INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant

DATE: July 21, 2008

RE: Smoker Craft, Inc. / 039-26375-00073

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

Notice of Decision: Approval – Effective Immediately

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

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-7-3 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

Recycled Paper An Equal Opportunity Employer *Please Recycle*

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

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

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

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

Enclosures
FNTV-PMOD.doc 3/27/08

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

July 21, 2008

Mr. Joel Bechtold
Smoker Craft, Inc.
68143 Clunette Street
P.O. Box 65
New Paris, IN 46553

Re: 039-26375-00073
Significant Permit Modification to
Part 70 Operating Permit Renewal No. T039-18527-00073

Dear Mr. Bechtold:

Smoker Craft, Inc. was issued a Part 70 Operating Permit Renewal T039-18527-00073 on January 18, 2005 for a stationary fiberglass and aluminum boat manufacturing plant. A letter requesting changes to this permit was received on March 25, 2008. Pursuant to the provisions of 326 IAC 2-7-12 a significant permit modification to this permit is hereby approved as described in the attached Technical Support Document.

The modification consists of the addition of four (4) surface coating booths using HVLP spray guns, identified as 6-3PB, 6-4PB, 6-5PB, and 6-6PB, with emissions controlled by dry filters and exhausting through stacks 6-3, 6-4, 6-5, and 6-6, respectively. Booths 6-3PB, 6-4PB, 6-5PB, and 6-6PB were approved for construction in 2008. The PSD minor limits have been updated to limit the potential to emit of VOC from the entire source to less than 250 tons per 12 consecutive month period.

All other conditions of the permit shall remain unchanged and in effect. Please find attached the entire Part 70 Operating Permit Renewal as modified.

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, OAQ, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251, or call at (800) 451-6027, and ask for John Haney or extension 4-5328, or dial (317) 234-5328.

Sincerely,

Original document 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

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

PART 70 SIGNIFICANT PERMIT MODIFICATION
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 Renewal 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 No. 039-26115-00073 issued on April 3, 2008.

First Significant Permit Modification: 039-26375-00073	
Issued by: *Original document signed by* Donald F. Robin, P.E., Section Chief Permits Branch Office of Air Quality	Issuance Date: July 21, 2008 Expiration Date: January 18, 2010

TABLE OF CONTENTS

SECTION A SOURCE SUMMARY 6
A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]
A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]
A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]
A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

SECTION B GENERAL CONDITIONS 8

B.1 Definitions [326 IAC 2-7-1]
B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5]
B.3 Terms of Conditions [326 IAC 2-1.1-9.5]
B.4 Enforceability [326 IAC 2-7-7]
B.5 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]
B.6 Severability [326 IAC 2-7-5(5)]
B.7 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]
B.8 Duty to Provide Information [326 IAC 2-7-5(6)(E)]
B.9 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]
B.10 Annual Compliance Certification [326 IAC 2-7-6(5)]
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]
B.12 Emergency Provisions [326 IAC 2-7-16]
B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]
B.14 Prior Permits Superseded [326 IAC 2-1.1-9.5]
B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]
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]
B.17 Permit Renewal [326 IAC 2-7-3] [326 IAC 2-7-4]
B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]
B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12(b)(2)]
B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]
B.21 Source Modification Requirement [326 IAC 2-7-10.5]
B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2] [IC 13-17-3-2] [IC 13-30-3-1]
B.23 Transfer of Ownership or Operational Control [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]
B.25 Credible Evidence [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [62 FR 8314]

SECTION C SOURCE OPERATION CONDITIONS 18

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]
C.2 Opacity [326 IAC 5-1]
C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]
C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]
C.5 Fugitive Dust Emissions [326 IAC 6-4]
C.6 Operation of Equipment [326 IAC 2-7-6(6)]
C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

Testing Requirements [326 IAC 2-7-6(1)]
C.8 Performance Testing [326 IAC 3-6]

Compliance Requirements [326 IAC 2-1.1-11]
C.9 Compliance Requirements [326 IAC 2-1.1-11]

TABLE OF CONTENTS (Continued)

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)]
C.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

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]
C.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]
C.14 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]
C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

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]
C.17 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]
C.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

Stratospheric Ozone Protection
C.19 Compliance with 40 CFR 82 and 326 IAC 22-1

SECTION D.1 FACILITY OPERATION CONDITIONS - Surface Coating 25

Emission Limitations and Standards [326 IAC 2-7-5(1)]
D.1.1 PSD Minor Limit [326 IAC 2-2]
D.1.2 Volatile Organic Compounds [326 IAC 8-1-6]
D.1.3 Particulate [326 IAC 6-3-2(d)]
D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements
D.1.5 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]
D.1.6 Monitoring

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]
D.1.7 Record Keeping Requirements
D.1.8 Reporting Requirements

SECTION D.2 FACILITY OPERATION CONDITIONS - Fiberglass and Gelcoat 28

Emission Limitations and Standards [326 IAC 2-7-5(1)]
D.2.1 PSD Minor Limit [326 IAC 2-2]
D.2.2 Particulate Matter (PM) [40 CFR 52, Subpart P]
D.2.3 Particulate [326 IAC 6-3-2(d)]
D.2.4 Emission Standards for Fiberglass Boat Manufacturing [326 IAC 20-48-2]
D.2.5 Work Practice Standards for Fiberglass Boat Manufacturing [326 IAC 20-48-3]
D.2.6 Operator Training for Fiberglass Boat Manufacturing [326 IAC 20-48-4]
D.2.7 Preventive Maintenance Plan [326 IAC 2-7-4(c)(9)]

TABLE OF CONTENTS (Continued)

Compliance Determination Requirements
D.2.8 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]
D.2.9 Monitoring

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]
D.2.10 Record Keeping Requirements
D.2.11 Reporting Requirements

