041E-01	1.966E-04

HAPs - Metals					
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	2.891E-05	6.360E-05	8.094E-05	2.197E-05	1.214E-04

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above.  
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Appendix A: Emission Calculations  
Reinforced Plastics and Composites  
PM Emissions STB13-STB24, GSB3**

**Company Name: Thunderbird Products, Inc.**  
**Address City IN ZIP: 2200 West Monroe Street, Decatur, IN 46733**  
**Source Modification No: 001-22370-00031**  
**Permit Modification No: 001-22659-00031**  
**Plt ID: 001-00031**  
**Reviewer: Madhurima D. Moulik**  
**Date: 2/20/2006**

Emission Unit ID	Material Name	Wt. % Solids	lb material/unit	unit/hour	Transfer eff.	PM (lb/hr)	PM (tpy)
STB13	Ashland 1000	67.06%	64.00	0.00571	75.00%	0.06	0.27
STB13	Ashland 5000	67.96%	19.00	0.00571	75.00%	0.02	0.08
STB14	Ashland 1000	67.06%	57.00	0.00571	75.00%	0.05	0.24
STB14	Ashland 5000	67.96%	23.00	0.00571	75.00%	0.02	0.10
STB15	Ashland 1000	67.06%	57.00	0.00571	75.00%	0.05	0.24
STB15	Ashland 5000	67.96%	15.00	0.00571	75.00%	0.01	0.06
STB16	Ashland 1000	67.06%	30.00	0.00571	75.00%	0.03	0.13
STB16	Ashland 5000	67.96%	22.00	0.00571	75.00%	0.02	0.09
STB17	Ashland 1000	67.06%	2.00	0.00571	75.00%	0.00	0.01
STB17	Ashland 5000	67.96%	50.00	0.00571	75.00%	0.05	0.21
STB18	Ashland 1000	67.06%	24.00	0.00571	75.00%	0.02	0.10
STB18	Ashland 5000	67.96%	19.00	0.00571	75.00%	0.02	0.08
STB19	Ashland 1000	67.06%	0.00	0.02000	75.00%	0.00	0.00
STB19	Ashland 5000	67.96%	29.00	0.02000	75.00%	0.10	0.43
STB20	Ashland 1000	67.06%	42.00	0.00571	75.00%	0.04	0.18
STB20	Ashland 5000	67.96%	25.00	0.00571	75.00%	0.02	0.11
STB21	Ashland 1000	67.06%	71.00	0.01250	75.00%	0.15	0.65
STB21	Ashland 5000	67.96%	21.00	0.01250	75.00%	0.04	0.20
STB22	Ashland 1000	67.06%	28.00	0.01250	75.00%	0.06	0.26
STB22	Ashland 5000	67.96%	9.00	0.01250	75.00%	0.02	0.08
STB23	Ashland 1000	67.06%	28.00	0.01670	75.00%	0.08	0.34
STB23	Ashland 5000	67.96%	9.00	0.01670	75.00%	0.03	0.11
STB24	Ashland 1000	67.06%	28.00	0.02000	75.00%	0.09	0.41
STB24	Ashland 5000	67.96%	9.00	0.02000	75.00%	0.03	0.13
STB13	Gelcoat White	66.24%	209.00	0.00571	100.00%	0.00	0.00
STB14	Gelcoat White	66.24%	188.00	0.00571	100.00%	0.00	0.00
STB15	Gelcoat White	66.24%	188.00	0.00571	100.00%	0.00	0.00
STB16	Gelcoat White	66.24%	184.00	0.00571	100.00%	0.00	0.00
STB17	Gelcoat White	66.24%	184.00	0.00571	100.00%	0.00	0.00
STB18	Gelcoat White	66.24%	148.00	0.00571	100.00%	0.00	0.00
STB19	Gelcoat White	66.24%	0.00	0.02000	100.00%	0.00	0.00
STB20	Gelcoat White	66.24%	244.00	0.00571	100.00%	0.00	0.00
STB21	Gelcoat White	66.24%	209.00	0.01250	100.00%	0.00	0.00
STB22	Gelcoat White	66.24%	0.00	0.01250	100.00%	0.00	0.00
STB23	Gelcoat White	66.24%	0.00	0.01670	100.00%	0.00	0.00
STB24	Gelcoat White	66.24%	0.00	0.02000	100.00%	0.00	0.00

4.51

Emission Unit ID	Material Name	Wt. % Solids	Annual Usage (lb)	Production hrs	Transfer eff.	PM (tpy)
GSB3	Tangerine Tool	60.91%	1500.00	200.00	75.00%	5.00

PTE (tons/yr) = **9.51**

PTE (controlled) (90% control efficiency)= **0.95 tpy**

Appendix A: Emission Calculations  
Reinforced Plastics and Composites  
Total Emissions

Company Name: Thunderbird Products, Inc.  
Address City IN ZIP: 2200 West Monroe Street, Decatur, IN 46733  
Source Modification No: 001-22370-00031  
Permit Modification No: 001-22650-00031  
Plt ID: 001-00031  
Reviewer: Madhurima D. Moulik  
Date: 2/20/2006

Emission Unit ID	Material	Emissions in tons per year (tpy)					PM/PM10
		Styrene	MMA	Comb. HAP	VOC		
STB13-STB24	Gelcoat White	5.49	0.68	6.17	6.17	0.00	
STB13-STB24 (Manual)	Ashland 1000+5000	1.10	0.00	1.10	1.10	4.51	Manual+Mechanical
STB13-STB24 (Mech)	Ashland 1000+5000	20.05	0.00	20.05	20.05		

Emission Unit ID		Styrene	MMA	Comb. HAP	VOC	PM/PM10
GSB3	Tangerine Tool	6.19	0.74	6.93	6.93	5.00
Combustion (Heaters)		0.00	0.00	0.00	0.30	0.40
			PTE (tpy) =	34.25	34.55	9.91

Emission Unit ID		SO2	NOx	CO
Combustion (Heaters)		0.00	5.80	4.90
	PTE (tpy) =	0.00	5.80	4.90

Pollutant	PTE (tpy)
PM	9.91
PM-10	9.91
SO2	0
NOx	5.8
VOC	34.55
CO	4.9
Single HAP (highest)	32.83
Combination HAP	34.55