



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant
DATE: January 8, 2007
RE: Bennington Marine, LLC / 039-23730-00098
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.

Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

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Mr. Keenan Burch
Bennington Marine, LLC
52791 County Road 113
Elkhart, Indiana 46514
January 8, 2007

Re: 039-23730-00098
Significant Source Modification to:
Part 70 permit No.: T039-21368-00098

Dear Mr. Burch:

Bennington Marine, LLC was issued Part 70 operating permit T039-21368-00098 on December 27, 2005 for a recreational boat manufacturing plant. An application to modify the source was received on October 5, 2006. Pursuant to 326 IAC 2-7-10.5 the following emission units are approved for construction at the source to be used in the manufacture of fiberglass recreational boat hulls and decks:

- (a) One (1) lamination layup operation, identified as LAM2, equipped with eight (8) Fluid Impingement Technology (FIT) production chop guns, and one (1) FIT gun used as a backup, with a total maximum capacity of 2 units per hour; and
- (b) One (1) acetone recycling unit.

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, and ask for Aida De Guzman or extension (3-4972), or dial (317) 233-4972.

Sincerely,

Original document signed by

Nisha Sizemore, Chief
Permits Branch
Office of Air Quality

Attachments
APD

cc: File - Elkhart County
Elkhart County Health Department
Northern Regional Office
Air Compliance Section Inspector – Greg Wingstrom, Paul Karkiewicz
Compliance Data Section
Administrative and Development



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SIGNIFICANT SOURCE MODIFICATION TO A PART 70 SOURCE

OFFICE OF AIR QUALITY

**Bennington Marine, LLC
52791 County Road 113
Elkhart, Indiana 46514**

(herein known as the Permittee) is hereby authorized to construct 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.

Significant Source Modification No.: 039-23730-00098	
Issued by: <i>Original document signed by</i> Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: January 8, 2007

SECTION D.1 FACILITY CONDITIONS

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

One (1) lamination layup operation, identified as LAM2, equipped with eight (8) Fluid Impingement Technology (FIT) production chop guns, and one (1) FIT gun used as a backup, with a total maximum capacity of 2 units per hour.

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

General Construction Conditions

D.1.1 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.1.2 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.1.3 Emission Offset Minor Limit for VOC [326 IAC 2-3]

The monomer content of the resins and gelcoat used from the one (1) lamination layup operation, identified as LAM2, including the VOC usage from clean-up solvents shall be limited such that the VOC emissions shall be limited to 99.5 tons per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance with this limit shall render 326 IAC 2-3, Emission Offset rule requirements not applicable.

D.1.6 Work Practices Standards [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.1.7 Operator Training [326 IAC 20-48-4]

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:
 - (1) All personnel hired shall be trained within fifteen (15) days of hiring.
 - (2) To ensure training goals listed in subsection (b) are maintained, all personnel shall be given refresher training annually.
 - (3) 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:
 - (1) Appropriate application techniques.
 - (2) Appropriate equipment cleaning procedures.
 - (3) 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:
 - (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.
- (d) Records of prior training programs and former personnel are not required to be maintained.

D.1.9 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

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

D.1.10 Particulate Matter (PM) [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), the particulate overspray emissions from one (1) lamination layup operation, identified as LAM2 shall be controlled by dry filtration system and shall be in place at all times whenever lamination layup process is being made.

D.1.11 Testing Requirements [326 IAC 2-3] [326 IAC 8-1-6] [326 IAC 20-48]

Compliance with the VOC/HAP monomer content and usage limitations in Condition D.1.3 and D.1.5 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.1.12 VOC Emissions

Compliance with the VOC emissions limit in Condition D.1.3 shall be determined using the following equation:

$$\text{VOC Emissions (tons/month)} = ((A * B) / 2000) * \text{UEF} / 2000$$

Where: A = Resin density in pounds per gallon (lbs/gal)
B = Resin usage in gallons per month (gal/mo)
UEF = Unified Emission Factor for Open Molding of Composites in pounds of monomer per ton of resin (lb/ton)

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

D.1.13 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filter. To monitor the performance of the dry filter, weekly observations shall be made of the overspray from the one (1) lamination layup operation, identified as LAM2 stacks (LAM1 through LAM8) while one or more of the booths are 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 fiberglass layup emissions from the stacks 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 are observed, the Permittee shall take reasonable response steps in accordance with Section C – Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

D.1.14 Visible Emissions Notations

- (a) Weekly visible emission notations of the fiberglass layup stack exhausts when atomized applicators are used shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

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

D.1.15 Record keeping requirements [[326 IAC 2-3] [326 IAC 8-1-6] [326 IAC 20-48]

- (a) To document compliance with Conditions D.1.3 and D1.5 the Permittee shall maintain records that are complete and sufficient to establish compliance with the VOC/HAP monomer content limits. Records maintained shall be taken monthly. Examples of such records include but are not limited to:
 - (1) The usage by weight and monomer content of each resin and gel coat used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS), manufacturer's certified product data sheets, and calculations necessary to verify the type, amount used, and HAP content of each resin or gel coat.
 - (2) Method of application and other emission reduction techniques for each resin and gel coat used.
 - (3) Monthly calculations demonstrating compliance on an equivalent emissions mass basis if non-compliant resins or gel coats are used during that month.
- (b) To document compliance with Condition D.1.7, the Permittee shall maintain the following training records:
 - (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. Records of prior training programs and former personnel are not required to be maintained.
- (c) To document compliance with Condition D.1.13, the Permittee shall maintain a log of monthly overspray observations, daily inspections of the dry filter.
- (d) To document compliance with Condition D.1.14, the Permittee shall maintain records of weekly visible emission notations of the fiberglass layup stack exhaust.

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

D.1.16 Reporting Requirements

A monthly summary of the information to document compliance with Condition D.1.3, shall be submitted quarterly to the address listed in Section C - General Reporting Requirements, of this permit, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION E.1 FACILITY OPERATION CONDITIONS

Entire Source – Fiberglass Boat Manufacturing and the Aluminum Boat Manufacturing, including the new lamination layup, identified as LAM2.