SECTION D.3 FACILITY OPERATION CONDITIONS - Woodworking and Fiberglass Grinding..... 32

Emission Limitations and Standards [326 IAC 2-7-5(1)]
D.3.1 Baghouse Limitations [326 IAC 2-7-1(21)(g)(xxx)]
D.3.2 Particulate [326 IAC 6-3-2]
D.3.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements
D.3.4 Particulate Control [326 IAC 2-7-5(13)]

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]
D.3.5 Baghouse Inspections [326 IAC 2-7-2(1)(G)(xxx)(FF)]
D.3.6 Cyclone Inspections
D.3.7 Broken or Failed Bag Detection
D.3.8 Cyclone Failure Detection

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]
D.3.9 Record Keeping Requirements

SECTION D.4 FACILITY OPERATION CONDITIONS - Degreaser 35

Emission Limitations and Standards [326 IAC 2-7-5(1)]
D.4.1 Cold Cleaner (Degreaser) Operations [326 IAC 8-3-2]
D.4.2 PSD Minor Limit [326 IAC 2-2]

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]
D.4.3 Record Keeping Requirements
D.4.4 Reporting Requirements

SECTION D.5 FACILITY OPERATION CONDITIONS – Insignificant Activities..... 37

Emission Limitations and Standards [326 IAC 2-7-5(1)]
D.5.1 Particulate [326 IAC 6-3-2]

Compliance Determination Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]
D.5.2 Particulate Control

TABLE OF CONTENTS (Continued)

SECTION E.1 FACILITY OPERATION CONDITIONS 38

Emission Limitations and Standards [326 IAC 2-7-5(1)]
E.1.1 General Provisions Relating to NESHAP [326 IAC 20-1] [40 CFR Part 63, Subpart A]
E.1.2 National Emissions Standards for Hazardous Air Pollutants for Boat Manufacturing [40 CFR Part 63, Subpart VVVV] [326 IAC 20-48]

Certification 40
Emergency Occurrence Report 41-42
Quarterly Report 43-44
Quarterly Deviation and Compliance Monitoring Report 45-46

Attachment A --- NESHAP for Boat Manufacturing

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 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.

(i) Four (4) surface coating booths using HVLP spray guns, identified as 6-3PB, 6-4PB, 6-5PB, and 6-6PB, with emissions controlled by dry filters and exhausting through stacks 6-3, 6-4, 6-5, and 6-6, respectively. Booths 6-3PB, 6-4PB, 6-5PB, and 6-6PB were approved for construction in 2008.

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 April 15 of each year to:

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

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 46204-2251

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

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

(A) A description of the emergency;

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

(C) Corrective actions taken.

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

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

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

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

(e) 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 46204-2251

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

The Quarterly Deviation and Compliance Monitoring Report does require the certification by 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
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

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

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

(c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 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 46204-2251

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

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

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 46204-2251

and

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

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

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, 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 46204-2251

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 46204-2251

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by 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 46204-2251

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by 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 46204-2251

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

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

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

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 46204-2251

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 46204-2251

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

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

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

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

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.

(i) Four (4) surface coating booths using HVLP spray guns, identified as 6-3PB, 6-4PB, 6-5PB, and 6-6PB, with emissions controlled by dry filters and exhausting through stacks 6-3, 6-4, 6-5, and 6-6, respectively. Booths 6-3PB, 6-4PB, 6-5PB, and 6-6PB were approved for construction in 2008.

Under 40 CFR 63, Subpart VVVV, this fiberglass and aluminum boat manufacturing plant is considered an existing affected source.

(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 and SSM 039-26311-00073, 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, in combination with the usage limit in D.2.1, is required to limit the potential to emit of VOC to less than 250 tons per 12 consecutive month period. Compliance with these limits make 326 IAC 2-2 (PSD) not applicable to the emission units constructed in 1998, 1992, 1993, 1996, and 2008.

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 [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, 6-3PB, 6-4PB, 6-5PB, 6-6PB, 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.1.4 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.1.5 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.1.6 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, 6-3PB, 6-4PB, 6-5PB, 6-6PB, 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, 6-3, 6-4, 6-5, 6-6, 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.1.7 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.1.8 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.

Under 40 CFR 63, Subpart VVVV, this fiberglass and aluminum boat manufacturing plant is considered an existing affected source.

(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 and SSM 039-26311-00073, 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, in combination with the usage limit in D.1.1, is required to limit the potential to emit of VOC to less than 250 tons per 12 consecutive month period. Compliance with these limits make 326 IAC 2-2 (PSD) not applicable to the emission units constructed in 1998, 1992, 1993, 1996, and 2008.

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 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.2.5 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.2.6 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.2.7 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.2.8 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

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

D.2.9 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.2.10 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.2.7 and D.2.9, 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) Pursuant to 326 IAC 20-48-4, and in order to comply with Condition D.2.6, 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.

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

D.2.11 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.

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.

SECTION E.1 FACILITY OPERATION CONDITIONS

Emissions Unit Description:

(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.

(i) Four (4) surface coating booths using HVLP spray guns, identified as 6-3PB, 6-4PB, 6-5PB, and 6-6PB, with emissions controlled by dry filters and exhausting through stacks 6-3, 6-4, 6-5, and 6-6, respectively. Booths 6-3PB, 6-4PB, 6-5PB, and 6-6PB were approved for construction in 2008.

Specifically Regulated 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]

(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]

Under 40 CFR 63, Subpart VVVV, this fiberglass and aluminum boat manufacturing plant is considered an existing affected source.

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

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

E.1.1 General Provisions Relating to NESHAP [326 IAC 20-1] [40 CFR Part 63, Subpart A]

(a) Pursuant to 40 CFR 63.5686, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1, as specified in Table 15 of 40 CFR Part 63, Subpart VVVV in accordance with schedule in 40 CFR 63 Subpart VVVV.

