



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant

DATE: July 23, 2008

RE: Jefferson Yachts / 019-25534-00105

FROM: Matthew Stuckey, Branch 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, Suite N 501E, 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.dot12/03/07



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

**Jefferson Yachts, Inc.
700 East Market Street
Jeffersonville, Indiana 47130**

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

The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

Operation Permit No.: F019-25534-00105	
Original signed by:	Issuance Date: July 23, 2008
Chrystal A. Wagner, Section Chief Permits Branch Office of Air Quality	Expiration Date: July 23, 2018

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.4 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary fiberglass boat manufacturing source.

Source Address:	700 East Market Street, Jeffersonville, Indiana 47130
Mailing Address:	P.O. Box 790, Jeffersonville, IN 47130
General Source Phone Number:	812-282-8111
SIC Code:	3732
County Location:	Clark
Source Location Status:	Nonattainment for PM2.5 standard Attainment for all other criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Part 70 Source Definition [326 IAC 2-7-1(22)]

This fiberglass boat manufacturing company consists of two (2) plants:

- (a) Plant 1, 019-00105, is located at 700 E. Market Street, Jeffersonville, IN; and
- (b) Plant 2, 019-00105, is located at America Place, Building 252, Jeffersonville, IN.

Since the two (2) plants are located on adjacent properties (separated by one and a half (1.5) miles), belong to the same industrial grouping, and are under common control of the same entity, they will be considered one (1) source.

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

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

- (a) One (1) 1808/Gelcoat Spray Gun (HVLP), identified as emission unit No. 1, constructed in June 1995, with a maximum capacity of 402 pounds per hour, using dry filters as particulate control, and exhausting to vents identified as Nos. 1-12;
- (b) one (1) 0371/FloCoater Gun, identified as emission unit No. 2, constructed in April 1998, with a maximum capacity of 402 pounds per hour, and exhausting to vents identified as Nos. 1-12;
- (c) one (1) 0637/FloCoater Gun, identified as emission unit No. 3, constructed in April 2000, with a maximum capacity of 402 pounds per hour, and exhausting to vents identified as Nos. 1-12;
- (d) solvent clean-up, using hand application method, identified as emission unit No. 4, operating since 1995, with a maximum solvent capacity of 215 pounds per hour, and exhausting inside the building;

- (e) one (1) Painting Operation consisting of two (2) Paint Sprayers (HVLP), identified as emission units Nos. 5 and 6, constructed in June 1995, with a maximum capacity of one (1) gallon per hour each (15.32 ounces per minute each), using dry filters as particulate control, and exhausting to vents identified as Nos. 13 and 14;
- (f) one (1) Varnish/Sealer spray gun, using air atomization, constructed in June 1995, with a maximum capacity of 32.8 gallons per year, using dry filters as particulate control, and exhausting to vents identified as Nos. 1-12;
- (g) one (1) Adhesive spray gun, using air atomization, constructed in June 1995, with a maximum capacity of 3.2 gallons per hour, using dry filters as particulate control, and exhausting to vents identified as Nos. 1-12;
- (h) one (1) Gelcoat Patch process, using hand application method, operating since 1995, used for minor cosmetic repairs and final finishing of small areas of exposed structural composites, and exhausting inside the building;
- (i) one (1) Putty/Bonding process, using hand application method, operating since 1995, used to accommodate minor variations in product components and structures, and exhausting inside the building; and
- (j) one (1) FloCoater Gun, identified as emission unit 3A, with a maximum capacity of 45 gallons per hour, exhausting to vents identified as Nos. 1-12.

A.4 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities:

- (a) Solvent recycling systems with batch capacity less than or equal to one hundred (100) gallons;
- (b) paved and unpaved roads and parking lots with public access [326 IAC 6-4];
- (c) one (1) 31-foot Boat Mold Set;
- (d) one (1) 35-foot Boat Mold Set; and
- (e) one (1) 41-foot Boat Mold Set.

A.5 FESOP Applicability [326 IAC 2-8-2]

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

SECTION B GENERAL CONDITIONS

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

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

B.2 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

-
- (a) This permit, F019-25534-00105, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

B.4 Enforceability [326 IAC 2-8-6]

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

B.5 Severability [326 IAC 2-8-4(4)]

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

B.6 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

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

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

-
- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

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

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an "authorized individual" of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

B.9 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than April 15 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.10 Compliance Order Issuance [326 IAC 2-8-5(b)]

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

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

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.12 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality,
Compliance Section), or
Telephone Number: 317-233-0178 (ask for Compliance Section)
Facsimile Number: 317-233-6865

- (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
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

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

The notification which shall be submitted by the Permittee does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
 - (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
 - (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
 - (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
 - (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

- (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
- (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

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

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

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

- (a) All terms and conditions of permits established prior to F019-25534-00105 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

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

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

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

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

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

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

- (b) A timely renewal application is one that is:
 - (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.18 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

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

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

Any such application shall be certified by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) through (d) without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
- (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)

77 West Jackson Boulevard
Chicago, Illinois 60604-3590

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

- (5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-8-15(b) through (d). The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-8-15(b)(2), (c)(1), and (d).

- (b) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (c) Alternative Operating Scenarios [326 IAC 2-8-15(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 2-8-4(7). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.20 Source Modification Requirement [326 IAC 2-8-11.1]

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

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

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

The application which shall be submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.24 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-8-4(1)]

C.1 Overall Source Limit [326 IAC 2-8]

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

- (a) Pursuant to 326 IAC 2-8:
- (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.
 - (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
 - (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
- (b) The potential to emit particulate matter (PM) from the entire source shall be limited to less than 250 tons per twelve (12) consecutive month period. This limitation shall make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD) not applicable.
- (c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.
- (d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

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

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may

open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

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

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

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

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

C.6 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue
MC 61-52 IGCN 1003
Indianapolis, Indiana 46204-2251

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and Renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Licensed Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos.

Testing Requirements [326 IAC 2-8-4(3)]

C.7 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

C.9 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]

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

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

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

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

C.10 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60, Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

C.11 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]

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

Corrective Actions and Response Steps [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]

C.12 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

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

C.13 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]

- (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; and/or
 - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall maintain the following records:
 - (1) monitoring data;
 - (2) monitor performance data, if applicable; and
 - (3) corrective actions taken.

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

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

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

C.15 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

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

C.16 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

C.17 Compliance with 40 CFR 82 and 326 IAC 22-1

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

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

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) 1808/Gelcoat Spray Gun (HVLP), identified as emission unit No. 1, constructed in June 1995, with a maximum capacity of 402 pounds per hour, using dry filters as particulate control, and exhausting to vents identified as Nos. 1-12;
- (b) one (1) 0371/FloCoater Gun, identified as emission unit No. 2, constructed in April 1998, with a maximum capacity of 402 pounds per hour, and exhausting to vents identified as Nos. 1-12;
- (c) one (1) 0637/FloCoater Gun, identified as emission unit No. 3, constructed in April 2000, with a maximum capacity of 402 pounds per hour, and exhausting to vents identified as Nos. 1-12;
- (d) one (1) FloCoater Gun, identified as emission unit 3A, with a maximum capacity of 45 gallons per hour, exhausting to vents identified as Nos. 1-12;
- (e) solvent clean-up, using hand application method, identified as emission unit No. 4, operating since 1995, with a maximum solvent capacity of 215 pounds per hour, and exhausting inside the building;
- (f) one (1) Painting Operation consisting of two (2) Paint Sprayers (HVLP), identified as emission units Nos. 5 and 6, constructed in June 1995, with a maximum capacity of one (1) gallon per hour each (15.32 ounces per minute each), using dry filters as particulate control, and exhausting to vents identified as Nos. 13 and 14;
- (g) one (1) Varnish/Sealer spray gun, using air atomization, constructed in June 1995, with a maximum capacity of 32.8 gallons per year, using dry filters as particulate control, and exhausting to vents identified as Nos. 1-12;
- (h) one (1) Adhesive spray gun, using air atomization, constructed in June 1995, with a maximum capacity of 3.2 gallons per hour, using dry filters as particulate control, and exhausting to vents identified as Nos. 1-12;
- (i) one (1) Gelcoat Patch process, using hand application method, operating since 1995, used for minor cosmetic repairs and final finishing of small areas of exposed structural composites, and exhausting inside the building; and
- (j) one (1) Putty/Bonding process, using hand application method, operating since 1995, used to accommodate minor variations in product components and structures, and exhausting inside the building.