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

E.1.1 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.1.2 Boat Manufacturing Operations NESHAP [326 IAC 20-48] [40 CFR Part 63, Subpart VVVV]

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

§ 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.

The following provisions of 40 CFR Part 63, Subpart VVVV shall be applicable to Bennington Marine, LLC:

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.
 M_R = mass of production resin used in the past 12 months, excluding any materials exempt under paragraph (d) of this section, megagrams.
 M_{PG} = mass of pigmented gel coat used in the past 12 months, excluding any materials exempt under paragraph (d) of this section, megagrams.
 M_{CG} = mass of clear gel coat used in the past 12 months, excluding any materials exempt under paragraph (d) of this section, megagrams.
 M_{TR} = mass of tooling resin used in the past 12 months, excluding any materials exempt under paragraph (d) of this section, megagrams.
 M_{TG} = 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.

§ 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.)

$$\text{HAP emissions} = [(PV_R)(M_R) + (PV_{PG})(M_{PG}) + (PV_{CG})(M_{CG}) + (PV_{TR})(M_{TR}) + (PV_{TG})(M_{TG})] \quad (\text{Eq 1})$$

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_{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.

PVi =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 (PVi) 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 HAPcontaining 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 HAPcontaining 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.

§ 63.5740 Emission limit for carpet and fabric adhesive operations

- (a) You must use carpet and fabric adhesives that contain no more than 5 percent organic HAP by weight.
- (b) To demonstrate compliance with the emission limit in paragraph (a) of this section, you must determine and record the organic HAP content of the carpet and fabric adhesives using the methods in § 63.5758.

§ 63.5743 Standards for aluminum recreational boat surface coating operations?

- (a) For aluminum wipedown solvent operations and aluminum surface coating operations, you must comply with either the separate emission limits in paragraphs (a)(1) and (2) of this section, or the combined emission limit in paragraph (a)(3) of this section. Compliance with these limitations is based on a 12-month rolling average that is calculated at the end of every month.
 - (1) You must limit emissions from aluminum wipedown solvents to no more than 0.33 kilograms of organic HAP per liter of total coating solids applied from aluminum primers, clear coats, and top coats combined. No limit applies when cleaning surfaces are receiving decals or adhesive graphics.
 - (2) You must limit emissions from aluminum recreational boat surface coatings (including thinners, activators, primers, topcoats, and clear coats) to no more than 1.22 kilograms of organic HAP per liter of total coating solids applied from aluminum primers, clear coats, and top coats combined.
 - (3) You must limit emissions from the combined aluminum surface coatings and aluminum wipedown solvents to no more than 1.55 kilograms of organic HAP per liter of total coating solids applied from aluminum primers, clear coats, and top coats combined.
- (b) You must comply with the work practice standard in paragraph (b)(1), (2), (3), or (4) of this section when cleaning aluminum coating spray guns with solvents containing more than 5 percent organic HAP by weight.
 - (1) Clean spray guns in an enclosed device. Keep the device closed except when you place spray guns in or remove them from the device.
 - (2) Disassemble the spray gun and manually clean the components in a vat. Keep the vat closed when you are not using it.

- (3) Clean spray guns by placing solvent in the pressure pot and forcing the solvent through the gun. Do not use atomizing air during this procedure. Direct the used cleaning solvent from the spray gun into a container that you keep closed when you are not using it.
- (4) An alternative gun cleaning process or technology approved by the Administrator according to the procedures in § 63.6(g).

§ 63.5746 Demonstration of compliance with the emission limits for aluminum wipedown solvents and aluminum coatings

To demonstrate compliance with the emission limits for aluminum wipedown solvents and aluminum coatings specified in § 63.5743(a), you must meet the requirements of paragraphs (a) through (f) of this section.

- (a) Determine and record the organic HAP content (kilograms of organic HAP per kilogram of material, or weight fraction) of each aluminum wipedown solvent and aluminum coating (including primers, topcoats, clear coats, thinners, and activators). Use the methods in § 63.5758 to determine organic HAP content.
- (b) Use the methods in § 63.5758(b) to determine the solids content (liters of solids per liter of coating, or volume fraction) of each aluminum surface coating, including primers, topcoats, and clear coats. Keep records of the solids content.
- (c) Use the methods in § 63.5758(c) to determine the density of each aluminum surface coating and wipedown solvent.
- (d) Compliance is based on a 12- month rolling average calculated at the end of every month. The first 12-month rolling-average period begins on the compliance date specified in § 63.5695.
- (e) At the end of the twelfth month after the compliance date and at the end of every subsequent month, use the procedures in § 63.5749 to calculate the organic HAP from aluminum wipedown solvents per liter of coating solids, and use the procedures in § 63.5752 to calculate the kilograms of organic HAP from aluminum coatings per liter of coating solids.
- (f) Keep records of the calculations used to determine compliance.

§ 63.5749 To calculate the organic HAP content of aluminum wipedown solvents

- (a) Use equation 1 of this section to calculate the weighted-average organic HAP content of aluminum wipedown solvents used in the past 12 months.

$$\text{HAP}_{\text{WD}} = \frac{\sum_{i=1}^n (\text{Vol}_i)(D_i)(W_i)}{\sum_{i=1}^m (\text{Vol}_i)(\text{Solids}_i)} \quad (\text{Eq.1})$$

Where:

HAP_{WD} = weighted-average organic HAP content of aluminum wipedown solvents, kilograms of HAP per liter of total coating solids from aluminum primers, top coats, and clear coats.

n = number of different wipedown solvents used in the past 12 months.
Vol_j = volume of aluminum wipedown solvent j used in the past 12 months, liters.
D_j = density of aluminum wipedown solvent j, kilograms per liter.
W_j = mass fraction of organic HAP in aluminum wipedown solvent j.
m = number of different aluminum surface coatings (primers, top coats, and clear coats) used in the past 12 months.
Vol_i = volume of aluminum primer, top coat, or clear coat i used in the past 12 months, liters.
Solids_i = solids content aluminum primer, top coat, or clear coat i, liter solids per liter of coating.

- (b) Compliance is based on a 12-month rolling average. If the weighted average organic HAP content does not exceed 0.33 kilograms of organic HAP per liter of total coating solids, then you are in compliance with the emission limit specified in § 63.5743(a)(1).