(b) Pursuant to 40 CFR 63.10, the Permittee shall submit all required notifications and reports 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

E.1.2 National Emissions Standards for Hazardous Air Pollutants for Boat Naufacturing [40 CFR Part 63, Subpart VVVV] [326 IAC 20-48]

The Permittee shall comply with the following provisions of 40 CFR 63, Subpart VVVV (included as Attachment A of the permit), which are incorporated by reference in 326 IAC 20-48:

(1) 40 CFR 63.5698;
(2) 40 CFR 63.5713;
(3) 40 CFR 63.5731;
(4) 40 CFR 63.5734;
(5) 40 CFR 63.5737;
(6) 40 CFR 63.5740;
(7) 40 CFR 63.5743;
(8) 40 CFR 63.5746;
(9) 40 CFR 63.5753;
(10) 40 CFR 63.5755;
(11) 40 CFR 63.5758;
(12) 40 CFR 63.5761;
(13) 40 CFR 63.5764; and
(14) 40 CFR 63.5767.

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.

ATTACHMENT A

NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS

SUBPART VVVV—NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS FOR BOAT MANUFACTURING

§ 63.5680 What is the purpose of this subpart?

(a) This subpart establishes national emission standards for hazardous air pollutants (HAP) for new and existing boat manufacturing facilities with resin and gel coat operations, carpet and fabric adhesive operations, or aluminum recreational boat surface coating operations. This subpart also establishes requirements to demonstrate initial and continuous compliance with the emission standards.

§ 63.5683 Does this subpart apply to me?

(a) This subpart applies to you if you meet both of the criteria listed in paragraphs (a)(1) and (2) of this section.

(1) You are the owner or operator of a boat manufacturing facility that builds fiberglass boats or aluminum recreational boats.

(2) Your boat manufacturing facility is a major source of HAP either in and of itself, or because it is collocated with other sources of HAP, such that all sources combined constitute a major source.

(b) A boat manufacturing facility is a facility that manufactures hulls or decks of boats from fiberglass or aluminum, or assembles boats from premanufactured hulls and decks, or builds molds to make fiberglass hulls or decks. A facility that manufactures only parts of boats (such as hatches, seats, or lockers) or boat trailers is not considered a boat manufacturing facility for the purpose of this subpart.

(c) A major source is any stationary source or group of stationary sources located within a contiguous area and under common control that emits or can potentially emit, considering controls, in the aggregate, 9.1 megagrams (10 tons) or more per year of a single HAP or 22.7 megagrams (25 tons) or more per year of a combination of HAP.

(d) This subpart does not apply to aluminum coating operations on aluminum boats intended for commercial or military (nonrecreational) use, antifoulant coatings, assembly adhesives, fiberglass hull and deck coatings, research and development activities, mold sealing and release agents, mold stripping and cleaning solvents, and wood coatings as defined in §63.5779. This subpart does not apply to materials contained in handheld aerosol cans.

§ 63.5686 How do I demonstrate that my facility is not a major source?

You can demonstrate that your facility is not a major source by using the procedures in either paragraph (a) or (b) of this section.

(a) *Emission option.* You must demonstrate that your facility does not emit, and does not have the potential to emit as defined in §63.2, considering federally enforceable permit limits, 9.1 megagrams (10 tons) or more per year of a single HAP or 22.7 megagrams (25 tons) or more per year of a combination of HAP. To calculate your facility's potential to emit, you must include emissions from the boat manufacturing facility and all other sources that are collocated and under common ownership or control with the boat manufacturing facility.

(b) *Material consumption option.* This option can be used if you manufacture either fiberglass boats or aluminum recreational boats at your facility. You must meet the criteria in paragraph (b)(1), (2), or (3) of this section and comply with the requirements in paragraph (c) of this section. If you initially rely on the limits and criteria specified in paragraph (b)(1), (2), or (3) of this section to become an area source, but then exceed the relevant limit (without first obtaining and complying with other limits that keep your potential to emit HAP below major source levels), your facility will then become a major source, and you must comply with all applicable provisions of this subpart beginning on the compliance date specified in §63.5695. Nothing in this paragraph is intended to preclude you from limiting your facility's potential to emit through other federally enforceable mechanisms available through your permitting authority.

(1) If your facility is primarily a fiberglass boat manufacturing facility, you must demonstrate that you consume less than 45.4 megagrams per rolling 12-month period of all combined polyester-and vinylester-based resins and gel coats (including tooling and production resins and gel coats, and clear gel coats), and you must demonstrate that at least 90 percent of total annual HAP emissions at the facility (including emissions from aluminum recreational boat manufacturing or other source categories) originate from the fiberglass boat manufacturing materials.

(2) If your facility is primarily an aluminum recreational boat manufacturing facility, you must demonstrate that it consumes less than 18.2 megagrams per rolling 12-month period of all combined surface coatings, aluminum wipedown solvents, application gun cleaning solvents, and carpet and fabric adhesives; and you must demonstrate that at least 90 percent of total annual HAP emissions at the facility (including emissions from fiberglass boat manufacturing or other source categories) originate from the aluminum recreational boat manufacturing materials.

(3) If your facility is a fiberglass boat or an aluminum recreational boat manufacturing facility, you must demonstrate that the boat manufacturing materials consumed per rolling 12-month period contain a total of less than 4.6 megagrams of any single HAP and less than 11.4 megagrams of all combined HAP, and you must demonstrate that at least 90 percent of total annual HAP emissions at the facility (including emissions from other source categories) originate from these boat manufacturing materials.

(c) If you use the material consumption option described in paragraph (b) of this section to demonstrate that you are not a major source, you must comply with the requirements of paragraphs (c)(1) through (3) of this section.

(1) If your facility has HAP emissions that do not originate from boat manufacturing operations or materials described in paragraph (b), then you must keep any records necessary to demonstrate that the 90 percent criterion is met.