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

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 Prevention of Significant Deterioration (PSD) [326 IAC 2-2]

The controlled potential to emit for PM from the Gelcoat Spray Gun, identified as EU-1, the Painting Operation, containing units EU-5 and EU-6, the Varnish/Sealer spray gun, and the Adhesive spray gun shall be limited to less than a total of 250 tons per twelve (12) consecutive month period. This limit is required to limit the source-wide potential to emit of PM to less than

250 tons per twelve (12) consecutive month period.

- (a) To comply with this limit, the source shall maintain the use of dry particulate filters for each of the Gelcoat Spray Gun, identified as EU-1, the Painting Operation, containing units EU-5 and EU-6, the Varnish/Sealer spray gun, and the Adhesive spray gun. The filters shall have a minimum control efficiency of 80%, and shall be in use at all times the above emission units are in operation.

D.1.2 Hazardous Air Pollutants (HAPs) [326 IAC 2-4.1] [326 IAC 2-8]

The use of resins, gelcoats, and all other solvents used from the gelcoat spray gun and the three (3) FloCoater guns, the painting operation, varnish/sealer spray gun, adhesive spray gun, solvent cleanup, putty/bonding process, and gelcoat patch process shall be limited such that the potential to emit (PTE) of a single HAP shall be less than ten (10) tons per twelve (12) consecutive month period where compliance is determined at the end of each month and the potential to emit (PTE) of combined HAPs shall be less than twenty-five (25) tons per twelve (12) consecutive month period where compliance is determined at the end of each month. These limits are required to render the requirements of 326 IAC 2-7 (Part 70) and 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants) not applicable.

D.1.3 Particulate Matter Less than Ten Microns (PM₁₀) and Particulate Matter Less than Two and Five Tenths Microns (PM_{2.5}) [326 IAC 2-8]

- (a) The controlled potential to emit for PM₁₀ from the Gelcoat Spray Gun, identified as EU-1, the Painting Operation, containing units EU-5 and EU-6, the Varnish/Sealer spray gun, and the Adhesive spray gun shall be limited to less than a total of 100 tons per twelve (12) consecutive month period. This limit is required to limit the source-wide potential to emit of PM₁₀ to less than 100 tons per twelve (12) consecutive month period, and render the requirements of 326 IAC 2-7 (Part 70) not applicable.
- (b) The controlled potential to emit for PM_{2.5}, using PM₁₀ as an equivalent, from the Gelcoat Spray Gun, identified as EU-1, the Painting Operation, containing units EU-5 and EU-6, the Varnish/Sealer spray gun, and the Adhesive spray gun shall be limited to less than a total of 100 tons per twelve (12) consecutive month period. This limit is required to limit the source-wide potential to emit of PM_{2.5} to less than 100 tons per twelve (12) consecutive month period, and render the requirements of 326 IAC 2-1.1-5 (Non-Attainment New Source Review) not applicable.
 - (1) To comply with these limits, the source shall maintain the use of dry particulate filters for each of the Gelcoat Spray Gun, identified as EU-1, the Painting Operation, containing units EU-5 and EU-6, the Varnish/Sealer spray gun, and the Adhesive spray gun. The filters shall have a minimum control efficiency of 80%, and shall be in use at all times the above emission units are in operation.

D.1.4 Volatile Organic Compounds (VOC) [326 IAC 2-8]

The use of gelcoats, resins, paints, varnishes, adhesives, putties, and solvents, including clean-up solvents, shall be limited such that the sourcewide potential to emit of VOC shall be less than 100 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. This limit is required to limit the source-wide potential to emit of VOC to less than 100 tons per twelve (12) consecutive month period, and render the requirements of 326 IAC 2-7 (Part 70) not applicable.

D.1.5 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

- (a) The input of VOC to the Gelcoat spray gun, identified as EU-1, shall be limited such that the emissions of VOC are less than twenty-five (25) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

- (b) The input of VOC to the three (3) Flocoater guns, identified as EU-2, 3, and 3A, shall be limited such that the total emissions of VOC from these facilities are less than twenty-five (25) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with these limits will render the requirements of 326 IAC 8-1-6 (BACT) not applicable.

D.1.6 Particulate Matter (PM) [326 IAC 6.5-1]

Pursuant to 326 IAC 6.5-1-2, the particulate matter emitted from each facility at the source shall not exceed 0.03 grains per dry standard cubic foot (dscf).

- (a) To comply with this limit, the source shall maintain the use of dry particulate filters for each of the Gelcoat Spray Gun, identified as EU-1, the Painting Operation, containing units EU-5 and EU-6, the Varnish/Sealer spray gun, and the Adhesive spray gun. The filters shall have a minimum control efficiency of 80%, and shall be in use at all times the above emission units are in operation.

D.1.7 Volatile Organic Compounds (VOC) [326 IAC 8-7]

The input of VOC to the surface coating facility (the Painting Operation, consisting of units EU-5 and EU-6), the Varnish/Sealer spray gun, and the Adhesive spray gun shall each be limited to less than ten (10) tons per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance with this limit shall render the requirements of 326 IAC 8-7 not applicable.

D.1.8 Preventive Maintenance Plan [326 IAC 1-6-3]

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

Compliance Determination Requirements

D.1.9 Volatile Organic Compounds (VOC)

- (a) VOC emissions from gel coats and resins shall be calculated by multiplying the usage of each gelcoat and resin by the emission factor provided by the "Unified Emission Factors for Open Molding of Composites," Composites Fabricators Association, July 23, 2001, or its updates in conjunction with the following equation:

$$E = \sum_{i=1}^{i=n} ((A_i \times B_i) \div 2000) \times (UEF_i \div 2000)$$

Where:

E = VOC emissions (tons/month)

n = number of coatings used during the day

A_i = density (lb/gal resin or gel)

B_i = gallons of resin or gel used per month

UEF_i = Unified Emission Factor for Open Molding of Composites (lb monomer/ton resin or gel)

i = type of resin or gel

2000 = conversion factor (lbs/ton)

Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA-approved form, emission factors shall be taken from the following reference approved by IDEM, OAQ: "Unified Emission Factors for Open Molding of Composites," Composites Fabricators Association, July 23, 2001 addendum. For the purposes of these emissions calculations, monomer in resins and gel coats that is

not styrene shall be considered styrene on an equivalent weight basis.