§ 63.5752: To calculate the organic HAP content of aluminum recreational boat Surface coatings

- (a) Use equation 1 of this section to calculate the weighted-average HAP content for all aluminum surface coatings used in the past 12 months.

$$\text{HAP}_{\text{SC}} = \frac{\sum_{i=1}^m (\text{Vol}_i)(D_i)(W_i) + \sum_{k=1}^D (\text{Vol}_k)(D_k)(W_k)}{\sum_{i=1}^m (\text{Vol}_i)(\text{Solids}_i)} \quad (\text{Eq. 1})$$

Where:

HAP_{SC} = weighted-average organic HAP content for all aluminum coating materials, kilograms of organic HAP per liter of coating solids.
m = number of different aluminum primers, top coats, and clear coats used in the past 12 months.
Vol_i = volume of aluminum primer, top coat, or clear coat i used in the past 12 months, liters.
D_i = density of coating i, kilograms per liter.
W_i = mass fraction of organic HAP in coating i, kilograms of organic HAP per kilogram of coating.
p = number of different thinners, activators, and other coating additives used in the past 12 months.
Vol_k = total volume of thinner, activator, or additive k used in the past 12 months, liters.
D_k = density of thinner, activator, or additive k, kilograms per liter.
W_k = mass fraction of organic HAP in thinner, activator, or additive k, kilograms of organic HAP per kilogram of thinner or activator.
Solids_i = solids content of aluminum primer, top coat, or clear coat i, liter solids per liter of coating.

- (b) Compliance is based on a 12-month rolling average. If the weighted average organic HAP content does not exceed 1.22 kilograms of organic HAP per liter of coating solids, then you are in compliance with the emission limit specified in § 63.5743(a)(2).

§ 63.5753 To calculate the combined organic HAP content of aluminum wipedown solvents and aluminum recreational boat surface coatings

- (a) Use equation 1 of this section to calculate the combined weighted average organic HAP content of aluminum wipedown solvents and aluminum recreational boat surface coatings.

$$\text{HAP}_{\text{Combined}} = \text{HAP}_{\text{WD}}\text{HAP}_{\text{SC}} \quad (\text{Eq. 1})$$

Where:

HAP_{WD} = the weighted-average organic HAP content of aluminum wipedown solvents used in the past 12 months, calculated using equation 1 of § 63.5749.

HAP_{SC} = the weighted average organic HAP content of aluminum recreational boat surface coatings used in the past 12 months, calculated using equation 1 of § 63.5752.

- (b) Compliance is based on a 12- month rolling average. If the combined organic HAP content does not exceed 1.55 kilograms of organic HAP per liter of total coating solids, then you are in compliance with the emission limit specified in § 63.5743(a)(3).

§ 63.5755 Demonstration of compliance with the aluminum recreational boat surface coating spray gun cleaning work practice standards

The Permittee must demonstrate compliance with the aluminum coating spray gun cleaning work practice standards by meeting the requirements of paragraph (a) or (b) of this section.

- (a) Demonstrate that solvents used to clean the aluminum coating spray guns contain no more than 5 percent organic HAP by weight by determining organic HAP content with the methods in § 63.5758. Keep records of the organic HAP content determination.
- (b) For solvents containing more than 5 percent organic HAP by weight, comply with the requirements in paragraph (b)(1) or (b)(2), and paragraph (b)(3) of this section.
- (1) If you are using an enclosed spray gun cleaner, visually inspect it at least once per month to ensure that covers are in place and the covers have no visible gaps when the cleaner is not in use, and that there are no leaks from hoses or fittings.
- (2) If you are manually cleaning the gun or spraying solvent into a container that can be closed, visually inspect all solvent containers at least once per month to ensure that the containers have covers and the covers fit with no visible gaps.
- (3) Keep records of the monthly inspections and any repairs that are made to the enclosed gun cleaners or 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.

(b) *Determine the volume fraction solids in aluminum recreational boat surface coatings.* To determine the volume fraction of coating solids (liters of coating solids per liter of coating) for each aluminum recreational boat surface coating, you must use one of the methods specified in paragraphs (b)(1) through (3) of this section. If the results obtained with paragraphs (b)(2) or (3) of this section do not agree with those obtained according to paragraph (b)(1) of this section, you must use the results obtained with paragraph (b)(1) of this section to determine compliance.

(1) *ASTM Method D2697–86(1998) or D6093–97.* You may use ASTM Method D2697–86(1998) or D6093–97 (available for purchase from ASTM) to determine the volume fraction of coating solids for each coating. Divide the nonvolatile volume percent obtained with the methods by 100 to calculate volume fraction of coating solids.

(2) *Information from the supplier or manufacturer of the material.* You may obtain the volume fraction of coating solids for each coating from the supplier or manufacturer.

(3) *Calculation of volume fraction of coating solids.* You may determine it using equation 1 of this section:

$$\text{Solids} = 1 - \frac{m_{\text{volatiles}}}{D_{\text{avg}}} \quad (\text{Eq. 1})$$

Where:

Solids = volume fraction of coating solids, liters coating solids per liter coating.

$m_{\text{volatiles}}$ = Total volatile matter content of the coating, including organic HAP, volatile organic compounds, water, and exempt compounds, determined according to Method 24 in appendix A of 40 CFR part 60, grams volatile matter per liter coating.

D_{avg} = average density of volatile matter in the coating, grams volatile matter per liter volatile matter, determined from test results using ASTM Method D1475–90 (available for purchase from ASTM), information from the supplier or manufacturer of the material, or reference sources providing density or specific gravity data for pure materials. If there is disagreement between ASTM Method D1475–90 test results and other information sources, the test results will take precedence.

(c) *Determine the density of each aluminum recreational boat wipedown solvent and surface coating.* Determine the density of all aluminum recreational boat wipedown solvents, surface coatings, thinners, and other additives from test results using ASTM Method D1475–90, information from the supplier or manufacturer of the material, or reference sources providing density or specific gravity data for pure materials. If there is disagreement between ASTM Method D1475–90 test results and other information

sources, you must use the test results to demonstrate 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 weight percent. For open molding production resin and tooling resin, you must also record the amounts of each applied by atomized and nonatomized methods.
 - (2) The total amount of each aluminum coating used per month (including primers, top coats, clear coats, thinners, and activators) and the weighted-average organic HAP content as determined in § 63.5752.