(2) A rolling 12-month period includes the previous 12 months of operation. You must maintain records of the total amount of materials described in paragraph (b) of this section used each month, and, if necessary, the HAP content of each material and the calculation of the total HAP consumed each month. Because records are needed for a 12-month period, you must keep records beginning no later than 12 months before the compliance date specified in §63.5695. Records must be kept for 5 years after they are created.

(3) In determining whether the 90 percent criterion included in paragraph (b) of this section is met, you do not need to include materials used in routine janitorial, building, or facility grounds maintenance; personal uses by employees or other persons; or products used for maintaining motor vehicles operated by the facility.

§ 63.5689 What parts of my facility are covered by this subpart?

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

(a) Open molding resin and gel coat operations (including pigmented gel coat, clear gel coat, production resin, tooling gel coat, and tooling resin).

(b) Closed molding resin operations.

(c) Resin and gel coat mixing operations.

(d) Resin and gel coat application equipment cleaning operations.

(e) Carpet and fabric adhesive operations.

(f) Aluminum hull and deck coating operations, including solvent wipedown operations and paint spray gun cleaning operations, on aluminum recreational boats.

§ 63.5692 How do I know if my boat manufacturing facility is a new source or an existing source?

(a) A boat manufacturing facility is a new source if it meets the criteria in paragraphs (a)(1) through (3) of this section.

(1) You commence construction of the affected source after July 14, 2000.

(2) It is a major source.

(3) It is a completely new boat manufacturing affected source where no other boat manufacturing affected source existed prior to the construction of the new source.

(b) For the purposes of this subpart, an existing source is any source that is not a new source.

§ 63.5695 When must I comply with this subpart?

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

Standards for Open Molding Resin and Gel Coat Operations

§ 63.5698 What emission limit must I meet for open molding resin and gel coat operations?

(a) You must limit organic HAP emissions from the five open molding operations listed in paragraphs (a)(1) through (5) of this section to the emission limit specified in paragraph (b) of this section. Operations listed in paragraph (d) are exempt from this limit.

(1) Production resin.

(2) Pigmented gel coat.

(3) Clear gel coat.

(4) Tooling resin.

(5) Tooling gel coat.

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

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

Where:

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

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

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

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

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

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

(c) The open molding emission limit is the same for both new and existing sources.

(d) The materials specified in paragraphs (d)(1) through (3) of this section are exempt from the open molding emission limit specified in paragraph (b) of this section.

(1) Production resins (including skin coat resins) that must meet specifications for use in military vessels or must be approved by the U.S. Coast Guard for use in the construction of lifeboats, rescue boats, and other 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. You must keep a record of the resins for which you are using this exemption.

(2) Pigmented, clear, and tooling gel coat used for part or mold repair and touch up. The total gel coat materials included in this exemption must not exceed 1 percent by weight of all gel coat used at your facility on a 12-month rolling-average basis. You must keep a record of the amount of gel coats used per month for which you are using this exemption and copies of calculations showing that the exempt amount does not exceed 1 percent of all gel coat used.

(3) Pure, 100 percent vinylester resin used for skin coats. This exemption does not apply to blends of vinylester and polyester resins used for skin coats. The total resin materials included in the exemption cannot exceed 5 percent by weight of all resin used at your facility on a 12-month rolling-average basis. You must keep a record of the amount of 100 percent vinylester skin coat resin used per month that is eligible for this exemption and copies of calculations showing that the exempt amount does not exceed 5 percent of all resin used.

§ 63.5701 What are my options for complying with the open molding emission limit?

You must use one or more of the options listed in paragraphs (a) through (c) of this section to meet the emission limit in §63.5698 for the resins and gel coats used in open molding operations at your facility.

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

(2) Those operations and materials not included in the emissions average must comply with either paragraph (b) or (c) of this section.

(b) *Compliant materials option.* Demonstrate compliance by using resins and gel coats that meet the organic HAP content requirements in Table 2 to this subpart. Compliance with this option is based on a 12-month rolling average.

(c) *Add-on control option.* Use an enclosure and add-on control device, and demonstrate that the resulting emissions meet the emission limit in §63.5698. Compliance with this option is based on control device performance testing and control device monitoring.

§ 63.5704 What are the general requirements for complying with the open molding emission limit?

(a) *Emissions averaging option.* For those open molding operations and materials complying using the emissions averaging option, you must demonstrate compliance by performing the steps in paragraphs (a)(1) through (5) of this section.

(1) Use the methods specified in §63.5758 to determine the organic HAP content of resins and gel coats.

(2) Complete the calculations described in §63.5710 to show that the organic HAP emissions do not exceed the limit specified in §63.5698.

(3) Keep records as specified in paragraphs (a)(3)(i) through (iv) of this section for each resin and gel coat.

(i) Hazardous air pollutant content.

(ii) Amount of material used per month.

(iii) Application method used for production resin and tooling resin. This record is not required if all production resins and tooling resins are applied with nonatomized technology.

(iv) Calculations performed to demonstrate compliance based on MACT model point values, as described in §63.5710.

(4) Prepare and submit the implementation plan described in §63.5707 to the Administrator and keep it up to date.

(5) Submit semiannual compliance reports to the Administrator as specified in §63.5764.

(b) *Compliant materials option.* For each open molding operation complying using the compliant materials option, you must demonstrate compliance by performing the steps in paragraphs (b)(1) through (4) of this section.

(1) Use the methods specified in §63.5758 to determine the organic HAP content of resins and gel coats.

(2) Complete the calculations described in §63.5713 to show that the weighted-average organic HAP content does not exceed the limit specified in Table 2 to this subpart.

(3) Keep records as specified in paragraphs (b)(3)(i) through (iv) of this section for each resin and gel coat.

(i) Hazardous air pollutant content.