- (b) Compliance with the non-monomer VOC usage limitations shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

D.1.10 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity, and particle loading of the dry particulate filters. To monitor the performance of the dry particulate filters, weekly observations shall be made of the overspray from the vents for the Gelcoat spray gun, identified as EU-1 while this facility is in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the particulate emissions from the vents and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

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

D.1.11 Record Keeping Requirement

- (a) To document compliance with Conditions D.1.2, D.1.4, D.1.5, and D.1.7, the Permittee shall maintain the following records in accordance with (1) through (9) below. Records maintained for (1) through (9) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.1.2, D.1.4, D.1.5, and D.1.7.

Coating Material and Solvent Use other than monomer-based gel coats and resins

- (1) The amount and VOC content by weight of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
- (2) A log of the dates of use;
- (3) The cleanup solvent usage for each month;
- (4) The total VOC usage for each month; and
- (5) The weight of VOC emitted for each compliance period.

Monomer-based gel coats and resins

- (6) The amount 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;
 - (7) A log of the dates of use;
 - (8) Method of application and other emission reduction techniques for each resin and gel coat used; and
 - (9) Monthly calculations demonstrating the weight of the VOC emitted for each compliance period.
- (c) To document compliance with Condition D.1.10, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements of this permit.

D.1.12 Reporting Requirement

A quarterly summary of the information to document compliance with Conditions D.1.2, D.1.4, D.1.5, and D.1.7 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter period 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).

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

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

Source Name: Jefferson Yachts, Inc.
Source Address: 700 East Market Street, Jeffersonville, Indiana 47130
Mailing Address: P.O. Box 790, Jeffersonville, IN 47130
FESOP Permit No.: F019-25534-00105

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

- Annual Compliance Certification Letter
- Test Result (specify)_____
- Report (specify)_____
- Notification (specify)_____
- Affidavit (specify)_____
- Other (specify)_____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
Phone: 317-233-0178
Fax: 317-233-6865**

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

Source Name: Jefferson Yachts, Inc.
Source Address: 700 East Market Street, Jeffersonville, Indiana 47130
Mailing Address: P.O. Box 790, Jeffersonville, IN 47130
FESOP Permit No.: F019-25534-00105

This form consists of 2 pages

Page 1 of 2

- | |
|---|
| <input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12) <ul style="list-style-type: none">• The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and• The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16 |
|---|

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

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

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

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

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

FESOP Quarterly Report

Source Name: Jefferson Yachts, Inc.
Source Address: 700 East Market Street, Jeffersonville, Indiana 47130
Mailing Address: P.O. Box 790, Jeffersonville, IN 47130
FESOP Permit No.: F019-25534-00105
Facility: One (1) Gelcoat gun, identified as EU-1
Parameter: VOC Input
Limit: Less than twenty-five (25) tons per year per twelve (12) consecutive month period

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**

FESOP Quarterly Report

Source Name: Jefferson Yachts, Inc.
Source Address: 700 East Market Street, Jeffersonville, Indiana 47130
Mailing Address: P.O. Box 790, Jeffersonville, IN 47130
FESOP Permit No.: F019-25534-00105
Facility: Three (3) Flocoater guns, identified as EU-2, EU-3, and EU-3A
Parameter: VOC Input
Limit: Less than twenty-five (25) tons per year per twelve (12) consecutive month period, total

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**

FESOP Quarterly Report

Source Name: Jefferson Yachts, Inc.
Source Address: 700 East Market Street, Jeffersonville, Indiana 47130
Mailing Address: P.O. Box 790, Jeffersonville, IN 47130
FESOP Permit No.: F019-25534-00105
Facility: One (1) Painting Operation, consisting of units EU-5 and EU-6
Parameter: VOC Input
Limit: Less than ten (10) tons per twelve (12) consecutive month period

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**

FESOP Quarterly Report

Source Name: Jefferson Yachts, Inc.
Source Address: 700 East Market Street, Jeffersonville, Indiana 47130
Mailing Address: P.O. Box 790, Jeffersonville, IN 47130
FESOP Permit No.: F019-25534-00105
Facility: One (1) Varnish/Sealer spray gun
Parameter: VOC Input
Limit: Less than ten (10) tons per twelve (12) consecutive month period

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**

FESOP Quarterly Report

Source Name: Jefferson Yachts, Inc.
Source Address: 700 East Market Street, Jeffersonville, Indiana 47130
Mailing Address: P.O. Box 790, Jeffersonville, IN 47130
FESOP Permit No.: F019-25534-00105
Facility: One (1) Adhesive spray gun
Parameter: VOC Input
Limit: Less than ten (10) tons per twelve (12) consecutive month period

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**

FESOP Quarterly Report

Source Name: Jefferson Yachts, Inc.
Source Address: 700 East Market Street, Jeffersonville, Indiana 47130
Mailing Address: P.O. Box 790, Jeffersonville, IN 47130
FESOP Permit No.: F019-25534-00105
Facility: One (1) Gelcoat Spray Gun, identified as EU-1, three (3) FloCoater guns, identified as EU-2, EU-3, and EU-3A, one (1) Painting Operations, consisting of units EU-5 and EU-6, Varnish/Sealer Spray Gun, Adhesive Spray Gun, Solvent Clean-up, Putty/Bonding Process, Gelcoat Patch Process
Parameter: VOC Emissions
Limit: Less than 100 tons per twelve (12) consecutive month period, total

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

FESOP Quarterly Report

Source Name: Jefferson Yachts, Inc.
 Source Address: 700 East Market Street, Jeffersonville, Indiana 47130
 Mailing Address: P.O. Box 790, Jeffersonville, IN 47130
 FESOP Permit No.: F019-25534-00105
 Facility: One (1) Gelcoat Spray Gun, identified as EU-1, three (3) FloCoater guns, identified as EU-2, EU-3, and EU-3A, one (1) Painting Operations, consisting of units EU-5 and EU-6, Varnish/Sealer Spray Gun, Adhesive Spray Gun, Solvent Clean-up, Putty/Bonding Process, Gelcoat Patch Process
 Parameter: HAP Emissions
 Limit: Less than ten (10) tons of a single HAP and less than twenty-five (25) tons of a combination of HAPs per twelve (12) consecutive month period, total

YEAR: _____

Combination of HAPs: Less than twenty-five (25) tons per twelve (12) consecutive month period

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

Single HAP: Less than ten (10) tons per twelve (12) consecutive month period

HAP Name: Styrene and Methyl Methacrylate

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

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

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

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE DATA SECTION
 FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
 QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Jefferson Yachts, Inc.
 Source Address: 700 East Market Street, Jeffersonville, Indiana 47130
 Mailing Address: P.O. Box 790, Jeffersonville, IN 47130
 FESOP Permit No.: F019-25534-00105

Months: _____ **to** _____ **Year:** _____

<p>This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked No deviations occurred this reporting period.</p>	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Quality

Addendum to the Technical Support Document for a Federally Enforceable State Operating Permit (FESOP) Renewal

Source Name: Jefferson Yachts, Inc.
Source Location: 700 East Market Street, Jeffersonville, Indiana 47130
County: Clark
SIC Code: 3732
Operation Permit No.: F019-25534-00105
Permit Reviewer: Stephanie Wilkerson

On June 17, 2008, the Office of Air Quality (OAQ) had a notice published in the Clark County Evening News in Jeffersonville, Indiana, stating that Jeffersonville Yachts, Inc. had applied for a FESOP renewal for a stationary fiberglass boat manufacturing facility. The notice also stated that OAQ proposed to issue a permit renewal for this operation and provided information on how the public could review the proposed permit renewal and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit renewal should be issued as proposed.

