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: April 3, 2008

RE: Smoker Craft, Inc. / 039-26115-00073

FROM: Matthew Stuckey, Branch Chief
Permits Branch
Office of Air Quality

Notice of Decision – Approval

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

If you wish to challenge this decision, IC 4-21.5-3-7 requires that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) calendar days from the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures
FNPER-AM.dot12/3/07

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
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Mitchell E. Daniels, Jr.
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Thomas W. Easterly
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Mr. Joel Bechtold
Smoker Craft, Inc.
68143 Clunette Street
P.O. Box 65
New Paris, IN 46553

April 3, 2008

Re: **039-26115-00073**
Second Administrative Amendment to
Part 70 T039-18527-00073

Dear Mr. Bechtold:

Smoker Craft, Inc. was issued a permit on January 18, 2005 for a stationary fiberglass and aluminum boat manufacturing plant. A letter requesting the addition of new emission units was received on February 19, 2008. Pursuant to the provisions of 2-7-11 the permit is hereby administratively amended as per the attached Technical Support Document.

All other conditions of the permit shall remain unchanged and in effect. Please find the entire amended document attached to this letter.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact John Haney, at (800) 451-6027, and ask for John Haney or extension 4-5328, or dial (317) 234-5328.

Sincerely,

Original signed by
Donald F. Robin, P.E., Section Chief
Permits Branch
Office of Air Quality

Attachments
DFR/jeh
cc: File - Elkhart County
U.S. EPA, Region V
Elkhart County Health Department
Northern Regional Office
Air Compliance Section Inspector
Compliance Data Section
Administrative and Development

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PART 70 OPERATING PERMIT RENEWAL
OFFICE OF AIR QUALITY

Smoker Craft, Inc.
68143 Clunette Street
New Paris, Indiana 46553

(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. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. 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 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T039-18527-00073	
Original Signed by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: January 18, 2005 Expiration Date: January 18, 2010

First Administrative Amendment No. 039-23194-00073 issued on August 30, 2006.

Second Administrative Amendment: 039-26115-00073	
Issued by: *Original signed by* Donald F. Robin, P.E., Section Chief Permits Branch Office of Air Quality	Issuance Date: April 3, 2008 Expiration Date: January 18, 2010

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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.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

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

The Permittee owns and operates a stationary fiberglass and aluminum boat manufacturing plant.

Source Address:	68143 Clunette Street, New Paris, Indiana 46553
Mailing Address:	68143 Clunette Street, P.O. Box 65, New Paris, Indiana 46553
General Source Phone Number:	(574) 831-7053
SIC Code:	3732
County Location:	Elkhart
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD Minor Source, under Emission Offset Rules Major Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

(a) Eight (8) glue/adhesive spray booths, identified as 3-1GA, 3-2GA, 3-3(a)GA, 3-3(b)GA, 3-4GA, 3-5GA, 23-1GA, each exhausting through Stack 23-1 and 7-1GA exhausting through Stack 7-1, each using air-assisted airless spray guns, with emissions controlled by baffles. Booths 3-4GA, 3-5GA and 7-1GA were constructed in 1993, 1996 and 1988, respectively. Booths 3-1GA, 3-2GA, 3-3(a)GA, 3-3(b)GA and 23-1GA were constructed prior to 1980.

(b) Nine (9) glue stations, identified as 3-6GS, 5-1GS, 5-2GS, 5-3GS, 5-4GS, 5-5GS, 14-1GS, 23-2GS, 25-6GS, using manual application methods and air-assisted airless spray guns at low pressure resulting in no formation of airborne particulate, with no control equipment, with emissions exhausting inside the building and then to general ventilation. Booths 3-6GS and 25-6GS were constructed in 1993 and 1992, respectively. Booths 5-1GS, 5-2GS, 5-3GS, 5-4GS, 5-5GS, 14-1GS and 23-2GS were constructed prior to 1980.

(c) Five (5) paint booths using air-assisted airless spray guns, identified as 6-1PB, 6-2PB, 13-1PB, 13-2PB and 13-3PB, all constructed prior to 1980, with emissions controlled by dry filters and exhausting through stacks 6-1, 6-2, 13-1, 13-2, and 13-3.

(d) One (1) paint booth for aluminum boat repair/touch-up, using atomized spray application methods, identified as 25-3PB, constructed prior to 1980, with emissions controlled by dry filters and exhausting through stack 25-3.

(e) Six (6) catalyst/fiber resin chop guns using non-atomized (fluid impingement) application methods, identified as 24-2RC, 24-3RC, 24-4RC, 24-6RC (formerly 25-3RC), 24-7RC (formerly 25-4RC) and 24-8RC (formerly 25-5RC), all constructed prior to 1980, with emissions collectively controlled by four (4) exhaust systems using dry filters and exhausting through stacks 24-2, 24-3, 24-4 and 24-5.

(f) One (1) catalyst/fiber resin chop gun/application area using non-atomized (fluid impingement) application methods, identified as 25-1RC, constructed prior to 1980, with emissions exhausting inside the building and then to general ventilation.

(g) Two (2) gel coat booths using air-assisted airless spray guns, identified as 24-1GC and 25-1GC, both constructed prior to 1980, with emissions controlled by dry filters and exhausting through stacks 24-1 and 25-1, respectively.

(h) One (1) dip tank coating booth, identified as 13-4DT, constructed prior to 1980, with no control equipment. Emissions exhaust inside the building and then to general ventilation.

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

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

(a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-3-2]

(b) The following equipment related to manufacturing activities not resulting in the emission of HAPs, consisting of thirty-seven (37) welding machines, with emissions controlled by electrostatic precipitators, exhausting inside the building and then to general ventilation. Twenty (20) machines are located in building #3, and seventeen (17) machines are located in building #27. [326 IAC 6-3]

(c) Structural steel and bridge fabrication activities using 80 tons or less of welding consumables. [326 IAC 6-3]

(d) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]

(e) Two (2) fiberglass grinding and cutting operations, identified as 24-5FG and 25-7FG, controlled with fabric filters, canister filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute. Emissions from 24-5FG and 25-7FG are controlled by canister filter and dry filter and exhaust through stacks 24-5 and 25-7FG, respectively. [326 IAC 6-3]

(f) Two (2) touch-up of gelcoat/final finish operations including cleaning, polishing and waxing operations, identified as 23-3TU and 24-9TU, located in buildings 23 and 24, and touch-up of paint operations, identified as 1-1TU, located in building 1, with no emission controls and complying with the definition of insignificant activities in IAC 326 2-7-1(21) (B) and (C). [326 IAC 6-3]

(g) Three (3) insignificant woodworking operations, meeting the definition of insignificant woodworking operation pursuant to 326 IAC 2-7-1(21)(G)(xxx), identified as 9-1W, 24-1W and 28-1W, with emissions controlled by cyclones and return air bagfilter collection systems and exhausting inside the building and then to general ventilation.

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

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

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

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

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, 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 2-7-5(2)] [326 IAC 2-1.1-9.5] [326 IAC 2-7-4(a)(1)(D)] [IC 13-15-3-6(a)]

(a) This permit, (T039-18527-00073) is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

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

B.3 Terms 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 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 2-7-7]

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 Termination of Right to Operate [326 IAC 2-7-3] [326 IAC 2-7-4(a)]

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

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

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

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

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

B.8 Duty to Provide Information [326 IAC 2-7-5(6)(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 the “responsible official” as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.

(b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.9 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

(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 a responsible official 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) A responsible official is defined at 326 IAC 2-7-1(34).

B.10 Annual Compliance Certification [326 IAC 2-7-6(5)]

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

and

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

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

(c) The annual compliance certification report shall include the following:

(1) The 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 2-7-5(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 the "responsible official" as defined by 326 IAC 2-7-1(34).

B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall 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) The Permittee shall implement the PMPs, including any required record keeping as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.

(c) 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 PMP does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

(d) 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 2-7-16]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, and Northern Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

IDEM Main Office
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

Northern Regional Office
Telephone Number: 1-800-753-5519
Telephone Number: 574-245-4870
Facsimile Number: 574-245-4877

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

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46206-6015

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

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

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

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

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

(g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

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

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

(a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a

determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

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

(b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

(c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

(d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:

(1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

(2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and

(4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

(e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

(f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]

(g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.14 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions permits established prior to T039-18527-00073 and issued pursuant to permitting programs approved into the state implementation plan have been either

(1) incorporated as originally stated,

(2) revised under 326 IAC 2-7-10.5, or

(3) deleted under 326 IAC 2-7-10.5

(b) All previous registrations and permits are superseded.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46206-6015

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 the "responsible official" as defined by 326 IAC 2-7-1(34). 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 2-7-5(6)(C)]
[326 IAC 2-7-8(a)] [326 IAC 2-7-9]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

(c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

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

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

certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46206-6015

(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 2-7 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.

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

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

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

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46206-6015

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

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

B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

(a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

(b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

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

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;

(3) The changes do not result in emissions which exceed the emissions allowable under 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 46206-6015

and

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

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

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

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

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

(c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

(d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

(e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.21 Source Modification Requirement [326 IAC 2-7-10.5] [326 IAC 2-3-2] [326 IAC 2-2-2]

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

(b) Any modification at an existing major source is governed by the requirements of 326 IAC 2-3-2 and/or 326 IAC 2-2-2.