(ii) Application method for production resin and tooling resin. This record is not required if all production resins and tooling resins are applied with nonatomized technology.

(iii) Amount of material used per month. This record is not required for an operation if all materials used for that operation comply with the organic HAP content requirements.

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

(4) Submit semiannual compliance reports to the Administrator as specified in §63.5764.

(c) *Add-on control option.* If you are using an add-on control device, you must demonstrate compliance by performing the steps in paragraphs (c)(1) through (5) of this section.

(1) Conduct a performance test of the control device as specified in §§63.5719 and 63.5722 to demonstrate initial compliance.

(2) Use the performance test results to determine control device parameters to monitor after the performance test as specified in §63.5725.

(3) Comply with the operating limits specified in §63.5715 and the control device and emission capture system monitoring requirements specified in §63.5725 to demonstrate continuous compliance.

(4) Keep the records specified in §63.5767.

(5) Submit to the Administrator the notifications and reports specified in §§63.5761 and 63.5764.

§ 63.5707 What is an implementation plan for open molding operations and when do I need to prepare one?

(a) You must prepare an implementation plan for all open molding operations for which you comply by using the emissions averaging option described in §63.5704(a).

(b) The implementation plan must describe the steps you will take to bring the open molding operations covered by this subpart into compliance. For each operation included in the emissions average, your implementation plan must include the elements listed in paragraphs (b)(1) through (3) of this section.

(1) A description of each operation included in the average.

(2) The maximum organic HAP content of the materials used, the application method used (if any atomized resin application methods are used in the average), and any other methods used to control emissions.

(3) Calculations showing that the operations covered by the plan will comply with the open molding emission limit specified in §63.5698.

(c) You must submit the implementation plan to the Administrator with the notification of compliance status specified in §63.5761.

(d) You must keep the implementation plan on site and provide it to the Administrator when asked.

(e) If you revise the implementation plan, you must submit the revised plan with your next semiannual compliance report specified in §63.5764.

§ 63.5710 How do I demonstrate compliance using emissions averaging?

(a) Compliance using the emissions averaging option is demonstrated on a 12-month rolling-average basis and is determined at the end of every month (12 times per year). The first 12-month rolling-average period begins on the compliance date specified in §63.5695.

(b) At the end of the twelfth month after your compliance date and at the end of every subsequent month, use equation 1 of this section to demonstrate that the organic HAP emissions from those operations included in the average do not exceed the emission limit in §63.5698 calculated for the same 12-month period. (Include terms in equation 1 of §63.5698 and equation 1 of this section for only those operations and materials included in the average.)

$$HAP\ \text{emissions} = \left[(\mathrm{PV_R})(M_R) + (PV_{PG})(M_{PG}) + (PV_{CG})(M_{CG}) + (PV_{TR})(M_{TR}) + (PV_{TG})(M_{TG})\right] \qquad (Eq.\ 1)$$

Where:

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

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

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

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

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

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

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

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

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

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

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

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

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

Where:

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

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

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

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

(d) You must use the equations in Table 3 to this subpart to calculate the MACT model point value (PV_i) for each resin and gel coat used in each operation in the past 12 months.

(e) If the organic HAP emissions, as calculated in paragraph (b) of this section, are less than the organic HAP limit calculated in §63.5698(b) for the same 12-month period, then you are in compliance with the emission limit in §63.5698 for those operations and materials included in the average.

[66 FR 44232, Aug. 22, 2001; 66 FR 50504, Oct. 3, 2001]

§ 63.5713 How do I demonstrate compliance using compliant materials?

(a) Compliance using the organic HAP content requirements listed in Table 2 to this subpart is based on a 12-month rolling average that is calculated at the end of every month. The first 12-month rolling-average period begins on the compliance date specified in §63.5695. If you are using filled material (production resin or tooling resin), you must comply according to the procedure described in §63.5714.

(b) At the end of the twelfth month after your compliance date and at the end of every subsequent month, review the organic HAP contents of the resins and gel coats used in the past 12 months in each operation. 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 to this subpart, then you are in compliance with the emission limit specified in §63.5698 for that 12-month period for that operation. In addition, you do not need to complete the weighted-average organic HAP content calculation contained in paragraph (c) of this section for that operation.

(c) At the end of every month, you must use equation 1 of this section to calculate the weighted-average organic HAP content for all resins and gel coats used in each operation in the past 12 months.

$$\textit{Weighted-Average}\ \text{HAP Content}\ (\%) = \frac{\sum_{i=1}^{n}(M_i\ \text{HAP}_i)}{\sum_{i=1}^{n}(M_i)} \qquad (Eq.\ 1)$$

Where:

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

HAP_i= Organic HAP content, by weight percent, of open molding resin or gel coat i used in the past 12 months in an operation. Use the methods in §63.5758 to determine organic HAP content.

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

(d) If the weighted-average organic HAP content does not exceed the applicable organic HAP content limit specified in Table 2 to this subpart, then you are in compliance with the emission limit specified in §63.5698.

§ 63.5714 How do I demonstrate compliance if I use filled resins?

(a) If you are using a filled production resin or filled tooling resin, you must demonstrate compliance for the filled material on an as-applied basis using equation 1 of this section.

$$PV_F = PV_u \times \frac{(100 - \%\ \text{Filler})}{100} \qquad (Eq.\ 1)$$

Where:

PV_F= The as-applied MACT model point value for a filled production resin or tooling resin, kilograms organic HAP per megagram of filled material.

PV_u= The MACT model point value for the neat (unfilled) resin, before filler is added, as calculated using the formulas in Table 3 to this subpart.

% Filler =The weight-percent of filler in the as-applied filled resin system.

(b) If the filled resin is used as a production resin and the value of PV_Fcalculated by equation 1 of this section does not exceed 46 kilograms of organic HAP per megagram of filled resin applied, then the filled resin is in compliance.