- (3) The total amount of each aluminum wipedown solvent used per month and the weighted-average organic HAP content as determined in § 63.5749.

§ 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.

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	1 year after becoming a major source or August 22, 2002, whichever is later

¹Your 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 3 to Subpart VVVV—MACT Model Point Value Formulas for Open Molding Operations ¹

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 · (Resin HAP%) ^{2.425}
	b. Atomized, plus vacuum bagging with roll-out	0.01185 · (Resin HAP%) ^{2.425}
	c. Atomized, plus vacuum bagging without roll-out	0.00945 · (Resin HAP%) ^{2.425}
	d. Nonatomized	0.014 · (Resin HAP%) ^{2.275}
	e. Nonatomized, plus vacuum bagging with roll-out	0.0110 · (Resin HAP%) ^{2.275}
	f. Nonatomized, plus vacuum bagging without roll-out	0.0076 · (Resin HAP%) ^{2.275}
2. Pigmented gel coat, clear gel coat, tooling gel coat	All methods.....	0.445 · (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.
21. VM & P naphtha	64742–89–8	6	3% toluene, 3% xylene.
22. Petroleum distillate mixture ...	68477–31–6	8	4% naphthalene, 4% biphenyl.

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

Part 70 Quarterly Report

Source Name: Bennington Marine, LLC
Source Address: 52791 County Road 113, Elkhart, Indiana 46514
Mailing Address: 52791 County Road 113, Elkhart, Indiana 46514
Part 70 Permit No.: NSR/TV 039-21368-00098
Facility: One (1) lamination operation, identified as LAM2
Parameter: VOC
Limit: 99.5 tons of VOC per 12 consecutive month period with compliance determined at the end of each month.

QUARTER: _____ 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. _____

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 Significant Source Modification
to a Part 70 Source

Source Description and Location

Source Name: Bennington Marine, LLC
Source Location: 52791 County Road 113, Elkhart, Indiana 46514
County: Elkhart
SIC Code: 3732
Significant Source Modification No.: 039-23730-00098
Significant Permit Modification No.: 039-23817-00098
Permit Reviewer: Aida De Guzman

Existing Approvals

The source was issued Part 70 Operating Permit No. 030-21368-00098 on December 27, 2005, and has not since been issued any other types of permit.

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM2.5	Attainment
PM/PM10	Attainment
SO ₂	Attainment
NO ₂	Attainment
8-hour Ozone	Nonattainment
CO	Attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) 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_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as nonattainment for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.
- (b) Elkhart County has been classified as unclassifiable or attainment for PM2.5. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM 2.5 emissions. Therefore, until the U.S.EPA adopts specific provisions for PSD review for PM2.5 emissions, it has directed states to regulate PM10 emissions as a surrogate for PM2.5 emissions.
- (c) Elkhart County has been classified as attainment or unclassifiable for all the other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Source Status

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:

Pollutant	Emissions (tons/year)
PM	7.46
PM10	7.66
SO ₂	0.02
VOC	99.5
CO	2.84
NO _x	3.38

- (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 not a major stationary source, under 326 IAC 2-3, Emission Offset because no regulated pollutant is emitted at a rate of 100 tons per year or more.

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)
Single HAP	87.8
Combined HAPs	99.5

- (a) 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 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).

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2002 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	0.0
PM10	0.0
SO ₂	0.0
VOC	2.0
CO	0.0
NO _x	0.0
HAP	0.0

Description of Proposed Modification

The Office of Air Quality (OAQ) has reviewed a source modification application from Bennington Marine, LLC relating to the construction and operation of the following emissions units used in the manufacture of fiberglass recreational boat hulls and decks:

- (a) One (1) lamination layup operation, identified as LAM2, equipped with eight (8) Fluid Impingement Technology (FIT) production chop guns, and one (1) FIT gun used as a backup, with a total maximum capacity of 2 units per hour; and
- (b) One (1) acetone recycling unit.

Enforcement Issues

There are no pending enforcement actions related to this modification.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
LAM1	Lamination	39' 10"	2.4	16,000	77 (ambient)
LAM2	Lamination	39" 10"	2.4	16,000	77 (ambient)
LAM3	Lamination	39" 10"	2.4	16,000	77 (ambient)
LAM4	Lamination	39" 10"	2.4	16,000	77 (ambient)
LAM5	Lamination	39" 10"	2.4	16,000	77 (ambient)
LAM6	Lamination	39" 10"	2.4	16,000	77 (ambient)
LAM7	Lamination	39" 10"	2.2	16,000	77 (ambient)
LAM8	Lamination	39" 10"	2.4	16,000	77 (ambient)

Emission Calculations

See Appendix A of this document for detailed emission calculations.

Permit Level Determination – Part 70 Modification

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	53.36
PM10	53.36
SO ₂	0.0
VOC	285.63
CO	0.0
NO _x	0.0

HAPs	Potential To Emit (tons/year)
Styrene	277.63
Worst Single HAP	277.63
Combined HAPs	277.63

This source modification is subject to 326 IAC 2-7-10.5(f)(4), significant source modification because it has a VOC potential emissions of 25 tons per year or more. Additionally, the modification will be incorporated into the Part 70 Operating Permit through a significant permit modification issued pursuant to 326 IAC 2-7-12(d), since the modification involves adding new permit terms or conditions in the Part 70 permit.