OAQ Changes:

On May 8th, 2008, U.S. EPA promulgated specific New Source Review rules for PM_{2.5} emissions, and the effective date of these rules was July 15th, 2008. Therefore, direct PM_{2.5} and SO₂ emissions were reviewed pursuant to the requirements of Nonattainment New Source Review, 326 IAC 2-1.1-5. For the purposes of this permit, PM₁₀ is equivalent to PM_{2.5}.

A condition limiting the emissions of PM_{2.5} will be added to Condition D.1.3 (326 IAC 2-8) of the permit to render the requirements of 326 IAC 2-1.1-5 not applicable to the source.

Changes to the permit are noted as follows: ~~struck~~ language has been deleted; **bold** language has been added. The Table of Contents has been modified to reflect these changes. No changes will be made to the TSD; rather all changes to the TSD will be documented in this Addendum.

...

D.1.3 Particulate Matter Less than Ten Microns (PM₁₀) **and Particulate Matter Less than Two and Five Tenths Microns (PM_{2.5})** [326 IAC 2-8]

-
- (a) The controlled potential to emit for PM₁₀ from the Gelcoat Spray Gun, identified as EU-1, the Painting Operation, containing units EU-5 and EU-6, the Varnish/Sealer spray gun, and the Adhesive spray gun shall be limited to less than a total of 100 tons per twelve (12) consecutive month period. This limit is required to limit the source-wide potential to emit of PM₁₀ to less than 100 tons per twelve (12) consecutive month period, and render the requirements of 326 IAC 2-7 (Part 70) not applicable.
- (b) **The controlled potential to emit for PM_{2.5}, using PM₁₀ as an equivalent, from the Gelcoat Spray Gun, identified as EU-1, the Painting Operation,**

containing units EU-5 and EU-6, the Varnish/Sealer spray gun, and the Adhesive spray gun shall be limited to less than a total of 100 tons per twelve (12) consecutive month period. This limit is required to limit the source-wide potential to emit of PM_{2.5} to less than 100 tons per twelve (12) consecutive month period, and render the requirements of 326 IAC 2-1.1-5 (Non-Attainment New Source Review) not applicable.

- (1) To comply with ~~this~~ **these** limits, the source shall maintain the use of dry particulate filters for each of the Gelcoat Spray Gun, identified as EU-1, the Painting Operation, containing units EU-5 and EU-6, the Varnish/Sealer spray gun, and the Adhesive spray gun. The filters shall have a minimum control efficiency of 80%, and shall be in use at all times the above emission units are in operation.

Indiana Department of Environmental Management
Office of Air Quality

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

Source Background and Description

Source Name:	Jefferson Yachts, Inc.
Source Location:	700 East Market Street, Jeffersonville, Indiana 47130
County:	Clark
SIC Code:	3732
Permit Renewal No.:	F019-25534-00105
Permit Reviewer:	Stephanie Wilkerson

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Jefferson Yachts, Inc., relating to the operation of a stationary fiberglass boat manufacturing source.

History

On November 14, 2007, Jefferson Yachts, Inc. submitted an application to the OAQ requesting to renew its operating permit. Jefferson Yachts, Inc. was issued its first Federally Enforceable State Operating Permit (FESOP) on April 22, 2003.

Source Definition

This Source Definition from FESOP 019-12625-00105 was incorporated into this permit as follows:

This fiberglass boat manufacturing company consists of two (2) plants:

- (a) Plant 1, 019-00105, is located at 700 E. Market Street, Jeffersonville, IN; and
- (b) Plant 2, 019-00105, is located at America Place, Building 252, Jeffersonville, IN.

Since the two (2) plants are located on adjacent properties (separated by one and a half (1.5) miles), belong to the same industrial grouping, and are under common control of the same entity, they will be considered one (1) source.

Permitted Emission Units and Pollution Control Equipment

- (a) One (1) 1808/Gelcoat Spray Gun (HVLG), identified as emission unit No. 1, constructed in June 1995, with a maximum capacity of 402 pounds per hour, using dry filters as particulate control, and exhausting to vents identified as Nos. 1-12;
- (b) one (1) 0371/FloCoater Gun, identified as emission unit No. 2, constructed in April 1998, with a maximum capacity of 402 pounds per hour, and exhausting to vents identified as Nos. 1-12;
- (c) one (1) 0637/FloCoater Gun, identified as emission unit No. 3, constructed in April 2000, with a maximum capacity of 402 pounds per hour, and exhausting to vents identified as Nos. 1-12;

- (d) solvent clean-up, using hand application method, identified as emission unit No. 4, operating since 1995, with a maximum solvent capacity of 215 pounds per hour, and exhausting inside the building;
- (e) one (1) Painting Operation consisting of two (2) Paint Sprayers (HVLV), identified as emission units Nos. 5 and 6, constructed in June 1995, with a maximum capacity of one (1) gallon per hour each (15.32 ounces per minute each), using dry filters as particulate control, and exhausting to vents identified as Nos. 13 and 14;
- (f) one (1) Varnish/Sealer spray gun, using air atomization, constructed in June 1995, with a maximum capacity of 32.8 gallons per year, using dry filters as particulate control, and exhausting to vents identified as Nos. 1-12;
- (g) one (1) Adhesive spray gun, using air atomization, constructed in June 1995, with a maximum capacity of 3.2 gallons per hour, using dry filters as particulate control, and exhausting to vents identified as Nos. 1-12;
- (h) one (1) Gelcoat Patch process, using hand application method, operating since 1995, used for minor cosmetic repairs and final finishing of small areas of exposed structural composites, and exhausting inside the building;
- (i) one (1) Putty/Bonding process, using hand application method, operating since 1995, used to accommodate minor variations in product components and structures, and exhausting inside the building; and
- (j) one (1) FloCoater Gun, identified as emission unit 3A, with a maximum capacity of 45 gallons per hour, exhausting to vents identified as Nos. 1-12.

Insignificant Activities

- (a) Solvent recycling systems with batch capacity less than or equal to one hundred (100) gallons;
- (b) paved and unpaved roads and parking lots with public access [326 IAC 6-4];
- (c) one (1) 31-foot Boat Mold Set;
- (d) one (1) 35-foot Boat Mold Set; and
- (e) one (1) 41-foot Boat Mold Set.

Existing Approvals

Since the issuance of FESOP 019-12625-00105 on April 22, 2003, the source has constructed or has been operating under the following approvals as well:

- (a) Significant Permit Modification No. 019-19311-00105 issued on November 18, 2004.

All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous registrations and permits are superseded by this permit.

The following terms and conditions from previous approvals have been revised in this FESOP Renewal:

- (a) 326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark, and Floyd Counties)

After reviewing the applicable requirements for this source, limitations have been put into place for the surface coating operations at the source pursuant to 326 IAC 8-7. See the State Rule Applicability - Individual Facilities section of this document.

Enforcement Issue

The source failed to submit a timely renewal application. Therefore, the Office of Enforcement has been notified and an investigation is pending. The original FESOP, F019-12625-00105, expired on April 22, 2008.

Emission Calculations

See Appendix A of this document for detailed emission calculations.