(c) If the filled resin is used as a tooling resin and the value of PV_Fcalculated by equation 1 of this section does not exceed 54 kilograms of organic HAP per megagram of filled resin applied, then the filled resin is in compliance.

(d) If you are including a filled resin in the emissions averaging procedure described in §63.5710, then use the value of PV_Fcalculated using equation 1 of this section for the value of PV i in equation 2 of §63.5710.

Demonstrating Compliance for Open Molding Operations Controlled by Add-On Control Devices

§ 63.5715 What operating limits must I meet?

(a) For open molding operations on which you use a thermal oxidizer as an add-on control device, you must meet the operating limits specified in Table 4 to this subpart that apply to the emission capture system and thermal oxidizer. You must establish the operating limits during the performance test according to the procedures in §63.5725. You must meet the operating limits at all times after you establish them.

(b) If you use an add-on control device other than a thermal oxidizer, or wish to monitor an alternative parameter and comply with a different operating limit, you must apply to the Administrator for approval of alternative monitoring under §63.8(f).

§ 63.5716 When must I conduct a performance test?

(a) If your source is an existing source, you must complete the add-on control device performance test no later than the compliance date specified in §63.5695.

(b) If your source is a new source, you must complete the add-on control device performance test no later than 180 days after the compliance date specified in §63.5695.

(c) You must conduct a performance test every 5 years as part of renewing your 40 CFR part 70 or 71 operating permit.

§ 63.5719 How do I conduct a performance test?

(a) You must capture the emissions using a permanent enclosure (such as a spray booth or similar containment device) and direct the captured emissions to the add-on control device.

(b) You must measure emissions as specified in paragraph (b)(1) or (2) of this section.

(1) If the enclosure vented to the control device is a permanent total enclosure as defined in Method 204 of appendix M to 40 CFR part 51, then you may measure emissions only at the outlet of the control device.

(2) If the permanent enclosure vented to the control device is not a total enclosure, you must build a temporary total enclosure, as defined in Method 204 of appendix M to 40 CFR part 51, around the permanent enclosure. You must then simultaneously measure emissions from the control device outlet and the emissions from the temporary total enclosure outlet. You determine compliance from the combined emissions from the control device outlet and the temporary total enclosure outlet.

(c) You must conduct the control device performance test using the emission measurement methods specified in paragraphs (c)(1) through (4) of this section.

(1) Use either Method 1 or 1A of appendix A to 40 CFR part 60, as appropriate, to select the sampling sites.

(2) Use Method 2, 2A, 2C, 2D, 2F or 2G of appendix A to 40 CFR part 60, as appropriate, to measure gas volumetric flow rate.

(3) Use Method 18 of appendix A to 40 CFR part 60 to measure organic HAP emissions or use Method 25A of appendix A to 40 CFR part 60 to measure total gaseous organic emissions as a surrogate for total organic HAP emissions. If you use Method 25A, you must assume that all gaseous organic emissions measured as carbon are organic HAP emissions. If you use Method 18 and the number of organic HAP in the exhaust stream exceeds five, you must take into account the use of multiple chromatographic columns and analytical techniques to get an accurate measure of at least 90 percent of the total organic HAP mass emissions. Do not use Method 18 to measure organic HAP emissions from a combustion device; use instead Method 25A and assume that all gaseous organic mass emissions measured as carbon are organic HAP emissions.

(4) You may use American Society for Testing and Materials (ASTM) D6420–99 (available for purchase from at least one of the following addresses: 100 Barr Harbor Drive, West Conshohocken, PA 19428–2959; or University Microfilms International, 300 North Zeeb Road, Ann Arbor, MI 48106.) in lieu of Method 18 of 40 CFR part 60, appendix A, under the conditions specified in paragraphs (c)(4)(i) through (iii) of this section.

(i) If the target compound(s) is listed in Section 1.1 of ASTM D6420–99 and the target concentration is between 150 parts per billion by volume and 100 parts per million by volume.

(ii) If the target compound(s) is not listed in Section 1.1 of ASTM D6420–99, but is potentially detected by mass spectrometry, an additional system continuing calibration check after each run, as detailed in Section 10.5.3 of ASTM D6420–99, must be followed, met, documented, and submitted with the performance test report even if you do not use a moisture condenser or the compound is not considered soluble.

(iii) If a minimum of one sample/analysis cycle is completed at least every 15 minutes.

(d) The control device performance test must consist of three runs and each run must last at least 1 hour. The production conditions during the test runs must represent normal production conditions with respect to the types of parts being made and material application methods. The production conditions during the test must also represent maximum potential emissions with respect to the organic HAP content of the materials being applied and the material application rates.

(e) During the test, you must also monitor and record separately the amounts of production resin, tooling resin, pigmented gel coat, clear gel coat, and tooling gel coat applied inside the enclosure that is vented to the control device.

§ 63.5722 How do I use the performance test data to demonstrate initial compliance?

Demonstrate initial compliance with the open molding emission limit as described in paragraphs (a) through (c) of this section:

(a) Calculate the organic HAP limit you must achieve using equation 1 of §63.5698. For determining initial compliance, the organic HAP limit is based on the amount of material used during the performance test, in megagrams, rather than during the past 12 months. Calculate the limit using the megagrams of resin and gel coat applied inside the enclosure during the three runs of the performance test and equation 1 of §63.5698.

(b) Add the total measured emissions, in kilograms, from all three of the 1-hour runs of the performance test.

(c) If the total emissions from the three 1-hour runs of the performance test are less than the organic HAP limit calculated in paragraph (a) of this section, then you have demonstrated initial compliance with the emission limit in §63.5698 for those operations performed in the enclosure and controlled by the add-on control device.

§ 63.5725 What are the requirements for monitoring and demonstrating continuous compliance?

(a) You must establish control device parameters that indicate proper operation of the control device.