B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2] [IC 13-30-3-1] [IC 13-17-3-2]

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 Part 70 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 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 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 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.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46206-6015

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

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

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][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) Except as provided in 326 IAC 2-7-19(e), 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.25 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][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 has been performed.

SECTION C **SOURCE OPERATION CONDITIONS**

Entire Source

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

C.1 Particulate Emission Limitations for Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [[326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

C.2 Opacity [326 IAC 5-1]

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

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

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

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

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

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

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

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

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

Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission unit(s) vented to the control equipment are in operation.

C.7 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 46206-6015

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 the "responsible official" as defined by 326 IAC 2-7-1(34).

(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 Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

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

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

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing 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 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(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 the "responsible official" as defined by 326 IAC 2-7-1(34).

(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.9 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 2-7-5(1)] [326 IAC 2-7-6(1)]

C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(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 46206-6015

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

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

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

C.11 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.

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

C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

(a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on November 23, 1999.

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

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

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

C.14 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:

(1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.

(2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:

(1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or

(2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.

(3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be ten (10) days or more until the unit or device will be shut down, then the Permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down. The notification shall also include the status of the applicable compliance monitoring parameter with respect to normal, and the results of the response actions taken up to the time of notification.

(4) Failure to take reasonable response steps shall be considered a deviation from the permit.

(c) The Permittee is not required to take any further response steps for any of the following reasons:

(1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.

(3) An automatic measurement was taken when the process was not operating.

(4) The process has already returned or is returning to operating within “normal” parameters and no response steps are required.

(d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.

(e) The Permittee shall record all instances when, in accordance with Section D, response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

(f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate 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 and 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 the “responsible official” as defined by 326 IAC 2-7-1(34).

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

C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)] [326 IAC 2-6]

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

contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

(1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);

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

The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue
MC 61-50 IGCN 1003
Indianapolis, Indiana 46206-6015

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

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

C.17 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-2-1] [326 IAC 2-3-1]

(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.18 General Reporting Requirements [326 IAC 2-7-5(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 the "responsible official" as defined by 326 IAC 2-7-1(34).

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46206-6015

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

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

(d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

C.19 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 FACILITY OPERATION CONDITIONS

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

(a) Eight (8) glue/adhesive spray booths, identified as 3-1GA, 3-2GA, 3-3(a)GA, 3-3(b)GA, 3-4GA, 3-5GA, 23-1GA, and 7-1GA, each using air-assisted airless spray guns, with emissions controlled by baffles and exhausting through stacks 3-1, 3-2, 3-3(a), 3-3(b), 3-4, 3-5, 23-1, and 7-1, respectively. Booths 3-4GA, 3-5GA and 7-1GA were constructed in 1993, 1996 and 1988, respectively. Booths 3-1GA, 3-2GA, 3-3(a)GA, 3-3(b)GA and 23-1GA were constructed prior to 1980.

(b) Nine (9) glue stations, identified as 3-6GS, 5-1GS, 5-2GS, 5-3GS, 5-4GS, 5-5GS, 14-1GS, 23-2GS, 25-6GS, using manual application methods and air-assisted airless spray guns at low pressure resulting in no formation of airborne particulate, with no control equipment, with emissions exhausting inside the building and then to general ventilation. Booths 3-6GS and 25-6GS were constructed in 1993 and 1992, respectively. Booths 5-1GS, 5-2GS, 5-3GS, 5-4GS, 5-5GS, 14-1GS and 23-2GS were constructed prior to 1980.

(c) Five (5) paint booths using air-assisted airless spray guns, identified as 6-1PB, 6-2PB, 13-1PB, 13-2PB and 13-3PB, all constructed prior to 1980, with emissions controlled by dry filters and exhausting through stacks 6-1, 6-2, 13-1, 13-2, 13-3 and 25-3, respectively.

(d) One (1) paint booth for aluminum boat repair/touch-up, using atomized spray application methods, identified as 25-3PB, constructed prior to 1980, with emissions controlled by dry filters and exhausting through stack 25-3.

(h) One (1) dip tank coating booth, identified as 13-4DT, constructed prior to 1980, with no control equipment. Emissions exhaust inside the building and then to general ventilation.

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

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

D.1.1 PSD Minor Limit [326 IAC 2-2]

Pursuant to Operating Permit 039-7570-00073, issued on August 25, 1999, the use of VOC from the entire source, including resins, gel coats, surface coatings, dilution solvents, cleaning solvents, and degreasing solvents shall be less than 250 tons per 12 consecutive month period, with compliance determined at the end of each month. This usage limit is required to limit the potential to emit of VOC to less than 250 tons per 12 consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable to the emission units constructed in 1998, 1992, 1993, and 1996.

D.1.2 Volatile Organic Compounds [326 IAC 8-1-6]

(a) Pursuant to Operating Permit T039-7570-00073, issued August 28, 1999, the VOC input to each of the three (3) glue/adhesive spray booths (3-4GA, 3-5GA and 7-1GA) shall be limited to less than 25 tons per 12 consecutive month period, with compliance determined at the end of each month. Therefore, the requirements of 326 IAC 8-1-6 (General Reduction Requirements) shall not apply to these emission units.

(b) Pursuant to Operating Permit T039-7570-00073, issued August 28, 1999, the VOC input to each of the two (2) glue stations (3-6GS, 25-6GS) shall be limited to less than 25 tons per 12 consecutive month period, with compliance determined at the end of each month. Therefore, the requirements of 326 IAC 8-1-6 (General Reduction Requirements) shall not apply to these emission units.

D.1.3 Particulate Matter (PM) [40 CFR 52 Subpart P]

Pursuant to Operating Permit T039-7570-00073, issued on August 25, 1999 and 40 CFR 52, Subpart P, the particulate matter (PM) from the glue/adhesive spray booths (3-1GA, 3-2GA, 3-3(a)GA, 3-3(b)GA, 3-4GA, 3-5GA, 23-1GA, and 7-1GA) and the paint booths (6-1PB, 6-2PB, 13-1PB, 13-2PB, 13-3PB, and 25-3PB) shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

D.1.4 Particulate [326 IAC 6-3-2(d)]

(a) Pursuant to 326 IAC 6-3-2(d), particulate from the glue/adhesive spray booths (3-1GA, 3-2GA, 3-3(a)GA, 3-3(b)GA, 3-4GA, 3-5GA, 23-1GA, and 7-1GA) shall be controlled by baffles, and the Permittee shall operate the control devices in accordance with manufacturer's specifications. This requirement to operate the control is not federally enforceable.

(b) Pursuant to 326 IAC 6-3-2(d), particulate from the paint booths (6-1PB, 6-2PB, 13-1PB, 13-2PB, 13-3PB, and 25-3PB) shall be controlled by dry filters, and the Permittee shall operate the control devices in accordance with manufacturer's specifications. This requirement to operate the control is not federally enforceable.

D.1.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

D.1.6 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

Compliance with the VOC content and usage limitations contained in Conditions D.1.1 and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) 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 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.7 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the baffles controlling the glue/adhesive spray booths (3-1GA, 3-2GA, 3-3(a)GA, 3-3(b)GA, 3-4GA, 3-5GA, 23-1GA, and 7-1GA). To monitor the performance of the baffles, weekly inspections of the baffle panels shall be conducted to verify placement and configuration meet recommendations of the manufacturer. In addition, weekly observations shall be made of the overspray from the glue/adhesive spray booth stacks (3-1, 3-2, 3-3(a), 3-3(b), 3-4, 3-5, 23-1, and 7-1) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

(b) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters controlling the paint booths (6-1PB, 6-2PB, 13-1PB, 13-2PB, 13-3PB and 25-3PB). To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (6-1, 6-2, 13-1, 13-2, 13-3 and 25-3) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure

to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

(c) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for these units shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

(d) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

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

D.1.8 Record Keeping Requirements

(a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) 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.1.1 and D.1.2. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

(1) The amount and VOC content of each coating material, adhesive, dilution solvent and cleanup solvent less water used on a monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(2) The total VOC usage for each month; and

(3) The weight of VOCs emitted for each compliance period.

(b) To document compliance with Conditions D.1.5 and D.1.7, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

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

D.1.9 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1 and D.1.2 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

SECTION D.2 FACILITY OPERATION CONDITIONS

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

(e) Six (6) catalyst/fiber resin chop guns using non-atomized (fluid impingement) application methods, identified as 24-2RC, 24-3RC, 24-4RC, 24-6RC (formerly 25-3RC), 24-7RC (formerly 25-4RC) and 24-8RC (formerly 25-5RC), all constructed prior to 1980, with emissions collectively controlled by four (4) exhaust systems using dry filters and exhausting through stacks 24-2, 24-3, 24-4 and 24-5.

(f) One (1) catalyst/fiber resin chop gun/application area using non-atomized (fluid impingement) application methods, identified as 25-1RC, constructed prior to 1980, with emissions exhausting inside the building and then to general ventilation.

(g) Two (2) gel coat booths using air-assisted airless spray guns, identified as 24-1GC and 25-1GC, both constructed prior to 1980, with emissions controlled by dry filters and exhausting through stacks 24-1 and 25-1, respectively.