County Attainment Status

The source is located in Clark County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Attainment effective July 19, 2007, for the 8-hour ozone standard. ¹
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Not designated.

¹Attainment effective October 23, 2001, for the 1-hour ozone standard for the Louisville area, including Clark County, and is a maintenance area for the 1-hour ozone National Ambient Air Quality Standard (NAAQS) for purposes of 40 CFR Part 51, Subpart X*. The 1-hour standard was revoked effective June 15, 2005.
Basic nonattainment designation effective federally April 5, 2005, for PM_{2.5}.

- (a) Ozone Standards
- (1) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 revoking the one-hour ozone standard in Indiana.
 - (2) On September 6, 2007, the Indiana Air Pollution Control Board finalized a temporary emergency rule to re-designate Allen, Clark, Elkhart, Floyd, LaPorte, and St. Joseph Counties as attainment for the 8-hour ozone standard.
 - (3) On November 9, 2007, the Indiana Air Pollution Control Board finalized a temporary emergency rule to re-designate Boone, Hamilton, Hancock, Hendricks, Johnson, Madison, Marion, Morgan, and Shelby Counties as attainment for the 8-hour ozone standard.
 - (4) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) 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 NOx emissions are considered when evaluating the rule applicability relating to ozone. Clark County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

- (b) **PM_{2.5}**
 Clark County has been classified as nonattainment for PM_{2.5} in 70 FR 943 dated January 5, 2005. Until U.S. EPA adopts specific New Source Review rules for PM_{2.5} emissions, it has directed states to regulate PM₁₀ emissions as a surrogate for PM_{2.5} emissions pursuant to the requirements of Nonattainment New Source Review, 326 IAC 2-1.1-5.
- (c) **Other Criteria Pollutants**
 Clark County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (d) **Fugitive Emissions**
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3, fugitive emissions are not counted toward the determination of PSD and Emission Offset applicability.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Pollutant	tons/year
PM	906.67
PM ₁₀	906.67
SO ₂	0.0
VOC	1,550.04
CO	0.0
NO _x	0.0

HAPs	tons/year
Styrene	783.41
Methyl Methacrylate	250.90
Xylene	24.93
Toluene	35.50
Chromium	2.25
Lead	10.52
Formaldehyde	0.14
Glycol Ethers	204.45
Ethyl Benzene	6.32
Total	341.83

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of particulate matter (PM/PM₁₀) and volatile organic compounds (VOC) is greater than 100 tons per year. The source is subject to the provisions of 326 IAC 2-7. However, the source has agreed to limit its PM/PM₁₀ and VOC emissions to less than Title V levels, therefore the source will be issued a FESOP.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all other criteria pollutants are less than 100 tons per year.
- (c) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is greater than twenty-five (25) tons per year. However, the source

has agreed to limit its single HAP emissions and total HAP emissions below Title V levels. Therefore, the source will be issued a FESOP.

Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-7, fugitive emissions are not counted toward the determination of Part 70 applicability.

Potential to Emit After Issuance

The source has opted to remain a FESOP source. The table below summarizes the potential to emit, reflecting all limits of the emission units. Any control equipment is considered enforceable only after issuance of this FESOP and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/ Emission Unit	Potential To Emit (tons/year)						HAPs
	PM	PM ₁₀	SO ₂	VOC	CO	NO _x	
Three (3) Flocoat Guns	-	-	-	<25‡	-	-	<10 single and <25 combined
Solvent Cleanup	-	-	-	**	-	-	
One (1) Gelcoat Gun	<108.08*	<100	-	<25‡	-	-	
Painting Operation			-	<10†	-	-	
Varnish/Sealant Spray Gun			-	<10†	-	-	
Adhesive Spray Gun			-	<10†	-	-	
Gelcoat Patch Process	-	-	-	**	-	-	
Putty/Bonding Process	-	-	-	<10†	-	-	
Total Emissions	<108.08	<100	0.0	<100	0.0	0.0	<10/25

*Pursuant to 326 IAC 6.5-2(a), the particulate matter emissions for each facility are limited to less than 0.03 grains per dry standard cubic foot.

**Pursuant to 326 IAC 2-8 (FESOP), the source shall limit the total VOC to less than 100 tons per year. These facilities do not have specific emission limits other than the sourcewide 100 tons per year limit.

†The source has chosen to accept a limit of ten (10) tons per year of VOC for each of the coating facilities; therefore the requirements of 326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark, and Floyd Counties) are not applicable to these facilities.

‡The source has chosen to accept a limit of twenty-five (25) tons per year of VOC for each noted facility; therefore, the requirements of 326 IAC 8-1-6 (BACT) are not applicable to these facilities.

- (a) This existing stationary source is not major for PSD because the emissions of each criteria pollutant are less than two hundred fifty (<250) tons per year, and it is not one of the twenty-eight (28) listed source categories.
- (b) This existing stationary source is not major for Emission Offset because the emissions of PM₁₀ (as a surrogate for the nonattainment pollutant PM_{2.5}), are less than one hundred (<100) tons per year.
- (c) Fugitive Emissions
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3, fugitive emissions are not counted toward the determination of PSD and Emission Offset applicability.

Federal Rule Applicability

- (a) This source is not subject to the requirements of 40 CFR 64 (CAM). Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to each existing pollutant-specific emission unit that meets the following criteria:

- (1) has a potential to emit before controls equal to or greater than the major source threshold for the pollutant involved;
- (2) is subject to an emission limitation or standard for that pollutant; and
- (3) uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.

Because this source is limiting all emissions below major source thresholds, CAM does not apply.

- (b) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this source.
- (c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Plastic Parts and Products, Subpart PPPP, are not included in the permit for this source. The Permittee has chosen to limit HAP emissions to less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year for combined HAPs. Therefore, the requirements of 40 CFR 63, Subpart PPPP, do not apply to this source.
- (d) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Boat Manufacturing, Subpart VVVV, are not included in the permit for this source. The Permittee has chosen to limit HAP emissions to less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year for combined HAPs. Therefore, the requirements of 40 CFR 63, Subpart VVVV, do not apply to this source.
- (e) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Reinforced Plastic Composites Manufacturing, Subpart WWWW, are not included in the permit for this source. The Permittee has chosen to limit HAP emissions to less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year for combined HAPs. Therefore, the requirements of 40 CFR 63, Subpart WWWW, do not apply to this source.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

The Permittee has agreed to limit the emissions of PM, PM₁₀, and VOC to less than 250 tons per year, each, to avoid the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)).

- (a) The controlled potential to emit for PM from the Gelcoat Spray Gun, identified as EU-1, the Painting Operation, containing units EU-5 and EU-6, the Varnish/Sealer spray gun, and the Adhesive spray gun shall be limited to less than a total of 250 tons per twelve (12) consecutive month period. This limit is required to limit the source-wide potential to emit of PM to less than 250 tons per twelve (12) consecutive month period.
 - (1) To comply with this limit, the source shall maintain the use of dry particulate filters for each of the Gelcoat Spray Gun, identified as EU-1, the Painting Operation, containing units EU-5 and EU-6, the Varnish/Sealer spray gun, and the Adhesive spray gun. The filters shall have a minimum control efficiency of 80%, and shall be in use at all times the above emission units are in operation.
- (b) The source has accepted emission limitations of less than 100 tons per year for PM₁₀ and VOC pursuant to 326 IAC 2-8 (FESOP), thus rendering the requirements of 326 IAC 2-2 not applicable for those pollutants. See the discussion under 326 IAC 2-8 below.