Permit Level Determination – PSD and Emission Offset

The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of this Part 70 source 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/year)						
	PM	PM10	SO ₂	VOC	CO	NO _x	(Other) Styrene
PTE from Modification (New Lamination Operation (LAM2))	2.9	2.9	-	99.5	-	-	99.5
Emission Offset Major Source Threshold				100		100	-
PSD Major Source Threshold	250	250	250		250		-

Existing Source PTE	7.46	7.66	0.02	99.5	2.84	3.38	99.5
Sourcewide PTE after Issuance of Modification	10.36	10.56	0.02	199.0	2.84	3.38	199.0

Source wide PTE After issuance of Modification = Existing source wide PTE + PTE from the modification

- (a) This modification to an existing minor stationary source is not major for PM, PM10, SO₂, and CO because the emissions increases are each less than the PSD major source threshold of 250 tons per year. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.
- (b) This modification to an existing minor stationary source is not major because the emissions increase for VOC and NO_x are each less than the Emission Offset major source threshold of 100 tons per year. Therefore, pursuant to 326 IAC 2-3, the Emission Offset requirements do not apply.

Federal Rule Applicability

- (a) Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60):
 There are no New Source Performance Standards (NSPS) included in this permit.
- (b) National Emission Standards for Hazardous Air Pollutants (NESHAP) 326 IAC 20, (40 CFR 63:
 - (1) 40 CFR Part 63.5680, Subpart VVVV – National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing:

The source became a major source of HAPs upon the issuance of the Part 70 Permit 039-21268-00098, on December 27, 2005. The source has a compliance date of one (1) year after becoming a major source for HAPs.

The new lamination operation (LAM2) is subject to this NESHAP and must comply with the following requirements of NESHAP 40 CFR Part 63.5680, Subpart VVVV:

- 40 CFR § 63.5680
- 40 CFR § 63.5683
- 40 CFR § 63.5689
- 40 CFR § 63.5692
- 40 CFR § 63.5695
- 40 CFR § 63.5698 through 40 CFR § 63.5710
- 40 CFR § 63.5731 through 40 CFR § 63.5737
- 40 CFR § 63.5740
- 40 CFR § 63.5743 through 40 CFR § 63.5755
- 40 CFR § 63.5758
- 40 CFR § 63.5761 through 40 CFR § 63.5770

(c) 40 CFR Part 64, Compliance Assurance Monitoring
 CAM requirements are applicable to a specific emission unit based on each individual pollutant, where the unit meets all of the following criteria:

- (1) The emission unit must be located at a major source for which a Part 70 permit is required.
- (2) Be subject to an emission limitation or standard.
- (3) Use a control device to achieve compliance.
- (4) Have potential pre-control emissions of at least 100 percent of the major source thresholds.

The following table is used to identify the applicability of each of the applicability criteria, under 40 CFR 64.1, to the new emission unit involved:

Emission Unit	Control Device Used	Emission Limitation (Y/N)	Uncontrolled PTE (tons/year)	Controlled/Limited PTE (tons/year)	Major Source Threshold (tons/year)	CAM Applicable (Y/N)	Large Unit (Y/N)
New LAM2	None	Y	285.63 VOC	99.5 limit	100	N	N
	None	Y	277.86 styrene	99.5 limit	10 single & 25 combined	N	Y

Based on this evaluation, the requirements of 40 CFR Part 64, CAM are not applicable to the new lamination operation (LAM2).

Applicability – Entire Source

(a) 326 IAC 2-2 (Prevention of Significant Deterioration)
 The modification is not subject to 326 IAC 2-2 (PSD), because PM, PM10, SO2, and CO are not individually emitted at a rate of 250 tons per year or greater, and the source is not one of the twenty-eight (28) listed source categories.

- (b) 326 IAC 2-3 (Emission Offset Rules)
 - (1) The modification is not subject to 326 IAC 2-3, Emission Offset rules requirements, because the source requested a VOC limit for the new lamination (LAM2) operation to below 100 tons per year.
 - (2) The modification is not subject to 326 IAC 2-3, Emission Offset rule requirements, because NOx is not emitted at a rate of 100 tons per year or greater.
- (c) 326 IAC 5-1 (Opacity Limitations)
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in the permit:
 - (1) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability – Individual Facilities

- (a) 326 IAC 8-1-6 (New Facilities; General Reduction Requirements)
The proposed lamination (LAM2) operation is not subject to 326 IAC 8-1-6, because it is regulated under 326 IAC 20-48.
- (b) 326 IAC 2-4.1-1 (New Source Toxic Control)
The new lamination (LAM2) operation is not subject to this rule as it is subject to the NESHAP for Boat manufacturing, 40 CFR Part 63, Subpart VVVV, and 326 IAC 20-48.
- (c) 326 IAC 20-48 (Emission Standards for Hazardous Air Pollutants for Boat Manufacturing).
 - (1) 326 IAC 20-48-2 (Alternative Organic Hazardous Air Pollutant Content Requirements for Open Molding Gel Coat Operations): This section of the rule does not apply to the new lamination (LAM2) operation because no gel coat will be used by this process.
 - (2) 326 IAC 20-48-3 (Work Practices Standards): The following work practices are required for the fiberglass lamination layup 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.

- (d) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
The new lamination (LAM2) operation shall be controlled by dry filters, and shall be operated in accordance with the manufacturer's specification.

Changes to the Part 70

The changes listed below have been made to Part 70 Operating Permit No. 039-21368-00098. Deleted language appears as ~~strikethroughs~~ and new language appears in **bold**:

- (1) *All references to IDEM, OAQ's mailing address have been revised as follows:*

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

- (2) *All references to the IDEM, OAQ, Compliance Section telephone number have been revised as follows: ~~317-233-5674~~ **317-233-0178**.*

- (3) *All references to the IDEM, OAQ, Compliance Section facsimile number have been revised as follows: ~~317-233-5967~~ **317-233-6865**.*

- (4) *IDEM has determined that the Permittee is not required to keep records of all preventive maintenance. However, 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 Provision condition as follows:*

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

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) 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 control devices;
- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

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

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

- ~~(b)~~ The Permittee shall implement the PMPs, including any required record keeping as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.
- ~~(e)~~ **(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, 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 PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- ~~(d)~~ **(c)** To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

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

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, and Northern Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or

Telephone Number: 317-233-5674 **0178** (ask for Compliance Section)

Facsimile Number: 317-233-5967 **6865** or

Telephone Number: 1-800-753-5519 (ask for Northern Regional Office)

Facsimile Number: 219-245-4877

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

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

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

The notice fulfills the requirement of 326 IAC 2-7-5(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). 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)(9) be revised in response to an emergency.**
 - (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 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.
- (5) *For clarification purposes, Conditions B.17 (Permit Renewal), B.18 (Permit Amendment or Modification), and B.20 (Operational Flexibility) have been revised.*

B.17 Permit Renewal [326 IAC 2-7-3] [326 IAC 2-7-4] [326 IAC 2-7-8(e)]

- (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
Indianapolis, Indiana 46204-2251

(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.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

(a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

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

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

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]
- ~~(d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.~~

B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

- (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 preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
- (3) The changes do not result in emissions which exceed the ~~emissions allowable under~~ **limitations provided** in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

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

and

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

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

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

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

- (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). 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 is not considered an application form, report or compliance certification. Therefore, the notification 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 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.