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

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

D.2.1 PSD Minor Limit [326 IAC 2-2]

Pursuant to Operating Permit 039-7570-00073, issued on August 25, 1999, the use of VOC from the entire source, including resins, gel coats, dilution solvents, cleaning solvents, and degreasing solvents shall be less than 250 tons per 12 consecutive month period, with compliance determined at the end of each month. This usage limit is required to limit the potential to emit of VOC to less than 250 tons per 12 consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable to the emission units constructed in 1988, 1992, 1993, and 1996.

D.2.2 Particulate Matter (PM) [40 CFR 52, Subpart P]

Pursuant to 40 CFR 52, Subpart P, the particulate matter (PM) emissions from the catalyst/fiber resin chop guns (24-2RC, 24-3RC, 24-4RC, 24-6RC, 24-7RC, 24-8RC, and 25-1RC) and the gelcoat booths (24-1GC and 25-1GC) shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

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

Pursuant to 326 IAC 6-3-2(d), particulate emissions from the catalyst/fiber resin chop guns (24-2RC, 24-3RC, 24-4RC, 24-6RC, 24-7RC and 24-8RC) and the gelcoat booths (24-1GC and 25-1GC) shall be controlled by dry particulate filters, and the Permittee shall operate the control devices in accordance with manufacturer's specifications.

D.2.4 General Provisions Relating to NESHAP [326 IAC 20-48-1] [40 CFR 63, Subpart A]

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

D.2.5 Emissions Standards for Fiberglass Boat Manufacturing Facilities [40 CFR 63.5698] [40 CFR 63.5740]

Pursuant to 40 CFR 63.5698 and 40 CFR 63.5740, the Permittee shall limit HAP emissions from its open molding operations and its carpet and fabric adhesive operations as follows:

(a) Organic HAP emissions from the five (5) open molding operations specified in paragraph (b) below shall not exceed the limit calculated using the following equation:

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

Where:

HAP limit	=	Total allowable organic HAP (in kilograms) that can be emitted from the open molding operations.
M_R	=	Mass of production resin (in megagrams) used in the past 12 months, excluding any exempt materials.
M_{PG}	=	Mass of pigmented gel coat (in megagrams) used in the past 12 months, excluding any exempt materials.
M_{CG}	=	Mass of clear gel coat (in megagrams) used in the past 12 months, excluding any exempt materials.
M_{TR}	=	Mass of tooling resin (in megagrams) used in the past 12 months, excluding any exempt materials.
M_{TG}	=	Mass of tooling gel coat (in megagrams) used in the past 12 months, excluding any exempt materials.

(b) Organic HAP emissions from the following five (5) open molding operations shall be limited to the limit specified in paragraph (a):

(1) Production resin;

(2) Pigmented gel coat;

(3) Clear gel coat;

(4) Tooling resin; and

(5) Tooling gel coat.

(c) Organic HAP emissions from the following materials are exempt from the open molding emission limit specified in paragraph (a):

(1) Production resins (including skin coat resins) that must meet specifications for use in military vessels or must be approved by the U.S. Coast Guard for use in the construction of lifeboats, rescue boats, and other life-saving appliances approved under 46 CFR Subchapter Q or the construction of small passenger vessels regulated by 46 CFR Subchapter T. Production resins for which this exemption is used must be applied with nonatomizing (non-spray) resin application equipment.

(2) Pigmented, clear, and tooling gel coat used for part or mold repair and touch up. The total gel coat materials included in this exemption must not exceed 1 percent by weight of all gel coat used at the Permittee's facility on a 12-month rolling-average basis.

(3) Pure, 100 percent vinylester resin used for skin coats. This exemption does not apply to blends of vinylester and polyester resins used for skin coats. The total resin materials included in the exemption cannot exceed 5 percent by weight of all resin used at the Permittee's facility on a 12-month rolling-average basis.

(4) Records must be kept to verify amounts of all exempt materials used on a per month basis.

(d) The Permittee shall use carpet and fabric adhesives that contain no more than 5 percent organic HAP by weight.

(e) Pursuant to 40 CFR 63.5704(b), the Permittee shall demonstrate that emissions from the open molding resin and gel coat operations meet the emission limit specified in Condition D.2.5(a) by using the compliant materials methods specified in Condition D.2.15. The Permittee shall use the methods specified in Condition D.2.14(a) to determine the organic HAP content of resins and gel coats. The Permittee shall complete the calculations described in Condition D.2.15 to show that the organic HAP emissions do not exceed the limit specified in Condition D.2.5(a). Compliance with these requirements shall be based on a 12-month rolling average.

D.2.6 Emission Standards for Aluminum Recreational Boat Surface Coating Operations [40 CFR 63.5743]

Pursuant to 40 CFR 63.5743, the Permittee shall meet the emissions standards for its aluminum wipedown solvent operations and aluminum recreational boat surface coating operations by complying with either the separate emission limits in 40 CFR 63.5743(a)(1) and 40 CFR 63.5731(a)(2) (specified in paragraph (a) below), or the combined emission limit in 40 CFR 63.5743(a)(3) (specified in paragraph (b) below). Compliance with these limitations is based on a 12-month rolling average that is calculated at the end of every month.

(a) Pursuant to 40 CFR 63.5743(a)(1), the Permittee shall limit emissions from aluminum wipedown solvents to no more than 0.33 kilograms of organic HAP per liter of total coating solids applied from aluminum primers, clear coats, and top coats combined; no limit applies when cleaning surfaces are receiving decals or adhesive graphics; and pursuant to 40 CFR 63.5743(a)(2), the Permittee shall limit emissions from aluminum recreational boat surface coatings (including thinners, activators, primers, topcoats, and clear coats) to no more than 1.22 kilograms of organic HAP per liter of total coating solids applied from aluminum primers, clear coats, and top coats combined; or

(b) Pursuant to 40 CFR 63.5743(a)(3), the Permittee shall limit emissions from the combined aluminum surface coatings and aluminum wipedown solvents to no more than 1.55 kilograms of organic HAP per liter of total coating solids applied from aluminum primers, clear coats, and top coats combined.

D.2.7 Work Practice Standards [40 CFR 63.5731] [40 CFR 63.5734]

Pursuant to 40 CFR 63.5731 and 40 CFR 63.5734, the Permittee shall meet the following work practice standards for its resin and gel coat mixing operations and its resin and gel coat application equipment cleaning operations:

(a) All resin and gel coat mixing containers with a capacity equal to or greater than 208 liters, including those used for on-site mixing of putties and polyputties, shall have a cover with no visible gaps in place at all times. This work practice standard does not apply when material is being manually added to or removed from a container, or when mixing or pumping equipment is being placed in or removed from a container.

(b) The Permittee shall demonstrate compliance with the work practice standard in paragraph (a) of this Condition by visually inspecting all mixing containers subject to this standard at least once per month. The inspection should ensure that all containers have covers with no visible gaps between the cover and the container, or between the cover and equipment passing through the cover.

(c) For routine flushing of resin and gel coat application equipment (e.g., spray guns, flowcoaters, brushes, rollers, and squeegees), the Permittee shall use a cleaning solvent that contains no more than 5 percent organic HAP by weight. For removing cured resin or gel coat from application equipment, no organic HAP content limit applies.

(d) The Permittee shall store organic HAP-containing solvents used for removing cured resin or gel coat in containers with covers. The covers shall have no visible gaps and shall be in place at all times, except when equipment to be cleaned is placed in or removed from the container. On containers with a capacity greater than 7.6 liters, the distance from the top of the container to the solvent surface must be no less than 0.75 times the diameter of the container. Containers that store organic HAP-containing solvents used for removing cured resin or gel coat are exempt from the requirements of 40 CFR 63, Subpart T. Cured resin or gel coat means resin or gel coat that has changed from a liquid to a solid.

D.2.8 Work Practice Standards for Aluminum Recreational Boat Surface Coating Operations [40 CFR 63.5743]

Pursuant to 40 CFR 63.5743, the Permittee shall comply with the work practice standards for its aluminum recreational boat surface coating operations specified in 40 CFR 63.5743(b)(1), (2), (3) or (4) when cleaning aluminum coating spray guns with solvents containing more than 5 percent organic HAP by weight by complying with the requirements specified in paragraphs (a), (b), (c) or (d) below.

(a) The Permittee shall clean spray guns in an enclosed device. The Permittee shall keep the device closed except when placing spray guns into or removing spray guns from the device; or

(b) The Permittee shall disassemble the spray gun and manually clean the components in a vat. The Permittee shall keep the vat closed when the vat is not in use; or

(c) The Permittee shall clean spray guns by placing solvent in the pressure pot and forcing the solvent through the gun. The Permittee shall not use atomizing air during this procedure. The Permittee shall direct the used cleaning solvent from the spray gun into a container that is kept closed when it is not in use; or

(d) The Permittee shall use an alternative gun cleaning process or technology approved by the Administrator according to the procedures in 40 CFR 63.6(g).