326 IAC 2-6 (Emission Reporting)

Pursuant to 326 IAC 2-6-1, this source is not subject to this rule because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte Counties, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.

326 IAC 2-8 (FESOP)

Pursuant to this rule, the amount of PM₁₀ and VOC emitted shall each be limited to less than one hundred (100) tons per year. Therefore, the requirements of 326 IAC 2-7, do not apply.

- (a) The controlled potential to emit for PM₁₀ from the Gelcoat Spray Gun, identified as EU-1, the Painting Operation, containing units EU-5 and EU-6, the Varnish/Sealer spray gun, and the Adhesive spray gun shall be limited to less than a total of 100 tons per twelve (12) consecutive month period with compliance determined at the end of each month. This limit is required to limit the source-wide potential to emit of PM₁₀ to less than 100 tons per twelve (12) consecutive month period, and render the requirements of 326 IAC 2-7 (Part 70) not applicable.
 - (1) To comply with this limit, the source shall maintain the use of dry particulate filters for each of the Gelcoat Spray Gun, identified as EU-1, the Painting Operation, containing units EU-5 and EU-6, the Varnish/Sealer spray gun, and the Adhesive spray gun. The filters shall have a minimum control efficiency of 80%, and shall be in use at all times the above emission units are in operation.
- (b) The use of gelcoats, resins, paints, varnishes, adhesives, putties, and solvents, including clean-up solvents, shall be limited such that the sourcewide potential to emit of VOC shall be less than 100 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. This limit is required to limit the source-wide potential to emit of VOC to less than 100 tons per twelve (12) consecutive month period, and render the requirements of 326 IAC 2-7 (Part 70) not applicable.
- (c) The use of resins, gelcoats, and all other solvents used from the gelcoat spray gun and the three (3) FloCoater guns, the painting operation, varnish/sealer spray gun, adhesive spray gun, solvent cleanup, putty/bonding process, and gelcoat patch process shall be limited such that the potential to emit (PTE) of a single HAP shall be less than ten (10) tons per twelve (12) consecutive month period where compliance is determined at the end of each month and the potential to emit (PTE) of combined HAPs shall be less than twenty-five (25) tons per twelve (12) consecutive month period where compliance is determined at the end of each month. These limits are required to render the requirements of 326 IAC 2-7 (Part 70) not applicable.

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in the permit:

- (a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 6-4 (Fugitive Dust Emissions)

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 the provisions of 326 IAC 6-4 (Fugitive Dust Emissions).

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

This source is located in the nonattainment area of Clark County included in Jeffersonville Township. However, the source does not have potential fugitive particulate matter emissions of twenty-five (25) tons per year or more. Therefore, 326 IAC 6-5-1 is not applicable to this source.

326 IAC 6.5-1 (Particulate Matter Limitations except Lake County)

This source is located in Clark County and has the potential to emit greater than 100 tons per year of particulate matter. Therefore the requirements of 326 IAC 6.5-1 (Particulate Matter Limitations except Lake County) apply to this source.

- (a) Pursuant to 326 IAC 6.5-1-2, the particulate matter emitted from each facility at the source shall not exceed 0.03 grains per dry standard cubic foot (dscf).
 - (1) To comply with this limit, the source shall maintain the use of dry particulate filters for each of the Gelcoat Spray Gun, identified as EU-1, the Painting Operation, containing units EU-5 and EU-6, the Varnish/Sealer spray gun, and the Adhesive spray gun. The filters shall have a minimum control efficiency of 80%, and shall be in use at all times the above emission units are in operation.

State Rule Applicability – Individual Facilities

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

- (a) The Gelcoat spray gun, identified as EU-1, is not subject to the requirements of 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants) because this facility was constructed prior to the applicability date of July 27, 1997.
- (b) The source has chosen to limit the emissions of Hazardous Air Pollutants (HAPs) from the remaining source to less than ten (10) tons per year of a single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, this source is not a major source of HAPs, and the requirements of 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants) do not apply.

326 IAC 8-1-6 (BACT)

This source was constructed after January 1980 and has the potential to emit greater than twenty-five (25) tons per year of VOC. However, the source has requested the following limits:

- (a) The input of VOC to the Gelcoat spray gun, identified as EU-1 shall be limited such that the emissions of VOC is less than twenty-five (25) tons per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance with this limit will render the requirements of 326 IAC 8-1-6 (BACT) not applicable.
- (b) The input of VOC to the three (3) Flocoater guns, identified as EU-2, 3, and 3A, shall be limited such that the total emissions of VOC from these facilities is less than twenty-five (25) tons per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance with this limit will render the requirements of 326 IAC 8-1-6 (BACT) not applicable.
- (c) The Painting Operations, consisting of units EU-5 and EU-6, are subject to the requirements of 326 IAC 8-7(Specific VOC Reduction Requirements for Lake, Porter, Clark, and Floyd Counties). Therefore, pursuant to 326 IAC 8-1-6(1)(A), the requirements of 326 IAC 8-1-6 (BACT) do not apply to these units.

- (d) The Varnish/Sealer spray gun, the Adhesive spray gun, the Gelcoat Patch process, and the Putty/Bonding process each have uncontrolled potential VOC emissions of less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 8-1-6 (BACT) do not apply to these facilities.

326 IAC 8-2 (Surface Coating Emission Limitations)

This source performs surface coating of reinforced plastic composite boat components. This type of surface coating is not covered by any of the sections of 326 IAC 8-2; therefore, this source is not subject to those requirements.

326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark, and Floyd Counties)

This source has potential VOC emissions greater than 100 tons per year and is located in Clark County; therefore this source is subject to the requirements of 326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark, and Floyd Counties). However, the source has chosen to limit the input of VOC to the surface coating facility (the Painting Operation, consisting of units EU-5 and EU-6), the Varnish/Sealer spray gun, and the Adhesive spray gun each to less than ten (10) tons per twelve (12) consecutive month period, with compliance determined at the end of each month. Compliance with this limit shall render the requirements of 326 IAC 8-7 not applicable.

Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions; however, these provisions do not always fulfill the requirement for a continuous demonstration. When this occurs, IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

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

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

- (a) VOC emissions from gel coats and resins shall be calculated by multiplying the usage of each gelcoat and resin by the emission factor provided by the "Unified Emission Factors for Open Molding of Composites," Composites Fabricators Association, July 23, 2001, or its updates in conjunction with the following equation:

$$E = \sum_{i=1}^{i=n} ((A_i \times B_i) \div 2000) \times (UEF_i \div 2000)$$

Where:

E = VOC emissions (tons/month)

n = number of coatings used during the day

A_i = density (lb/gal resin or gel)

B_i = gallons of resin or gel used per month

UEF_i = Unified Emission Factor for Open Molding of Composites (lb monomer/ton resin or gel)
i = type of resin or gel
2000 = conversion factor (lbs/ton)

Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA-approved form, emission factors shall be taken from the following reference approved by IDEM, OAQ: "Unified Emission Factors for Open Molding of Composites," Composites Fabricators Association, July 23, 2001 addendum. For the purposes of these emissions calculations, monomer in resins and gel coats that is not styrene shall be considered styrene on an equivalent weight basis.