(b) You must install, operate, and maintain a continuous parameter monitoring system as specified in paragraphs (b)(1) through (8) of this section.

(1) The continuous parameter monitoring system must complete a minimum of one cycle of operation for each successive 15-minute period. You must have a minimum of four successive cycles of operation to have a valid hour of data.

(2) You must have valid data from at least 90 percent of the hours during which the process operated.

(3) You must determine the average of all recorded readings for each successive 3-hour period of the emission capture system and add-on control device operation.

(4) You must maintain the continuous parameter monitoring system at all times and have available necessary parts for routine repairs of the monitoring equipment.

(5) You must operate the continuous parameter monitoring system and collect emission capture system and add-on control device parameter data at all times that a controlled open molding operation is being performed, except during monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, if applicable, calibration checks and required zero and span adjustments).

(6) You must not use emission capture system or add-on control device parameter data recorded during monitoring malfunctions, associated repairs, out-of-control periods, or required quality assurance or control activities when calculating data averages. You must use all the data collected during all other periods in calculating the data averages for determining compliance with the emission capture system and add-on control device operating limits.

(7) You must record the results of each inspection, calibration, and validation check.

(8) Any period for which the monitoring system is out-of-control, as defined in §63.7(d)(7), or malfunctioning, and data are not available for required calculations is a deviation from the monitoring requirements. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the continuous parameter monitoring system to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

(c) *Enclosure bypass line.* You must meet the requirements of paragraphs (c)(1) and (2) of this section for each emission capture system enclosure that contains bypass lines that could divert emissions away from the add-on control device to the atmosphere.

(1) You must monitor or secure the valve or closure mechanism controlling the bypass line in a nondiverting position in such a way that the valve or closure mechanism cannot be opened without creating a record that the valve was opened. The method used to monitor or secure the valve or closure mechanism must meet one of the requirements specified in paragraphs (c)(1)(i) through (iv) of this section.

(i) *Flow control position indicator.* Install, calibrate, maintain, and operate according to the manufacturer's specifications a flow control position indicator that takes a reading at least once every 15 minutes and provides a record indicating whether the emissions are directed to the add-on control device or diverted from the add-on control device. The time of occurrence and flow control position must be recorded, as well as every time the flow direction is changed. The flow control position indicator must be installed at the entrance to any bypass line that could divert the emissions away from the add-on control device to the atmosphere.

(ii) *Car-seal or lock-and-key valve closures.* Secure any bypass line valve in the closed position with a car-seal or a lock-and-key type configuration. You must visually inspect the seal or closure mechanism at least once every month to ensure that the valve is maintained in the closed position, and the emissions are not diverted away from the add-on control device to the atmosphere.

(iii) *Valve closure continuous monitoring.* Ensure that any bypass line valve is in the closed (non-diverting) position through monitoring of valve position at least once every 15 minutes. You must inspect the monitoring system at least once every month to verify that the monitor will indicate valve position.

(iv) *Automatic shutdown system.* Use an automatic shutdown system in which the open molding operation is stopped when flow is diverted by the bypass line away from the add-on control device to the atmosphere when the open molding operation is running. You must inspect the automatic shutdown system at least once every month to verify that it will detect diversions of flow and shut down the open molding operation.

(2) If any bypass line is opened, you must include a description of why the bypass line was opened and the length of time it remained open in the semiannual compliance reports required in §63.5764(d).

(d) *Thermal oxidizers.* If you are using a thermal oxidizer or incinerator as an add-on control device, you must comply with the requirements in paragraphs (d)(1) through (6) of this section.

(1) You must install a combustion temperature monitoring device in the firebox of the thermal oxidizer or incinerator, or in the duct immediately downstream of the firebox before any substantial heat exchange occurs. You must meet the requirements in paragraphs (b) and (d)(1)(i) through (vii) of this section for each temperature monitoring device.

(i) Locate the temperature sensor in a position that provides a representative temperature.

(ii) Use a temperature sensor with a minimum tolerance of 2.2 °C or 0.75 percent of the temperature value, whichever is larger.

(iii) Shield the temperature sensor system from electromagnetic interference and chemical contaminants.

(iv) If a chart recorder is used, it must have a sensitivity in the minor division of at least 10 °C.

(v) Perform an electronic calibration at least semiannually according to the procedures in the manufacturer's owners manual. Following the electronic calibration, you must conduct a temperature sensor validation check in which a second or redundant temperature sensor placed nearby the process temperature sensor must yield a reading within 16.7 °C of the process temperature sensor's reading.

(vi) Conduct calibration and validation checks any time the sensor exceeds the manufacturer's specified maximum operating temperature range or install a new temperature sensor.

(vii) At least monthly, inspect all components for integrity and all electrical connections for continuity, oxidation, and galvanic corrosion.

(2) Before or during the performance test, you must conduct a performance evaluation of the combustion temperature monitoring system according to §63.8(e). Section 63.8(e) specifies the general requirements for continuous monitoring systems and requirements for notifications, the site-specific performance evaluation plan, conduct of the performance evaluation, and reporting of performance evaluation results.

(3) During the performance test required by §63.5716, you must monitor and record the combustion temperature and determine the average combustion temperature for the three 1-hour test runs. This average temperature is the minimum operating limit for the thermal oxidizer.

(4) Following the performance test, you must continuously monitor the combustion temperature and record the average combustion temperature no less frequently than every 15 minutes.

(5) You must operate the incinerator or thermal oxidizer so that the average combustion temperature in any 3-hour period does not fall below the average combustion temperature recorded during the performance test.

(6) If the average combustion temperature in any 3-hour period falls below the average combustion temperature recorded during the performance test, or if you fail to collect the minimum data specified in paragraph (d)(4) of this section, it is a deviation for the operating limit in §63.5715.