D.2.9 Emission Standards for Fiberglass Boat Manufacturing [326 IAC 20-48-2]

Pursuant to 326 IAC 20-48-2, in addition to alternative organic HAP content requirements for open molding resin operations contained in Table 2 to 40 CFR 63, Subpart VVVV, the alternative HAP content requirements for gel coat operations are as follows:

Gel Coat Application		
For this operation	And this application method	The Permittee shall not exceed this weighted-average percent organic HAP content (weight percent) requirement
Pigmented gel coat operations	Atomized (spray)	33 percent
Clear gel coat operations	Atomized (spray)	48 percent
Tooling gel coat operations	Atomized (spray)	40 percent
Pigmented gel coat operations	Nonatomized (nonspray)	40 percent
Clear gel coat operations	Nonatomized (nonspray)	55 percent
Tooling gel coat operations	Nonatomized (nonspray)	54 percent

D.2.10 Work Practice Standards for Fiberglass Boat Manufacturing [326 IAC 20-48-3]

Pursuant to 326 IAC 20-48-3, in addition to the requirements imposed by 40 CFR 63.5731 and 40 CFR 63.5734(b), the following work practice standards shall be implemented:

(a) Nonatomizing spray equipment shall not be operated at pressures that atomize the material during the application process.

(b) Solvents sprayed during cleanup and resin changes shall be directed into solvent collection containers.

(c) For routine flushing of resin and gel coat application equipment, such as spray guns, flowcoaters, brushes, rollers, and squeegees, owners or operators must use a cleaning solvent that contains no hazardous air pollutants (HAPs). However, recycled cleaning solvents that contain less than or equal to five percent (5%) HAP by weight are considered to contain no HAP for the purposes of this subdivision. For removing cured resin or gel coat from application equipment, no organic HAP limit applies.

(d) Clean-up rags with solvent shall be stored in closed containers.

(e) Closed containers shall be used for the storage of the following:

(1) All production and tooling resins that contain HAPs.

(2) All production and tooling gel coats that contain HAPs.

(3) Waste resins and gel coats that contain HAPs.

(4) Cleaning materials, including waste cleaning materials.

(5) Other materials that contain HAPs.

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

D.2.11 Operator Training for Fiberglass Boat Manufacturing [326 IAC 20-48-4]

Pursuant to 326 IAC 20-48-4, all new and existing personnel, including contract personnel, who are involved in resin and gel coat spraying and spray-like applications that could result in excess emissions if performed improperly, shall be trained according to the following schedule:

(a) All personnel hired shall be trained within fifteen (15) days of hiring.

(b) To ensure training goals listed in paragraph (d) are maintained, all personnel shall be given refresher training annually.

(c) Personnel who have been trained by another owner or operator subject to 326 IAC 20-48 are exempt from requirements of paragraph (a) if written documentation that the employee's training is current is provided to the new employer.

(d) The lesson plans shall cover, for the initial and refresher training, at a minimum, all of the following topics:

(1) Appropriate application techniques.

(2) Appropriate equipment cleaning procedures.

(3) Appropriate equipment setup and adjustment to minimize material usage and overspray.

D.2.12 Preventive Maintenance Plan [326 IAC 2-7-4(c)(9)]

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

Compliance Determination Requirements

D.2.13 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

Compliance with the VOC usage limitations contained in Condition D.2.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the

manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4

D.2.14 Determining Hazardous Air Pollutant (HAP) Content of Materials [40 CFR 63.5758]

(a) Pursuant to 40 CFR 63.5758(a), the Permittee shall determine the organic HAP content of materials used in its open molding resin and gel coat operations, carpet and fabric adhesive operations, aluminum wipedown solvents and aluminum recreational boat surface coatings using one or more of the following methods:

(1) Method 311 (Appendix A to 40 CFR 63). The Permittee may use Method 311 for determining the mass fraction of organic HAP. The Permittee shall use the procedures specified in the following two (2) paragraphs when determining organic HAP content by Method 311.

(A) Include in the organic HAP total each organic HAP that is measured to be present at 0.1 percent by mass or more for Occupational Safety and Health Administration (OSHA)-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and at 1.0 percent by mass or more for other compounds. Express the mass fraction of each organic HAP measured as a value truncated to four places after the decimal point (for example, 0.1234).

(B) Calculate the total organic HAP content in the test material by adding up the individual organic HAP contents and truncating the result to three places after the decimal point (for example, 0.123).

(2) Method 24 (Appendix A to 40 CFR Part 60) may be used to determine the mass fraction of non-aqueous volatile matter of aluminum coatings. Use that value as a substitute for mass fraction of organic HAP.

(3) ASTM D1259-85 (Standard Test Method for Nonvolatile Content of Resins) may be used to measure the mass fraction of volatile matter of resins and gel coats for open molding operations. Use that value as a substitute for mass fraction of organic HAP.

(4) By providing information on organic HAP content from information supplied by the supplier or manufacturer of the material, such as manufacturer's formulation data, according to the following three (3) paragraphs:

(A) Include in the organic HAP total each organic HAP that is present at 0.1 percent by mass or more for OSHA-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and at 1.0 percent by mass or more for other compounds.

(B) If the organic HAP content is provided by the material supplier or manufacturer as a range, then the Permittee shall use the upper limit of the range for determining compliance. If a separate measurement of the total organic HAP content using the methods specified in paragraphs (a) – (c) above exceeds the upper limit of the range of the total organic HAP content provided by the material supplier or manufacturer, then the Permittee shall use the measured organic HAP content to determine compliance.

(C) If the organic HAP content is provided as a single value, the Permittee may assume the value is a manufacturing target value and actual organic HAP content may vary from the target value. If a separate measurement of the total organic HAP content using the methods specified in paragraphs (a) – (c) is less than 2 percentage points higher than the value for total organic HAP content provided by the material supplier or

manufacturer, then the Permittee shall use the provided value to demonstrate compliance. If the measured total organic HAP content exceeds the provided value by 2 percentage points or more, then the Permittee shall use the measured organic HAP content to determine compliance.

(5) For solvent blends, the Permittee shall calculate organic HAP content using detailed information available from the supplier or manufacturer of the material or by using the values for organic HAP content listed in Table 5 or 6 of 40 CFR 63, Subpart VVVV.

(6) The Permittee may use an alternative test method for determining mass fraction of organic HAP by obtaining prior approval by the Administrator, following the procedure set forth in 40 CFR 63.7(f).

(b) Pursuant to 40 CFR 63.5758(b), the Permittee shall determine the volume fraction of coating solids (liters of coating solids per liter of coating) for each aluminum recreational boat surface coating by using one of the methods specified in 40 CFR 63.5758(b)(1) through (3) as specified in paragraphs (1) through (3) below. If the results obtained with paragraphs (2) or (3) below do not to agree with those obtained according to paragraph (1), the Permittee shall use the results obtained with 40 CRF 63.5758(b)(1) to determine compliance.

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

(2) The Permittee may obtain the volume fraction of coating solids for each coating from the supplier or manufacturer of the material.

(3) The Permittee may determine the volume fraction of coating solids by using the following equation:

$$Solids = 1 - (m_{volatiles} / D_{avg})$$

Where:

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

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

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

(c) Pursuant to 40 CFR 63.5758(c), the Permittee shall determine the density of all aluminum recreational boat wipedown solvents, surface coatings, thinners, and other additives from test results using one of the methods specified in paragraphs (1) through (3) below.

(1) ASTM Method D1475-90, or

(2) Information from the supplier or manufacturer of the material, or

(3) Reference sources providing density or specific gravity data for pure materials.

If there is disagreement between ASTM Method D1475-90 test results and other information sources, the Permittee shall use the test results to demonstrate compliance.

D.2.15 Compliance Demonstration Requirement [40 CFR 63.5713]

Pursuant to 40 CFR 63.5713, the Permittee shall demonstrate compliance with the HAP emission limits for open molding and gelcoat operations by the following:

(a) Compliance using the organic HAP content requirements listed in Table 2 of 40 CFR 63, Subpart VVVV is demonstrated on a 12-month rolling-average basis and is determined, by calculations, at the end of every month (12 times per year). The first 12-month rolling-average period begins on August 22, 2004.

(b) At the end of the twelfth month after August 22, 2004 and at the end of every subsequent month, the Permittee shall review the organic HAP content of the resins and gel coats used in the past twelve (12) months in each operation.

(1) If all resins and gel coats used in an operation have organic HAP contents no greater than the applicable organic HAP content limits in Table 2 of 40 CFR 63, Subpart VVVV, then the Permittee is in compliance with the emission limit specified in 40 CFR 63.5698 for that twelve (12) month time period for that operation.

(2) If any of the resins and/or gel coats used in any operation have organic HAP contents greater than the applicable organic HAP content limits in Table 2 of 40 CFR 63, Subpart VVVV, then the Permittee shall use the following equation to calculate the weighted-average organic HAP content for all resins and gel coats used in each operation in the past twelve months.

$$\text{Weighted-Average HAP Content (\%)} = \frac{\sum_{i=1}^{n} (M_i \, HAP_i)}{\sum_{i=1}^{n} (M_i)}$$

Where:

M_i = Mass of open molding resin or gel coat i used in the past twelve months in an operation, in megagrams.

HAP_i = Organic HAP content, by weight percent, of open molding resin or gel coat i used in the past twelve months in an operation. Use the methods in 40 CFR 63.5758 to determine the organic HAP content.

n = Number of different open molding resins or gel coats used in the past 12 months in an operation.