- (b) Compliance with the non-monomer VOC usage limitations shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

- (a) Daily inspections shall be performed to verify the placement, integrity, and particle loading of the dry particulate filters. To monitor the performance of the dry particulate filters, weekly observations shall be made of the overspray from the vents for the Gelcoat spray gun, identified as EU-1, the Painting Operations, consisting of units EU-5 and EU-6, the Varnish/Sealer spray gun, and the Adhesive spray gun while these facilities 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 particulate emissions from the vents and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

These compliance monitoring conditions are necessary because the dry particulate filters for the Gelcoat spray gun, identified as EU-1, the Painting Operations, consisting of units EU-5 and EU-6, the Varnish/Sealer spray gun, and the Adhesive spray gun must operate properly to ensure compliance with 326 IAC 6.5 (Particulate Matter Limitations Except Lake County), 326 IAC 2-2 (PSD), and 326 IAC 2-8 (FESOP).

Recommendation

The staff recommends to the Commissioner that the FESOP Renewal be approved. This recommendation is based on the following facts and conditions:

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

An application for the purposes of this review was received on November 14, 2007. Additional information was received on December 10, 2007 and February 25, 2008.

Conclusion

The operation of this stationary fiberglass manufacturing source shall be subject to the conditions of the attached FESOP Renewal No. 019-25534-00105.

Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations
includes Adhesives, Putty/Bonding, and Cleanup Solvents

Company Name: Jefferson Yachts, Inc.
Address City IN Zip: 700 East Market Street, Jeffersonville, Indiana 47130
Permit Number: F019-25534-00105
Plt ID: 019-00105
Reviewer: Stephanie Wilkerson
Date: 3/24/2008

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Norox MEKP-9H	9.2	4.00%	0.0%	4.0%	0.0%	0.00%	5.00000	0.330	0.37	0.37	0.61	14.54	2.65	15.92	0.00	75%
Norox MEKP-9H Red	9.2	4.00%	0.0%	4.0%	0.0%	0.00%	5.00000	0.330	0.37	0.37	0.61	14.57	2.66	15.96	0.00	75%
Superox DDM-30 Red	8.2	3.00%	0.0%	3.0%	0.0%	0.00%	5.00000	0.330	0.25	0.25	0.40	9.71	1.77	14.33	0.00	75%
Awlcraft 2000 Clear	8.3	44.45%	0.0%	44.5%	0.0%	55.55%	5.00000	0.330	3.67	3.67	6.06	145.33	26.52	8.29	6.61	75%
Standard Reducer - Spray Applied Urethane Topcoat	7.8	100.00%	0.0%	100.0%	0.0%	0.00%	5.00000	0.330	7.78	7.78	12.84	308.18	56.24	0.00	0.00	75%
Awlcraft 2000	10.4	49.00%	0.0%	49.0%	0.0%	51.00%	5.00000	0.330	5.10	5.10	8.41	201.80	36.83	9.58	9.99	75%
545 Epoxy Primer Gray Base	12.3	50.92%	0.0%	50.9%	0.0%	49.08%	5.00000	0.330	6.25	6.25	10.32	247.57	45.18	10.89	12.74	75%
Converter for D1001 & D8001	8.1	63.22%	0.0%	63.2%	0.0%	36.78%	5.00000	0.330	5.15	5.15	8.49	203.86	37.21	5.41	14.00	75%
545 Epoxy Primer White Base	12.4	51.41%	0.0%	51.4%	0.0%	48.59%	5.00000	0.330	6.35	6.35	10.48	251.53	45.90	10.85	13.07	75%
Standard Reducer for Epoxy Primers	7.1	100.00%	0.0%	100.0%	0.0%	0.00%	5.00000	0.330	7.12	7.12	11.76	282.13	51.49	0.00	0.00	75%
Gray Duratec Surfacing Primer	10.8	32.00%	0.0%	32.0%	0.0%	68.00%	5.00000	0.330	3.44	3.44	5.68	136.35	24.88	13.22	5.06	75%
Black Hi Gloss Coating	9.0	37.20%	0.0%	37.2%	0.0%	62.80%	5.00000	0.330	3.35	3.35	5.53	132.73	24.22	10.22	5.34	75%
Super Jet Black	8.3	49.00%	0.0%	49.0%	0.0%	51.00%	5.00000	0.330	4.09	4.09	6.74	161.83	29.53	7.68	8.01	75%
Claret	9.2	45.00%	0.0%	45.0%	0.0%	55.00%	5.00000	0.330	4.13	4.13	6.81	163.52	29.84	9.12	7.51	75%
Stars & Stripes Blue	10.0	39.00%	0.0%	39.0%	0.0%	61.00%	5.00000	0.330	3.90	3.90	6.44	154.59	28.21	11.03	6.40	75%
Dark Green	9.2	46.00%	0.0%	46.0%	0.0%	54.00%	5.00000	0.330	4.22	4.22	6.96	167.15	30.50	8.95	7.82	75%
Off White	10.8	32.00%	0.0%	32.0%	0.0%	68.00%	5.00000	0.330	3.47	3.47	5.72	137.36	25.07	13.32	5.10	75%
Awl-Cat #2 Topcoat Converter	8.4	58.27%	0.0%	58.3%	0.0%	41.73%	5.00000	0.330	4.87	4.87	8.03	192.68	35.16	6.30	11.66	75%
SHER-WOOD Conversion Varnish (worst-case)	8.0	56.80%	0.0%	56.8%	0.0%	43.20%	0.37000	1.000	4.55	4.55	1.68	40.40	7.37	2.80	10.53	50%
SHER-WOOD Sealer (worst-case)	7.4	75.60%	0.0%	75.6%	0.0%	24.40%	0.37000	1.000	5.59	5.59	2.07	49.68	9.07	1.46	22.93	50%
Core-Bond B70	6.0	31.60%	0.0%	31.6%	0.0%	68.40%	32.63900	0.042	1.90	1.90	2.60	62.48	11.40	0.00	2.78	100%
Poly-Bond B46 & B56 Fiber	5.8	30.40%	0.0%	30.4%	0.0%	69.60%	32.63900	0.042	1.75	1.75	2.40	57.61	10.51	0.00	2.52	100%
BPO/5 Green	10.0	2.00%	0.0%	2.0%	0.0%	48.00%	32.63900	0.042	0.20	0.20	0.27	6.59	1.20	0.00	0.42	100%

Potential Emissions Worst case coating added to all solvents 130.92 3142.20 573.45 175.33

METHODOLOGY

Controlled PM (assuming 80% control efficiency) 35.07

- Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
- Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
- Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
- Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
- Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
- Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1-Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
- Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
- Total = Worst Coating + Sum of all solvents used

**Appendix A: Emission Calculations
HAP Emission Calculations**

Company Name: Jefferson Yachts, Inc.
Address City IN Zip: 700 East Market Street, Jeffersonville, Indiana 47130
Permit Number: F019-25534-00105
Plt ID: 019-00105
Permit Reviewer: Stephanie Wilkerson
Date: 3/24/2008