- (6) *Condition C.6 (Operation of Equipment) has been deleted from the permit, because it duplicates the Operation of Equipment required in SECTION Ds.*

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

~~Except as otherwise provided by statute or rule, or in this permit, 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 are in operation.~~

- (7) *The statement "not federally enforceable" found in Conditions C.3 (Open Burning), C.4 (Incineration), C.5 (Fugitive Dust Emissions) has been deleted, since it is required in a permit program that is federally enforceable and approved into Indiana's SIP.*

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

~~The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.~~

~~C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]~~

~~The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.~~

~~C.5 Fugitive Dust Emissions [326 IAC 6-4]~~

~~The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.~~

- (8) *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, Response to Excursion or Exceedances and the following changes have been made to the Section C condition:

**C.15 14 Compliance Response Plan—Preparation, Implementation, Records, and Reports
Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]**

- (a) ~~The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:~~
- ~~(1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.~~
 - ~~(2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.~~
- (b) ~~For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:~~
- ~~(1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or~~
 - ~~(2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.~~
 - ~~(3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be ten (10) days or more until the unit or device will be shut down, then the Permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down. The notification shall also include the status of the applicable compliance monitoring parameter with respect to normal, and the results of the response actions taken up to the time of notification.~~
 - ~~(4) Failure to take reasonable response steps shall be considered a deviation from the permit.~~
- (c) ~~The Permittee is not required to take any further response steps for any of the following reasons:~~
- ~~(1) A false reading occurs due to the malfunction of the monitoring equipment and 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 a minor permit modification to the permit, and such request has not been denied.~~
- ~~(3) An automatic measurement was taken when the process was not operating.~~
- ~~(4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.~~
- ~~(d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.~~
- ~~(e) The Permittee shall record all instances when, in accordance with Section D, response steps are 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.~~
- ~~(f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.~~
- (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.**
- (9) *SECTION A.3 has been revised to incorporate the source modification permitted in SSM No. 039-23730-00098:*

A.3 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:

~~**Proposed Emission Units and Pollution Control Equipment**~~

- (a) Fiberglass Boat Hulls and Decks Manufacturing Plant:
 - (1) Two (2) gelcoat booths, identified as GB1 and GB2, each has a maximum capacity of 0.25 unit per hour, each booth is equipped with one (1) air-assisted airless spray gun.
 - (2) One (1) lamination layup operation, identified as LAM, equipped with two (2) Fluid Impingement Technology (FIT) application guns, each has a maximum capacity of 0.25 unit per hour.
 - (3) One (1) grinding room with two (2) booths, identified as GR1 and GR2, with a total maximum capacity of 0.50 unit per hour.
 - (4) One (1) mold preparation/repair area, identified as MPR.
 - (5) Non-atomizing urethane foam application system for boat hulls, identified as UFA with a maximum capacity of 55 pounds of foam per hour.
 - (6) Various natural gas-fired heating units (air makeup and space heaters) with a total heat input capacity of 7.7 million British thermal units per hour (mmBtu/hr).
 - (7) Two (2) polyester resin process tanks each has a capacity of 6,000 gallons.
 - (8) **One (1) lamination layup operation, identified as LAM2, equipped with eight (8) Fluid Impingement Technology (FIT) production chop guns, and one (1) FIT gun used as a backup, with a total maximum capacity of 2 units per hour.**

~~**Permitted Emission Units and Pollution Control Equipment**~~

- (b) Fiberglass Boat Assembly consisting of the following:
 - (1) Cleaning operations.
 - (2) Gluing operations.
- (c) Aluminum Pontoon Boats Manufacturing Plant:

- (1) Cleaning operations.
- (2) Water-based gluing operations.
- (3) Welding operations.
- (4) Plasma cutting operations.

SECTION D.1 FACILITY CONDITIONS

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

- (a) Fiberglass Boat Hulls and Decks Manufacturing Plant:
- (1) Two (2) gelcoat booths, identified as GB1 and GB2, each has a maximum capacity of 0.25 unit per hour, each booth is equipped with one (1) air-assisted airless spray gun.
 - (2) One (1) lamination layup operation, identified as LAM, equipped with two (2) Fluid Impingement Technology (FIT) application guns, each has a maximum capacity of 0.25 unit per hour.
 - (3) One (1) grinding room with two (2) booths, identified as GR1 and GR2, with a total maximum capacity of 0.50 unit per hour.
 - (4) One (1) mold preparation/repair area, identified as MPR.
 - (5) Non-atomizing urethane foam application system for boat hulls, identified as UFA with a maximum capacity of 55 pounds of foam per hour.
 - (6) Various natural gas-fired heating units (air makeup and space heaters) with a total heat input capacity of 7.7 million British thermal units per hour (mmBtu/hr).
 - (7) Two (2) polyester resin process tanks each has a capacity of 6,000 gallons.
 - (8) **One (1) lamination layup operation, identified as LAM2, equipped with eight (8) Fluid Impingement Technology (FIT) production chop guns, and one (1) FIT gun used as a backup, with a total maximum capacity of 2 units per hour.**

~~THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1 AND 326 IAC 2-7-10.5, WITH CONDITIONS LISTED BELOW. (The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)~~

- (10) *The BACT determined under 326 IAC 8-1-6, for the existing emission units will remain in effect. However, the revised 326 IAC 8-1-6, exempts new emission units that are regulated under 326 IAC 20-48, Emission Standards for Hazardous Air Pollutants for Boat Manufacturing. The following conditions have been revised to specify the emission units subject to 326 IAC 8-1-6, and new emission units exempted from 326 IAC 8-1-6:*

Operation Conditions

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

D.1.3 Emission Offset Minor Limit for VOC [326 IAC 2-3]

- (a) The monomer content of the resins and gelcoat used from the ~~new~~ existing emission

units used for the fiberglass boat decks and hulls manufacturing operation, including the VOC usage from clean-up solvents, as well as VOC delivered to the applicators from emission units in Section D.2, except the one (1) lamination layup operation, identified as LAM2 shall be limited such that the cumulative VOC emissions shall be limited to 99.5 tons per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance with this limit shall render 326 IAC 2-3, Emission Offset rule requirements not applicable to the new fiberglass boat decks and hulls manufacturing operation, and also makes the source remain a minor source under 326 IAC 2-3.