(c) If the weighted-average organic HAP content does not exceed the applicable organic HAP content limit specified in Table 2 of 40 CFR 63, Subpart VVVV, then the Permittee is in compliance with the emission limit specified in 40 CFR 63.5698.

D.2.16 Compliance Demonstration Requirement [40 CFR 63.5737]

Pursuant to 40 CFR 63.5737, the Permittee shall demonstrate compliance with the resin and gel coat application equipment cleaning standards specified in Condition D.2.7 by the following:

(a) The Permittee shall determine and record the organic HAP content of the cleaning solvents subject to the work practice standards specified in Condition D.2.7 using the methods specified in Condition D.2.14.

(b) If the Permittee recycles cleaning solvents on site, the Permittee shall use documentation from the solvent manufacturer or supplier or a measurement of the organic HAP content of the cleaning solvent as originally obtained from the solvent supplier for demonstrating compliance, subject to the conditions in Condition D.2.14 for demonstrating compliance with organic HAP content limits.

(c) At least once per month, the Permittee shall visually inspect any containers holding organic HAP-containing solvents used for removing cured resin and gel coat to ensure that the containers have covers with no visible gaps. The Permittee shall keep records of the monthly inspections and any repairs made to the covers.

D.2.17 Compliance Demonstration Requirement [40 CFR 63.5755]

Pursuant to 40 CFR 63.5755, the Permittee shall demonstrate compliance with the aluminum recreational boat surface coating spray gun cleaning work practice standards by complying with the requirements of 40 CFR 63.5755(a) (as specified in paragraph (a) below), or by complying with the requirements of 40 CFR 63.5755(b) (as specified in paragraph (b) below).

(a) Pursuant to 40 CFR 63.5755(a), the Permittee shall demonstrate that solvents used to clean the aluminum coating spray guns contain no more than 5 percent organic HAP by weight by determining organic HAP content with the methods specified in Condition D.2.14; or

(b) Pursuant to 40 CFR 63.5755(b), for solvents containing more than 5 percent organic HAP by weight, the Permittee shall comply with the requirements in paragraphs (1) or (2) below:

(1) If the Permittee is using an enclosed spray gun cleaner, the Permittee shall visually inspect it at least once per month to ensure that covers are in place and the covers have no visible gaps when the cleaner is not in use, and that there are no leaks from hoses or fittings; or

(2) If the Permittee is manually cleaning the gun or spraying solvent into a container that can be closed, the Permittee shall visually inspect all solvent containers at least once per month to ensure that the containers have covers and the covers fit with no visible gaps.

D.2.18 Compliance Demonstration Requirement [40 CFR 63.5746] [40 CFR 63.5753]

Pursuant to 40 CFR 63.5746 and 40 CFR 63.5753, the Permittee shall demonstrate compliance with the emission limits for aluminum wipedown solvents and aluminum recreational boat surface coatings specified in Condition D.2.6 by meeting the requirements of 40 CFR 63.5746(a) through (f) as specified in paragraphs (a) through (e) below; or, by meeting the requirements of 40 CFR 63.5753 as specified in paragraph (f) below. Compliance is based on a 12-month rolling average calculated at the end of every month. The first 12-month rolling-average period begins on August 22, 2004.

(a) The Permittee shall determine and record the organic HAP content (kilograms of organic HAP per kilogram of material, or weight fraction) of each aluminum wipedown solvent and aluminum surface coating (including primers, topcoats, clear coats, thinners, and activators). The Permittee shall use the methods specified in Condition D.2.14 to determine organic HAP content.

(b) The Permittee shall use the methods specified in Condition D.2.14(b) to determine the solids content (liters of solids per liter of coating, or volume fraction) of each aluminum surface coating, including primers, topcoats, and clear coats.

(c) The Permittee shall use the methods specified in Condition D.2.14(c) to determine the density of each aluminum surface coating and wipedown solvent.

(d) At the end of the twelfth month after August 22, 2004 and at the end of every subsequent month, the Permittee shall calculate the organic HAP content of aluminum wipedown

solvents (in kilograms of HAP per liter of coating solids) used in the past twelve months by use of the following equation:

$$HAP_{WD} = \frac{\sum_{j=1}^{n} (Vol_j)(D_j)(W_j)}{\sum_{i=1}^{n} (Vol_i)(Solids_i)}$$

Where:

HAP_{WD}	=	Weighted-average organic HAP content of aluminum wipedown solvents, kilograms of HAP per liter of total coating solids from aluminum primers, top coats, and clear coats.
n	=	Number of different wipedown solvents used in the past 12 months.
Vol_j	=	Volume of aluminum wipedown solvent j used in the past 12 months, liters.
D_j	=	Density of aluminum wipedown solvent j, kilograms per liter.
W_j	=	Mass fraction of organic HAP in aluminum wipedown solvent j.
m	=	Number of different aluminum surface coatings (primers, top coats, and clear coats) used in the past 12 months.
Vol_i	=	Volume of aluminum primer, top coat, or clear coat i used in the past 12 months, liters.
$Solids_i$	=	Solids content aluminum primer, top coat, or clear coat i, liter solids per liter of coating.

Compliance is based on a 12-month rolling average. If the weighted-average organic HAP content does not exceed 0.33 kilograms of organic HAP per liter of total coating solids, then the Permittee is in compliance with the emission limit specified in 40 CFR 63.5743(a)(1) and Condition D.2.6(a).

(e) At the end of the twelfth month after August 22, 2004 and at the end of every subsequent month, the Permittee shall calculate the weighted-average organic HAP content of all aluminum surface coatings (in kilograms of HAP per liter of coating solids) used in the past twelve months by using the following equation:

$$HAP_{SC} = \frac{\sum_{i=1}^{m} (Vol_i)(D_i)(W_i) \quad \sum_{k=1}^{D} (Vol_k)(D_k)(W_k)}{\sum_{i=1}^{m} (Vol_i)(Solids_i)}$$

Where:

HAP_{SC}	=	Weighted-average organic HAP content for all aluminum surface coating materials, kilograms of organic HAP per liter of coating solids.
m	=	Number of different aluminum primers, top coats, and clear coats used in the past 12 months.
Vol_i	=	Volume of aluminum primer, top coat, or clear coat i used in the past 12 months, liters.
D_i	=	Density of coating i, kilograms per liter.
W_i	=	Mass fraction of organic HAP in coating i, kilograms of organic HAP per kilogram of coating.
p	=	Number of different thinners, activators, and other coating additives used in the past 12 months.
Vol_k	=	Total volume of thinner, activator, or additive k used in the past 12 months, liters.

D_k = Density of thinner, activator, or additive k, kilograms per liter.
W_k = Mass fraction of organic HAP in thinner, activator, or additive k, kilograms of organic HAP per kilogram of thinner or activator.
$Solids_i$ = Solids content of aluminum primer, top coat, or clear coat i, liter solids per liter of coating.

Compliance is based on a 12-month rolling average. If the weighted-average organic HAP content does not exceed 1.22 kilograms of organic HAP per liter of coating solids, then the Permittee is in compliance with the emission limit specified in 40 CFR 63.5743(a)(2) and Condition D.2.6(a).

(f) Pursuant to 40 CFR 63.5753, the Permittee shall use the following equation to calculate the combined weighted-average organic HAP content of aluminum wipedown solvents and aluminum recreational boat surface coatings:

$$HAP_{Combined} = HAP_{WD} + HAP_{SC}$$

Where:

HAP_{WD} = Weighted-average organic HAP content of aluminum wipedown solvents used in the past twelve months, calculated using equation 1 of 40 CFR 63.5749.

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

Compliance is based on a 12-month rolling average. If the combined organic HAP content does not exceed 1.55 kilograms of organic HAP per liter of total coating solids, then the Permittee is in compliance with the emission limit specified in 40 CFR 63.5743(a)(3) and Condition D.2.6(b).

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

D.2.19 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the stacks (24-1, 24-2, 24-3, 24-4, 24-5 and 25-1) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a deviation from this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan – Preparation, Implementation, Records, and Reports shall be considered a deviation from this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

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

D.2.20 Record Keeping Requirements

(a) To document compliance with Condition D.2.2, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be

taken monthly and shall be complete and sufficient to establish compliance with the VOC allowable usage level established in Condition D.2.2.

(1) The amount and VOC content of each gelcoat, resin, aluminum wipedown solvent, aluminum surface coating, dilution solvent and cleaning solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used;

(2) The total VOC usage for each month; and

(3) The weight of VOCs emitted for each compliance period.

(b) To document compliance with Conditions D.2.12 and D.2.19, the Permittee shall maintain a log of daily filter inspections, weekly overspray observations, monthly emissions and overspray inspections, and those additional inspections prescribed by the Preventative Maintenance Plan.

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

D.2.21 Record Keeping Requirements

(a) Pursuant to 326 IAC 20-48-4, and in order to comply with Condition D.2.11, the Permittee shall maintain the following training records on site and available for inspection and review:

(1) A copy of the current training program.

(2) A list of all current personnel, by name, that are required to be trained and the dates they were trained and the date of the most recent refresher training.

Records of prior training programs and former personnel are not required to be maintained.