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Formaldehyde	Weight % Chromium	Weight % Lead	Weight % Styrene	Weight % Glycol Ethers	Weight % Ethyl Benzene	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Formaldehyde Emissions (ton/yr)	Chromium Emissions (ton/yr)	Lead Emissions (ton/yr)	Styrene Emissions (ton/yr)	Glycol Ethers Emissions (ton/yr)	Ethyl Benzene Emissions (tons/yr)
Awlcraft 2000 Clear	8.26	5.00	0.33	8.00%	0.00%	0.00%	0.00%	0.00%	0.00%	9.00%	1.90%	4.77	0.00	0.00	0.00	0.00	0.00	5.37	1.13
Reducer - Spray Applied Urethane Topcoat	7.78	5.00	0.33	0.00%	11.00%	0.00%	0.00%	0.00%	0.00%	53.00%	0.00%	0.00	6.19	0.00	0.00	0.00	0.00	29.81	0.00
Awlcraft 2000	10.40	5.00	0.33	9.00%	6.00%	0.00%	3.00%	14.00%	0.00%	23.00%		6.76	4.51	0.00	2.25	10.52	0.00	17.29	0.00
545 Epoxy Primer Gray Base	12.28	5.00	0.33	1.00%	0.00%	0.00%	0.00%	0.00%	0.00%	3.00%	0.33%	0.89	0.00	0.00	0.00	0.00	0.00	2.66	0.29
Converter for D1001 & D8001	8.14	5.00	0.33	0.00%	12.00%	0.00%	0.00%	0.00%	0.00%	15.00%	0.00%	0.00	7.06	0.00	0.00	0.00	0.00	8.83	0.00
545 Epoxy Primer White Base	12.35	5.00	0.33	1.00%	0.00%	0.00%	0.00%	0.00%	0.00%	3.00%	0.33%	0.89	0.00	0.00	0.00	0.00	0.00	2.68	0.29
Standard Reducer for Epoxy Primers	7.12	5.00	0.33	0.00%	20.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	10.30	0.00	0.00	0.00	0.00	0.00	0.00
Gray Duratec Surfacing Primer	10.76	5.00	0.33	0.10%	0.00%	0.00%	0.00%	0.00%	20.50%	0.00%	0.00%	0.08	0.00	0.00	0.00	0.00	15.94	0.00	0.00
Black Hi Gloss	9.01	5.00	0.33	0.20%	0.00%	0.00%	0.00%	0.00%	30.50%	0.00%	0.00%	0.13	0.00	0.00	0.00	0.00	19.86	0.00	0.00
Super Jet Black Claret	8.34	5.00	0.33	5.00%	0.00%	0.00%	0.00%	0.00%	0.00%	37.00%	1.50%	3.01	0.00	0.00	0.00	0.00	0.00	22.30	0.90
Claret	9.18	5.00	0.30	1.50%	0.00%	0.00%	0.00%	0.00%	0.00%	37.00%	1.00%	0.90	0.00	0.00	0.00	0.00	0.00	22.31	0.60
Stars & Stripes Blue	10.01	5.00	0.33	1.50%	0.00%	0.00%	0.00%	0.00%	0.00%	37.00%	1.00%	1.09	0.00	0.00	0.00	0.00	0.00	26.77	0.72
Dark Green	9.18	5.00	0.33	1.50%	0.00%	0.00%	0.00%	0.00%	0.00%	37.00%	1.00%	0.99	0.00	0.00	0.00	0.00	0.00	24.54	0.66
Off White	10.84	5.00	0.33	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	35.00%	1.00%	0.00	0.00	0.00	0.00	0.00	0.00	27.42	0.78
Awl-Cat #2 Topcoat Converter	8.35	5.00	0.33	3.00%	10.00%	0.00%	0.00%	0.00%	0.00%	24.00%	0.67%	1.81	6.03	0.00	0.00	0.00	0.00	14.48	0.40
WOOD Conversion Varnish (worst-case)	8.01	0.37	1.00	24.00%	9.00%	0.70%	0.00%	0.00%	0.00%	0.00%	4.00%	3.12	1.17	0.09	0.00	0.00	0.00	0.00	0.52
WOOD Sealer (worst-case)	7.40	0.37	1.00	4.00%	2.00%	0.40%	0.00%	0.00%	0.00%	0.00%	0.00%	0.48	0.24	0.05	0.00	0.00	0.00	0.00	0.00
Core-Bond B70	6.01	32.64	0.04	0.00%	0.00%	0.00%	0.00%	0.00%	31.60%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	11.40	0.00	0.00
Poly-Bond B46 & B56 Fiber	5.76	32.64	0.04	0.00%	0.00%	0.00%	0.00%	0.00%	30.40%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	10.51	0.00	0.00

Potential Emissions 24.93 35.50 0.14 2.25 10.52 57.72 204.45 6.32

METHODOLOGY **Total HAPs 341.83 ton/yr**

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

**Appendix A: Emissions Calculations
Form DD: Reinforced Plastics and Composites
Open Molding Operations*
Resin and Gel Usage**

**Company Name: Jefferson Yachts, Inc.
Address City IN Zip: 700 East Market Street, Jeffersonville, Indiana 47130
Permit: F019-25534-00105
Plt ID: 019-00105
Reviewer: Stephanie Wilkerson
Date: 3/24/2008**

Emission Unit ID	Material (Resin or Gel Name)	Density (Lb/Gal)	Weight % Monomer	Maximum usage (gal/hour)	UEF (lbs monomer/ton resin or gel)	Potential VOC/HAP (pounds per day)	Potential VOC/HAP (tons per year)	Transfer Efficiency	Potential PM (tons/ year)
Gelcoat Gun (EU-1)	Polycor White - Styrene	10.7	31.01%	37.570	201.57	972.63	177.50	80%	243.00
	Polycor White - MMA	10.7	4.75%	37.570	75	361.80	66.03		
	Polycor Orange - Styrene	9.1	41.96%	44.180	350.4	1690.58	308.53	80%	204.42
	Polycor Orange - MMA	9.1	4.60%	44.180	75	361.85	66.04		
	ArmorFlex White - Styrene	11.2	19.37%	35.750	125.91	607.32	110.84	80%	283.92
	ArmorFlex White - MMA	11.2	8.50%	35.750	135	651.17	118.84		
Flocoat Gun (EU-2, EU-3, EU3A)	Stypol LSPA - Styrene	8.9	34.01%	45.070	74.03	357.14	65.18	100%	0.00
	Stypol VSXH - Styrene	9.2	32.84%	43.650	70.28	339.07	61.88	100%	0.00
Gelcoat Patch	Poly-Bond B39 - Styrene	9.0	24.40%	0.379	61.49	2.52	0.46	100%	0.00
	Patchaid - Styrene	8.8	50.45%	0.370	182.77	7.11	1.30	100%	0.00
Total VOC/HAP and PM from Resin and Gel Use							976.59		731.34

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

Controlled PM
(assuming 80%
control efficiency) 146.2688

METHODOLOGY

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

Use the emission factors based on the type of application from "Unified Emission Factors for Open Molding of Composites," Composites Fabricators Association (July 23, 2001) to calculate and gelcoat emissions.

UEF: The United Emission Factor is the emission factor for the resin or gel styrene content that can be determined using the UEF Table. An interpolation calculator is provided on the table for those styrene contents between the values given in the table that are not integers. Use the extrapolation equations given in the table for styrene contents that are less than or greater than the range of factors given in the table.

Potential VOC (lb/day) for resins or gels = Density (lb material /gal material) * Gal. of material (gal material/unit) * Maximum usage (unit/hr) * UEF (lb styrene/ton material) * 24 hrs/day

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

Potential PM (ton/year) = Density * (1 - Weight % monomer or VOC) * Gal. of Material * Maximum Usage * (1 - transfer efficiency) * 24 hrs/day * 365 days/year * (1 ton/2000 lb)