- (b) The monomer content of the resins and gelcoat used from the one (1) lamination layup operation, identified as LAM2, including the VOC usage from clean-up solvents shall be limited such that the VOC emissions shall be limited to 99.5 tons per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance with this limit shall render 326 IAC 2-3, Emission Offset rule requirements not applicable.**

D.1.4 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6, **Best Available Control Technology (BACT) for the new existing emission units used for the fiberglass boat decks and hulls manufacturing operation Best Available Control Technology (BACT) except the one (1) lamination layup operation, identified as LAM2 shall be the following:**

- (a) Monomer content of the resins and gelcoat used, shall be limited, such that the VOC potential emissions ~~from the the new fiberglass boat decks and hulls manufacturing operation Best Available Control Technology (BACT)~~ shall be limited to less than 91.4 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (b) Monomer content of the resins and gelcoat being used shall be limited, based upon a monthly average and using high transfer efficiency application methods as follows:

Material Type	%VOC Manomer Content Monthly Average	Application Method
Production Resin	35%	Non-atomized application
Production Gel Coat	33%	Atomized Application
Tooling Resin	39%	Non-atomized Application
Tooling Gel Coat	40%	Atomized Application

Compliance with the limitations contained in this condition may be demonstrated using monthly emission averaging within each resin or gel coat application category by the use of resins or gel coats with HAP monomer contents lower than the limits specified, and/or additional emission reduction techniques approved by IDEM, OAQ.

- (c) The Permittee shall meet the following work practices:
 - (1) Nonatomizing spray equipment shall not be operated at pressures that atomize the material during the application process.
 - (2) Solvents sprayed during cleanup and resin changes shall be directed into solvent collection containers.
 - (3) 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.

- (4) Clean-up rags with solvent shall be stored in closed containers.
- (5) Closed containers shall be used for the storage of the following:
 - (A) All production and tooling resins that contain HAPs.
 - (B) All production and tooling gel coats that contain HAPs.
 - (C) Waste resins and gel coats that contain HAPs.
 - (D) Cleaning materials, including waste cleaning materials.
 - (E) 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

- (11) *Existing Conditions D.1.5 through D.1.7 will not be affected by the new lamination operation (LAM2).*

D.1.8 Particulate Matter (PM) [326 IAC 6-3-2(e)]

The particulate matter (PM) from the grinding room, which consists of two (2) booths, identified as GR1 and GR2 shall be limited by the following:

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

$$E = 4.10 P^{0.67} \quad \text{where: } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

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

D.1.10 Particulate Matter (PM) [326 IAC 6-3-2(d)]

~~Pursuant to 326 IAC 6-3-2, the new fiberglass recreational boat hulls and decks manufacturing operation shall be controlled by dry filters, and shall be operated in accordance with the manufacturer's specification.~~

Pursuant to 326 IAC 6-3-2(d), the particulate overspray emissions from the existing two gelcoat booths, identified as GB-1 and GB-2, and two lamination layup operations, identified as LAM1 and LAM2 shall be controlled by dry filtration system and shall be in place at all times whenever the emission units being controlled are in operation.

- (11) *The following equation has been added to determine compliance with the VOC emissions limit in Condition D.1.3:*

D.1.12 VOC Emissions

Compliance with the VOC emissions limit in Condition D.1.3 shall be determined using the following equation:

$$\text{VOC Emissions (tons/month)} = ((A * B) / 2000) * \text{UEF} / 2000$$

Where: **A** = Resin or gelcoat density in pounds per gallon (lbs/gal)
B = Resin or gelcoat usage in gallons per month (gal/mo)
UEF = Unified Emission Factor for Open Molding of Composites in pounds of monomer per ton of resin (lb/ton)

- (12) *Condition D.1.12, now D.1.13 has been revised to change the referenced to a Compliance Response Plan into Response to Excursions or Exceedances. IDEM has determined that the Permittee is not required to keep records of preventive maintenance, and therefore, deleted D.1.12(c), now D.1.13(c).*

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

D.1.12~~3~~ Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the fiberglass boat decks and hulls manufacturing operations ~~stacks existing two gelcoat booths, identified as GB-1 and GB-2, and two lamination layup operations, identified as LAM1 and LAM2 stacks (GB1, GB2, and LAM1 through LAM8)~~ 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 - ~~Compliance Response Plan – Preparation, Implementation, Records, and Reports~~ **Response to Excursions or Exceedances**, shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the ~~coating~~ **fiberglass layup** emissions from the stacks 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 w~~When **there is** a noticeable change in overspray emissions, or **when** evidence of overspray emissions **is are** 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 - ~~Compliance Response Plan – Preparation, Implementation, Records, and Reports~~ **Response to Excursions or Exceedances**, shall be considered a deviation from this permit.
- (c) ~~Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.~~

D.1.13~~4~~ Visible Emissions Notations

- (a) Weekly visible emission notations of the fiberglass layup stack exhausts when atomized applicators are used shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) ~~The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an~~ **If abnormal emissions is are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances.** Failure to take response steps in accordance with Section C - ~~Compliance Response Plan - Preparation, Implementation, Records and Reports~~ **Response to Excursions or Exceedances** shall be considered a deviation from this permit.