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

D.2.22 Record Keeping Requirements for Fiberglass Boat Manufacturing Facilities [40 CFR 63.5767]

(a) Pursuant to 40 CFR 63.5698(d), the Permittee shall keep records of the amounts of materials exempt from the open molding emissions limits used on a per month basis per Condition D.2.5(c)

(b) Pursuant to 40 CFR 63. 5740(b), the Permittee shall keep records of the amount and HAP content of all carpet and fabric adhesives used by the source. HAP content shall be calculated using any of the methods specified in Condition D.2.14.

(c) Pursuant to 40 CFR 63.5731(d), and in order to demonstrate compliance with Condition D.2.7, the Permittee shall keep records of the monthly visual inspections of the gelcoat and resin mixing containers and any repairs made to the covers.

(d) Pursuant to 40 CFR 63.5737, and in order to demonstrate compliance with Condition D.2.7 and Condition D.2.16, the Permittee shall keep records of the monthly visual inspections of the containers used to store solvent used for removing cured resin and gelcoat from the application equipment and any repairs made to the covers.

(e) Pursuant to 40 CFR 63.5704(b), and in order to demonstrate compliance with Condition D.2.5(a) and Condition D.2.15, the Permittee shall keep the following records for each resin and gel coat used in the gelcoat and open molding operations:

(1) Hazardous air pollutant content.

(2) Amount of material used per month. This record is not required if all materials used for that operation comply with the organic HAP content requirements specified in Table 2 of 40 CFR 63, Subpart VVVV.

(3) Application method used for production resin and tooling resin. This record is not required if all production resins and tooling resins are applied with non-atomized technology.

(4) Calculations performed, if required, to demonstrate compliance based on weighted-average organic HAP content, as described in 40 CFR 63.5713.

(f) Pursuant to 40 CFR 63.5746(b), the Permittee shall keep records of the solids content of each aluminum surface coating, including primers, topcoats and clear coats, determined using the methods specified in Condition D.2.14(b).

(g) Pursuant to 40 CFR 63.5746(f), the Permittee shall keep records of the calculations used to determine compliance with the emission limits for aluminum wipedown solvents and aluminum surface coatings specified in 40 CFR 63.5743(a) and Condition D.2.6.

(h) Pursuant to 40 CFR 63.5755, and depending upon which method is used to demonstrate compliance with the requirements of 40 CFR 63.5743(b) and 40 CFR 63.5755, the Permittee shall keep records of:

(1) The organic HAP content determined in Condition D.2.17(a): or

(2) The monthly inspections and any repairs that are made to the enclosed gun cleaners and covers in accordance with Condition D.2.17(b).

(i) Pursuant to 40 CFR 63.5767 and 40 CFR 63.5770, the Permittee shall keep the following records:

(1) In order to demonstrate compliance with Condition D.2.24, the Permittee shall keep a copy of each notification and report that the Permittee submitted to comply with 40 CFR 63, Subpart VVVV.

(2) All documentation supporting any notification or report that the Permittee submits.

(3) A Permittee complying with organic HAP content limits and application equipment requirements shall keep records of the following:

(A) The total amounts of open molding production resin, pigmented gel coat, clear gel coat, tooling resin, and tooling gel coat used per month and the weighted-average organic HAP contents for each operation, expressed as weight-percent. For open molding production resin and tooling resin, the Permittee shall also record the amounts of each applied by atomized and nonatomized methods.

(B) The total amount of each aluminum surface coating used per month (including primers, top coats, clear coats, thinners, and activators) and the weighted-average organic HAP content as determined in 40 CFR 63.5752 and Condition D.2.18(e).

(C) The total amount of each aluminum wipedown solvent used per month and the weighted-average organic HAP content as determined in 40 CFR 63.5749 and Condition D.2.18(d).

(4) Records must be readily available and in a form so they can be easily inspected and reviewed.

(5) Records must be kept for 5 years following the date that each record is generated.

(6) Records must be kept on site for at least 2 years after the date that each record is generated. The Permittee can keep the records offsite for the remaining 3 years.

(7) Records may be kept on paper or an alternative media, such as microfilm, computer, computer disks, magnetic tapes, or on microfiche.

D.2.23 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.2.1 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 being reported.

D.2.24 Notification Requirements for Fiberglass Boat Manufacturing Facilities [40 CFR 63.5761]

Pursuant to 40 CFR 63.5761, the Permittee shall submit all of the following notifications by the dates specified:

(a) The Permittee shall submit an initial notification containing the information specified in 40 CFR 63.9(b)(2) no later than 120 calendar days after August 22, 2001.

(b) The Permittee complying with organic HAP content limits, compliance status application equipment requirements; or MACT model point value averaging provisions shall submit a notification of compliance status as specified in 40 CFR 63.9(h) no later than 30 calendar days after August 22, 2004.

(c) If the Permittee changes any information submitted in any notification, the Permittee shall submit the changes in writing to the Administrator within 15 calendar days after the change.

D.2.25 Reporting Requirements for Fiberglass Boat Manufacturing Facilities [40 CFR 63.5764]

Pursuant to 40 CFR 63.5764, the Permittee shall submit the following reports by the dates specified unless the Administrator has approved a different schedule for submission of reports under 40 CFR 63.10(a):

(a) The first compliance report must cover the period beginning 12 months after August 22, 2004 and ending on December 31, 2005. The first compliance report shall be postmarked or delivered no later than 60 calendar days after the end of the compliance reporting period specified above. Each subsequent compliance report shall cover the applicable semiannual reporting period from January 1 through June 30 and from July 1 through December 31. Each subsequent compliance report shall be postmarked or delivered no later than 60 calendar days after the end of the semiannual reporting period. The compliance report must include the following information:

(1) Company name and address.

(2) A statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the report.

(3) The date of the report and the beginning and ending dates of the reporting period.

(4) A description of any changes in the manufacturing process since the last compliance report.

(5) A statement or table showing, for each regulated operation, the applicable organic HAP content limit with which the source is complying. The statement or table shall also show the actual weighted-average organic HAP content for each operation during each of the rolling 12-month averaging periods that end during the reporting period.

(6) If the Permittee was in compliance with the emission limits and work practice standards during the reporting period, the report shall include a statement to that effect.

(7) If the Permittee deviated from an emission limit or work practice standard during the reporting period, the report shall also include the information listed in the following four (4) paragraphs in the semiannual compliance report:

(A) A description of the operation involved in the deviation.

(B) The quantity, organic HAP content, and application method (if relevant) of the materials involved in the deviation.

(C) A description of any corrective action taken to minimize the deviation and actions the Permittee has taken to prevent it from happening again.

(D) A statement of whether or not the facility was in compliance for the 12-month averaging period that ended at the end of the reporting period.

(b) To the extent possible, the Permittee shall organize each report according to the operations covered by 40 CFR 63, Subpart VVVV and the compliance procedure followed for that operation.

SECTION D.3 FACILITY OPERATION CONDITIONS

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

(e) Two (2) fiberglass grinding and cutting operations, identified as 24-5FG and 25-7FG, controlled with fabric filters, canister filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute. Emissions from 24-5FG and 25-7FG are controlled by canister filter and dry filter and exhaust through stacks 24-5 and 25-7FG, respectively. [326 IAC 6-3]

(g) Three (3) insignificant woodworking operations, meeting the definition of insignificant woodworking operation pursuant to 326 IAC 2-7-1(21)(G)(xxx), identified as 9-1W, 24-1W and 28-1W, with emissions controlled by cyclones and return air bagfilter collection systems and exhausting inside the building and then to general ventilation.

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

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

D.3.1 Baghouse Limitations [326 IAC 2-7-1(21)(G)(xxx)]

The woodworking operations and fiberglass grinding and cutting operations controlled by a baghouse shall be an insignificant activity for Title V permitting purposes provided that the baghouse operations meet the requirements of 326 IAC 2-7-1(21)(G)(xxx), including the following:

(a) Each woodworking and fiberglass grinding and cutting baghouse shall not exhaust to the atmosphere greater than forty thousand (40,000) cubic feet of air per minute and shall not emit particulate matter with a diameter less than ten (10) microns in excess of one-hundredth (0.01) grain per dry standard cubic foot of outlet air.

(b) The opacity from each baghouse shall not exceed ten percent (10%).

(c) Visible emissions from the baghouse controlling the woodworking operations shall be observed daily using procedures in accordance with Method 22 and normal or abnormal emissions are recorded when venting to the atmosphere. Visible emissions from the baghouse controlling the fiberglass grinding and cutting operations shall be observed once per shift using procedures in accordance with Method 22 and normal or abnormal emissions are recorded when venting to the atmosphere. In the event abnormal emissions are observed for greater than six (6) minutes in duration, the following shall occur:

(1) The baghouse shall be inspected.

(2) Corrective actions, such as replacing or reseating bags, are initiated, when necessary.

D.3.2 Particulate [326 IAC 6-3-2]

(a) Pursuant to 326 IAC 6-3-2, the particulate from the woodworking operations (9-1W, 24-1W and 28-1W) shall be limited to 2.6 pounds per hour each when operating at a process weight of 1000 pounds per hour.

(b) Pursuant to 326 IAC 6-3-2, the particulate from the fiberglass grinding and cutting operation (24-5FG) shall be limited to 6.5 pounds per hour each when operating at a process weight of 4000 pounds per hour.