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

D.1.14-5 Record keeping requirements [[326 IAC 2-3] [326 IAC 8-1-6] [326 IAC 20-48]

- (a) To document compliance with Conditions D.1.3, D.1.4, and D1.5 the Permittee shall maintain records that are complete and sufficient to establish compliance with the VOC/HAP monomer content limits. Records maintained shall be taken monthly. Examples of such records include but are not limited to:
 - (1) The usage by weight and monomer content of each resin and gel coat used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS), manufacturer's certified product data sheets, and calculations necessary to verify the type, amount used, and HAP content of each resin or gel coat.
 - (2) Method of application and other emission reduction techniques for each resin and gel coat used.
 - (3) Monthly calculations demonstrating compliance on an equivalent emissions mass basis if non-compliant resins or gel coats are used during that month.
- (b) To document compliance with Condition D.1.7, the Permittee shall maintain the following training records:
 - (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. Records of prior training programs and former personnel are not required to be maintained.
- (c) To document compliance with Condition D.1.12, the Permittee shall maintain a log of monthly overspray observations, daily inspections of the filters, ~~and these additional inspections prescribed by the Preventive Maintenance Plan.~~
- (d) To document compliance with Condition D.1.13, the Permittee shall maintain records of weekly visible emission notations of the fiberglass operations' stack exhaust.
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.15-6 Reporting Requirements

- (a) A ~~quarterly~~ **monthly summary of the information** ~~report~~ to document compliance with Conditions D.1.3, and D.1.4 shall be submitted **quarterly** to the address listed in Section C - General Reporting Requirements, of this permit, within thirty (30) days after the end of

the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee which uses monthly emissions shall submit a quarterly summary report and supporting calculations to document compliance with Condition D.1.5. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

Part 70 Quarterly Report

Source Name: Bennington Marine, LLC
Source Address: 52791 County Road 113, Elkhart, Indiana 46514
Mailing Address: 52791 County Road 113, Elkhart, Indiana 46514
Part 70 Permit No.: NSR/TV 039-21368-00098
Facility: **New fiberglass boat decks and hulls manufacturing operation, excluding the one (1) lamination operation, identified as LAM2**
Parameter: VOC BACT
Limit: 91.45 tons of VOC per 12 consecutive month period with compliance determined at the end of each month.

QUARTER: _____ **YEAR:** _____

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

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

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

Source Name: Bennington Marine, LLC
 Source Address: 52791 County Road 113, Elkhart, Indiana 46514
 Mailing Address: 52791 County Road 113, Elkhart, Indiana 46514
 Part 70 Permit No.: NSR/TV 039-21368-00098
 Facility: Sourcewide, **excluding the one (1) lamination operation, identified as LAM2**
 Parameter: VOC
 Limit: 99.5 tons of VOC per 12 consecutive month period with compliance determined at the end of each month.

QUARTER: _____ **YEAR:** _____

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

Note: The new fiberglass boat decks and hulls manufacturing operation is the only facility subject to 326 IAC 2-3. However, the source requested to limit the entire source to less than 100 tons per year to remain a minor source.

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

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

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

Source Name: Bennington Marine, LLC
Source Address: 52791 County Road 113, Elkhart, Indiana 46514
Mailing Address: 52791 County Road 113, Elkhart, Indiana 46514
Part 70 Permit No.: NSR/TV 039-21368-00098
Facility: One (1) lamination operation, identified as LAM2
Parameter: VOC
Limit: 99.5 tons of VOC per 12 consecutive month period with compliance determined at the end of each month.

QUARTER: _____ 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.

Conclusion

The new lamination (LAM2) operation to be used for the fiberglass recreational boat hulls and decks manufacturing operation shall be subject to the conditions of the **Significant Source Modification No. 039-23730-00098, and Significant Permit Modification No. 039-23817-00098.**

Source Name: **Bennington Marine, LLC**
 Source Address: **52791 County Road 113, Elkhart, IN 46514**
 SSM Number: **039-23730**
 Plant Number: **039-00098**
 Reviewer: **Aida De Guzman**
 Date Application Received: **10/5/2006**

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	2001 CFA Unified Emission Factor (lb/ton)	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	Transfer Efficiency
Lamination Operation (8 production FIT Chp guns & 1 FIT gun for backup)										
Resin Application										
Aropol L 63320 T-27G	9.2	32.60%	94.15	2.00	69.76	60.42	1450.19	264.66	51.14	99%
AOC H010-BCA-11 Vinyl Ester Resin	9.17	46.00%	2.91	2.00	111.00	2.96	71.09	12.97	1.26	99%
Catalyst										
Lupersol DDM-9	8.4	7.70%	1.42	2.00	NA	1.83	43.84	8.00	0.96	99%
Miscellaneous Materials										
Webbing Solution - Low Flow Coat	7.0	0.00%	0.06	2.00	NA	0.00	0.00	0.00	0.00	100%
Acetone - Cleanup Solvent -Hand Application	8.7	0.00%	1.38	2.00	NA	0.00	0.00	0.00	0.00	100%

Note: Dry filters will be used to control PM overspray emissions (99.5%)

State Potential Emissions

	65.21	1565.12	285.63	53.36
Controlled PTE			2.9	
Worst single or Total HAPs (Styrene)			277.63	

Note: The VOC from the resin materials is also styrene

METHODOLOGY

Resin materials:

PTE VOC, b/hr = density, lb/gal * gal/unit * unit/hr * ton/2000 lb *CFA, lb/ton

PTE VOC, lb/day = PTE VOC, lb/hr * 24 hrs/day

PTE VOC, tons/yr = PTE VOC, lb/hr * 8760 hrs/yr * ton/2000 lb

Particulate PTE, ton/yr = unit/hr * gal/unit * density, lb/gal * (1-wt % VOC) * (1-transfer efficiency) * 8760 hrs/yr * ton/2000 lb

Non resin and non gelcoat materials:

PTE VOC, b/hr = density, lb/gal * gal/unit * unit/hr * % VOC

PTE VOC, lb/day = PTE VOC, lb/hr * 24 hrs/day

PTE VOC, tons/yr = PTE VOC, lb/hr * 8760 hrs/yr * ton/2000 lb