(c) Pursuant to 326 IAC 6-3-2, the particulate from the fiberglass grinding and cutting

operation (25-7FG) shall be limited by the following when working at a process weight rate greater than 100 pounds per hour:

The pounds per hour limitation was calculated with the following equation:

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

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

D.3.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

D.3.4 Particulate Control [326 IAC 2-7-21(1)(G)(xxx)(DD)

The baghouses for particulate control shall be in operation at all times when the woodworking facilities and fiberglass grinding and cutting operations are in operation. The cyclones for particulate control shall be in operation at all times when the wood working facilities are in operation.

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

D.3.5 Baghouse Inspections [326 IAC 2-7-21(1)(G)(xxx)(FF)

An inspection shall be performed each calendar quarter of all bags controlling the woodworking operations and fiberglass grinding and cutting operations when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

D.3.6 Cyclone Inspections

An inspection shall be performed each calendar quarter of all cyclones controlling the woodworking operations when venting to the atmosphere. A cyclone inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors.

D.3.7 Broken or Failed Bag Detection

In the event that bag failure has been observed:

(a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit. If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

(b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated

by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

D.3.8 Cyclone Failure Detection

In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions). Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

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

D.3.9 Record Keeping Requirements

(a) To document compliance with Conditions D.3.5 and D.3.6, the Permittee shall maintain records of the results of the inspections required under Conditions D.3.5 and D.3.6 when venting to the atmosphere and the dates the vents are redirected.

(b) To document compliance with Condition D.3.1(c), the Permittee shall maintain records of daily visible emission notations of the woodworking operations baghouse exhaust when venting to the atmosphere.

(c) To document compliance with Condition D.3.1(c), the Permittee shall maintain records of once per shift visible emission notations of the fiberglass grinding and cutting operations exhaust when venting to the atmosphere.

(d) The Permittee shall maintain records of corrective actions to document compliance with 326 IAC 2-7-21(1)(G)(xxx)(GG)(dd).

(e) To document compliance with Condition D.3.3, the Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan.

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

SECTION D.4 FACILITY OPERATION CONDITIONS

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

Insignificant Activities

(a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-3-2]

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

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

D.4.1 Cold Cleaner (Degreaser) Operations [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), the Permittee shall:

(a) equip the cleaner with a cover;

(b) equip the cleaner with a facility for draining cleaned parts;

(c) close the degreaser cover whenever parts are not being handled in the cleaner;

(d) drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

(e) provide a permanent, conspicuous label summarizing the operation requirements;

(f) store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

D.4.2 PSD Minor Limit [326 IAC 2-2]

Pursuant to Operating Permit 039-7570-00073, issued on August 25, 1999, the use of VOC from the entire source, including resins, gel coats, dilution solvents, cleaning solvents, and degreasing solvents shall be less than 250 tons per 12 consecutive month period, with compliance determined at the end of each month. This usage limit is required to limit the potential to emit of VOC to less than 250 tons per 12 consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable to the emission units constructed in 1988, 1992, 1993, and 1996.

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

D.4.3 Record Keeping Requirements

(a) To document compliance with Condition D.4.2, the Permittee shall maintain records of the amount and VOC content of the degreasing solvents used on a monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Records shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.4.2. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

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

D.4.4 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.4.2 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30)

days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

SECTION D.5 FACILITY OPERATION CONDITIONS

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

Insignificant Activities

(b) The following equipment related to manufacturing activities not resulting in the emission of HAPs, consisting of thirty-seven (37) welding machines, with emissions controlled by electrostatic precipitators, exhausting inside the building and then to general ventilation. Twenty (20) machines are located in building #3**,** and seventeen (17) machines are located in building #27. [326 IAC 6-3]

(c) Structural steel and bridge fabrication activities using 80 tons or less of welding consumables. [326 IAC 6-3]

(f) Two (2) touch-up of gelcoat/final finish operations including cleaning, polishing and waxing operations, identified as 23-3TU and 24-9TU, located in buildings 23 and 24, and touch-up of paint operations, identified as 1-1TU, located in building 1, with no emission controls and complying with the definition of insignificant activities in 326 IAC 2-7-1(21) (B) and (C). [326 IAC 6-3]

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

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

D.5.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate from the Structural Steel and Bridge Fabrication Activities, Welding Equipment, Insignificant Touch-up of Gelcoat/Final Finish Operations (23-3TU and 24-9TU) and the Insignificant Touch-up of Paint Operations (1-1TU) shall be limited by the following when working at a process weight rate of greater than or equal to 100 pounds per hour:

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

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

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

D.5.2 Particulate Control

In order to comply with D.5.1, the electrostatic precipitator control equipment for particulate control shall be in operation at all times that the welding equipment is in operation.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

PART 70 OPERATING PERMIT
CERTIFICATION

Source Name: Smoker Craft, Inc.
Source Address: 68143 Clunette Street, New Paris, Indiana 46553
Mailing Address: P.O. Box 65, New Paris, Indiana 46553
Part 70 Permit No.: T039-18527-00073

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:
Phone:
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

PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT

Source Name: Smoker Craft, Inc.
Source Address: 68143 Clunette Street, New Paris, Indiana 46553
Mailing Address: P.O. Box 65, New Paris, Indiana 46553
Part 70 Permit No.: T039-18527-00073

This form consists of 2 pages **Page 1 of 2**

☐ This is an emergency as defined in 326 IAC 2-7-1(12)
- 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
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

Part 70 Quarterly Report

Source Name: Smoker Craft, Inc.
Source Address: 68143 Clunette Street, New Paris, Indiana 46553
Mailing Address: P.O. Box 65, New Paris, Indiana 46553
Part 70 Permit No.: T039-18527-00073
Facility: Entire Source
Parameter: VOC emissions
Limit: Less than 250 tons per twelve month consecutive period, with compliance determined at the end of each month.

YEAR:

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

☐ No deviation occurred in this quarter.

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

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

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

Source Name: Smoker Craft, Inc.
Source Address: 68143 Clunette Street, New Paris, Indiana 46553
Mailing Address: P.O. Box 65, New Paris, Indiana 46553
Part 70 Permit No.: T039-18527-00073
Facility: Three (3) glue/adhesive spray booths (3-4GA, 3-5GA and 28-1GA) and two (2) glue stations (3-6GS, 25-6GS)
Parameter: VOC emissions
Limit: Less than 25 tons each per twelve month consecutive period, with compliance determined at the end of each month.

YEAR:

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

☐ No deviation occurred in this quarter.

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

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

Attach a signed certification to complete this report.

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

PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Smoker Craft, Inc.
Source Address: 68143 Clunette Street, New Paris, Indiana 46553
Mailing Address: P.O. Box 65, New Paris, Indiana 46553
Part 70 Permit No.: T039-18527-00073

Months: _____ to _____ Year: _____

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.	
☐ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
☐ 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

Technical Support Document (TSD) for a Part 70 Administrative Amendment

Source Description and Location

Source Name:	Smoker Craft, Inc.
Source Location:	68143 Clunette Street, New Paris, IN 46553
County:	Elkhart
SIC Code:	3732
Operation Permit No.:	T039-18527-00073
Operation Permit Issuance Date:	January 18, 2005
Administrative Amendment No.:	039-26115-00073
Permit Reviewer:	John Haney

Existing Approvals

The source was issued Part 70 Operating Permit No. T039-18527-00073 on January 18, 2005. The source has since received the following approvals:

(a) First Administrative Amendment No. 039-23194-00073**,** issued on August 30, 2006.

County Attainment Status

The source is located in Elkhart 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.

[1]Attainment effective October 18, 2000, for the 1-hour ozone standard for the South Bend-Elkhart area, including Elkhart County, and is a maintenance area for the 1-hour National Ambient Air Quality Standards (NAAQS) for purposes of 40 CFR 51, Subpart X*. The 1-hour standard was revoked effective June 15, 2005. Unclassifiable or attainment effective April 5, 2005, for PM2.5.

(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, St. Joseph 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, Clark, Elkhart, Floyd, LaPorte, Hamilton, Hancock, Hendricks, Johnson, Madison, Marion, Morgan, Shelby, and St. Joseph 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. Elkhart 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.

Elkhart County has been classified as attainment for PM2.5. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM2.5 emissions. Therefore, until the U.S. EPA adopts specific provisions for PSD review for PM2.5 emissions, it has directed states to regulate PM10 emissions as a surrogate for PM2.5 emissions.

(c) Other Criteria Pollutants
Elkhart 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.

Description of Proposed Modification

The Office of Air Quality (OAQ) has reviewed an administrative amendment application, submitted by Smoker Craft, Inc. on February 19, 2008 relating to the installation of thirteen (13) new welding machines in addition to its twenty-four (24) existing machines as well as the relocation of one glue/adhesive spray booth.

This modification will not result in debottlenecking or increase utilization of other existing units since the maximum throughput rate of the existing plant remains the same.

Enforcement Issues

There are no pending enforcement actions related to this modification.

Emission Calculations

See Appendix A of this Technical Support Document for detailed emission calculations.

Permit Level Determination – Part 70

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

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

PTE Before Controls of the Modification	
Pollutant	**Potential To Emit** (ton/yr)
PM	0.63
PM_{10}	0.63
SO_2	---
VOC	---
CO	---
NO_X	---

HAP PTE Before Controls of the Modification	
HAPs	**Potential To Emit** (ton/yr)
Manganese	0.06
TOTAL	0.06

The PTE for this modification is less than 5 tons per year for PM/PM_{10}, less than 1 ton per year for a single HAP, and less than 2.5 tons per year for total HAPs. This meets the definition of an insignificant activity as defined in 326 IAC 2-7-1(21). Since this proposed modification is an insignificant activity, the permit modification can be processed as an administrative amendment, pursuant to 326 IAC 2-7-11(a)(8).

Permit Level Determination – PSD or Emission Offset

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

	Potential to Emit (ton/yr)					
Process / Emission Unit	**PM**	**PM_{10}**	**SO_2**	**VOC**	**CO**	**NO_X**
Four (4) Welding Machines	0.63	0.63	---	---	---	---
Total for Modification	0.63	0.63	---	---	---	---
PSD Significant Level	25	15	NA	NA	NA	NA

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

Federal Rule Applicability Determination

The following federal rules are applicable to the source due to this modification:

(a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this proposed modification.

(b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) applicable to this proposed modification.

(c) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to new or modified emission units that involve a pollutant-specific emission unit and meet the following criteria:

(1) has a potential to emit before controls equal to or greater than the Part 70 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.

Based on this evaluation, the requirements of 40 CFR Part 64, CAM is not applicable to any of the new units as part of this modification.

State Rule Applicability Determination

The following state rules are applicable to the source due to the modification:

326 IAC 2-3 (Emission Offset)
This source is located in Elkhart County. Elkhart County had been designated as a nonattainment area for the 8-hour ozone standard in June, 2004; however, Elkhart County has been redesignated as an attainment area for the 8-hour ozone standard as of July 19, 2007. Therefore, this source is no longer a major source under Emission Offset.

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-2(e), the particulate matter (PM) from the thirteen (13) welding machines shall not exceed 0.551 pounds per hour when operating at a process weight rate of less than 100 pounds per hour.

The electrostatic precipitators shall be in operation at all times any of the welding machines are in operation, in order to comply with this limit.

Summary of Process Weight Rate Limits			
Process / Emission Unit	**P** (lb/hr)	**E** (lb/hr)	**Equation Used**
Thirteen (13) Welding Machines	0.551	<100	6-3-2(e)

Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions; however, these provisions do not always fulfill the requirement for a continuous demonstration. When this occurs, IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

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

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

(a) The thirteen (13) new welding machines have applicable compliance determination conditions as specified below:

In order to comply with D.5.1, the electrostatic precipitator control equipment for particulate control shall be in operation at all times that the welding equipment is in operation.

Proposed Changes

The changes listed below have been made to Part 70 Operating Permit No. T039-18527-00073. Deleted language appears as ~~strikethroughs~~ and new language appears in **bold**:

(a) To minimize future amendments to the issued Part 70 Permits, the OAQ decided to delete the name and/or title of the Responsible Official (RO) in Section A.1, General Information, of the permit. However, OAQ will still be evaluating if a change in RO meets the criteria specified in 326 IAC 2-7-1(34). This source is located in Elkhart County; Elkhart County has been redesignated as an attainment area for the 8-hour ozone standard as of July 19, 2007 and therefore is now a minor source under Emission Offset Rules. The revised permit condition is as follows:

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

The Permittee owns and operates a stationary fiberglass and aluminum boat manufacturing plant.

~~Responsible Official:~~	~~R. Joe Blackburn, Chief Financial Officer.~~
Source Address:	68143 Clunette Street, New Paris, Indiana 46553
Mailing Address:	68143 Clunette Street, P.O. Box 65, New Paris, Indiana 46553
General Source Phone Number:	(574) 831-7053
SIC Code:	3732
County Location:	Elkhart
Source Location Status:	~~Non-attainment for 8-hour ozone standard~~ Attainment for all ~~other~~ criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD ~~Major~~ **Minor** Source, under Emission Offset Rules Major Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

(b) Smoker Craft, Inc. is relocating one glue/adhesive spray booth from building #28 to building #7. The spray booth will have its emissions controlled by baffles. The revised permit condition has been changed throughout the entire permit as follows:

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

(a) Eight (8) glue/adhesive spray booths, identified as 3-1GA, 3-2GA, 3-3(a)GA, 3-3(b)GA, 3-4GA, 3-5GA, 23-1GA, each exhausting through Stack 23-1, and ~~28-1GA~~ **7-1GA** exhausting through Stack ~~28-1~~ **7-1**, each using air-assisted airless spray guns, with emissions controlled by baffles. Booths 3-4GA, 3-5GA and ~~28-1GA~~ **7-1GA** were constructed in 1993, 1996 and 1988, respectively. Booths 3-1GA, 3-2GA, 3-3(a)GA, 3-3(b)GA and 23-1GA were constructed prior to 1980.

(c) Smoker Craft, Inc. is installing thirteen (13) new welding machines, ten (10) metal inert gas (MIG) machines and three (3) tungsten inert gas (TIG) machines, into building #3. These thirteen (13) new welding machines have been determined to be an insignificant activity, as defined in 326 IAC 2-7-1(21); see Appendix A of the Technical Support Document for detailed emission calculations. Seven (7) additional existing welding machines are also to be repositioned from building #14 to building #3. All of the welding machines will have their emissions controlled by electrostatic precipitators, exhausting

inside the building and then to general ventilation. The revised permit condition is as follows:

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

(b) The following equipment related to manufacturing activities not resulting in the emission of HAPs, consisting of ~~twenty four (24)~~ **thirty-seven (37)** welding machines, with emissions controlled by electrostatic precipitators, exhausting inside the building and then to general ventilation. ~~Seven (7)~~ **Twenty (20)** machines are located in building ~~#14~~ **#3**, and seventeen (17) machines are located in building #27. [326 IAC 6-3]

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

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/Or

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue
MC 61-50 IGCN 1003
Indianapolis, Indiana 46204-2251

And/Or

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

And/Or

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

And/Or

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

And/Or

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

(e) Typographical numbering inaccuracies were corrected in Section B.

B.~~23~~ **24** Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)] [326 IAC 2-1.1-7]

B.~~24~~ **25** Credible Evidence [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [62 FR 8314] [326 IAC 1-1-6]

(f) The last sentence of original Condition C.3 – Open Burning, was deleted because the provisions of 326 IAC 4-1-3 (a)(2)(A) and (B) are federally enforceable and are included in Indiana's State Implementation Plan (SIP).

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

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

Conclusion and Recommendation

The construction and operation of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Administrative Amendment No. 039-26115-00073. The staff recommends to the Commissioner that this Part 70 Administrative Amendment be approved.

Appendix A: Emissions Calculations
Welding and Thermal Cutting

Company Name: Smoker Craft, Inc.
Address City IN Zip: 68143 Clunette Street, New Paris, IN 46553
Permit Number: 039-26115-00073
Plt ID: 039-00073
Reviewer: John Haney
Date: 3/12/2008

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)		EMISSION FACTORS* (lb pollutant/lb electrode)				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
WELDING				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
Submerged Arc	0			0.0360	0.0110			0.000	0.000	0.000	0	0.000
Metal Inert Gas (MIG)(carbon steel)	10	2		0.0055	0.0005			0.110	0.010	0.000	0	0.010
Stick (E7018 electrode)	0			0.0211	0.0009			0.000	0.000	0.000	0	0.000
Tungsten Inert Gas (TIG)(carbon stee	3	2		0.0055	0.0005			0.033	0.003	0.000	0	0.003
Oxyacetylene(carbon steel)	0			0.0055	0.0005			0.000	0.000	0.000	0	0.000
	Number of Stations	Max. Metal Thickness Cut (in.)	Max. Metal Cutting Rate (in./minute)	EMISSION FACTORS (lb pollutant/1,000 inches cut, 1" thick)**				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
FLAME CUTTING				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
Oxyacetylene	0			0.1622	0.0005	0.0001	0.0003	0.000	0.000	0.000	0.000	0.000
Oxymethane	0			0.0815	0.0002		0.0002	0.000	0.000	0.000	0.000	0.000
Plasma**	0			0.0039				0.000	0.000	0.000	0.000	0.000
EMISSION TOTALS												
Potential Emissions lbs/hr								0.14				0.01
Potential Emissions lbs/day								3.43				0.31
Potential Emissions tons/year								0.63				0.06

METHODOLOGY

*Emission Factors are default values for carbon steel unless a specific electrode type is noted in the Process column.
**Emission Factor for plasma cutting from American Welding Society (AWS). Trials reported for wet cutting of 8 mm thick mild steel with 3.5 m/min cutting speed (at 0.2 g/min emitted). Therefore, the emission factor for plasma cutting is for 8 mm thick rather than 1 inch, and the maximum metal thickness is not used in calculting the emissions.
Using AWS average values: (0.25 g/min)/(3.6 m/min) x (0.0022 lb/g)/(39.37 in./m) x (1,000 in.) = 0.0039 lb/1,000 in. cut, 8 mm thick
Plasma cutting emissions, lb/hr: (# of stations)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 8 mm thick)
Cutting emissions, lb/hr: (# of stations)(max. metal thickness, in.)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 1" tl
Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used)
Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day
Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/year x 1 ton/2,000 lb