(e) *Other control devices.* If you are using a control device other a thermal oxidizer, then you must comply with alternative monitoring requirements and operating limits approved by the Administrator under §63.8(f).

(f) *Emission capture system.* For each enclosure in the emission capture system, you must comply with the requirements in paragraphs (f)(1) through (5) of this section.

(1) You must install a device to measure and record either the flow rate or the static pressure in the duct from each enclosure to the add-on control device.

(2) You must install a device to measure and record the pressure drop across at least one opening in each enclosure.

(3) Each flow measurement device must meet the requirements in paragraphs (b) and (f)(3)(i) through (iv) of this section.

(i) Locate the flow sensor in a position that provides a representative flow measurement in the duct between each enclosure in the emission capture system and the add-on control device.

(ii) Reduce swirling flow or abnormal velocity distributions due to upstream and downstream disturbances.

(iii) Conduct a flow sensor calibration check at least semiannually.

(iv) At least monthly, inspect all components for integrity, all electrical connections for continuity, and all mechanical connections for leakage.

(4) For each pressure measurement device, you must comply with the requirements in paragraphs (a) and (f)(4)(i) through (vii) of this section.

(i) Locate each pressure drop sensor in or as close to a position that provides a representative measurement of the pressure drop across each enclosure opening you are monitoring.

(ii) Locate each duct static pressure sensor in a position that provides a representative measurement of the static pressure in the duct between the enclosure and control device.

(iii) Minimize or eliminate pulsating pressure, vibration, and internal and external corrosion.

(iv) Check the pressure tap for plugging daily.

(v) Use an inclined manometer with a measurement sensitivity of 0.0004 millimeters mercury (mmHg) to check gauge calibration quarterly and transducer calibration monthly.

(vi) Conduct calibration checks any time the sensor exceeds the manufacturer's specified maximum operating pressure range or install a new pressure sensor.

(vii) At least monthly, inspect all components for integrity, all electrical connections for continuity, and all mechanical connections for leakage.

(5) For each capture device that is not part of a permanent total enclosure as defined in Method 204 in appendix M to 40 CFR part 51, you must establish an operating limit for either the gas volumetric flow rate or duct static pressure, as specified in paragraphs (f)(5)(i) and (ii) of this section. You must also establish an operating limit for pressure drop across at least one opening in each enclosure according to paragraphs

(f)(5)(iii) and (iv) of this section. The operating limits for a permanent total enclosure are specified in Table 4 to this subpart.

(i) During the emission test required by §63.5716 and described in §63.5719, you must monitor and record either the gas volumetric flow rate or the duct static pressure for each separate enclosure in your emission capture system at least once every 15 minutes during each of the three test runs at a point in the duct between the enclosure and the add-on control device inlet.

(ii) Following the emission test, calculate and record the average gas volumetric flow rate or duct static pressure for the three test runs for each enclosure. This average gas volumetric flow rate or duct static pressure is the minimum operating limit for that specific enclosure.

(iii) During the emission test required by §63.5716 and described in §63.5719, you must monitor and record the pressure drop across the opening of each enclosure in your emission capture system at least once every 15 minutes during each of the three test runs.

(iv) Following the emission test, calculate and record the average pressure drop for the three test runs for each enclosure. This average pressure drop is the minimum operating limit for that specific enclosure.

Standards for Closed Molding Resin Operations

§ 63.5728 What standards must I meet for closed molding resin operations?

(a) If a resin application operation meets the definition of closed molding specified in §63.5779, there is no requirement to reduce emissions from that operation.

(b) If the resin application operation does not meet the definition of closed molding, then you must comply with the limit for open molding resin operations specified in §63.5698.

(c) Open molding resin operations that precede a closed molding operation must comply with the limit for open molding resin and gel coat operations specified in §63.5698. Examples of these operations include gel coat or skin coat layers that are applied before lamination is performed by closed molding.

Standards for Resin and Gel Coat Mixing Operations

§ 63.5731 What standards must I meet for resin and gel coat mixing operations?

(a) All resin and gel coat mixing containers with a capacity equal to or greater than 208 liters, including those used for on-site mixing of putties and polyputties, must have a cover with no visible gaps in place at all times.

(b) The work practice standard in paragraph (a) of this section does not apply when material is being manually added to or removed from a container, or when mixing or pumping equipment is being placed in or removed from a container.

(c) To demonstrate compliance with the work practice standard in paragraph (a) of this section, you must visually inspect all mixing containers subject to this standard at least once per month. The inspection should ensure that all containers have covers with no visible gaps between the cover and the container, or between the cover and equipment passing through the cover.

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

Standards for Resin and Gel Coat Application Equipment Cleaning Operations

§ 63.5734 What standards must I meet for resin and gel coat application equipment cleaning operations?

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

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

§ 63.5737 How do I demonstrate compliance with the resin and gel coat application equipment cleaning standards?

(a) Determine and record the organic HAP content of the cleaning solvents subject to the standards specified in §63.5734 using the methods specified in §63.5758.

(b) If you recycle cleaning solvents on site, you may use documentation from the solvent manufacturer or supplier or a measurement of the organic HAP content of the cleaning solvent as originally obtained from the solvent supplier for demonstrating compliance, subject to the conditions in §63.5758 for demonstrating compliance with organic HAP content limits.

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

Standards for Carpet and Fabric Adhesive Operations

§ 63.5740 What emission limit must I meet for carpet and fabric adhesive operations?

(a) You must use carpet and fabric adhesives that contain no more than 5 percent organic HAP by weight.

(b) To demonstrate compliance with the emission limit in paragraph (a) of this section, you must determine and record the organic HAP content of the carpet and fabric adhesives using the methods in §63.5758.

Standards for Aluminum Recreational Boat Surface Coating Operations

§ 63.5743 What standards must I meet for aluminum recreational boat surface coating operations?

(a) For aluminum wipedown solvent operations and aluminum surface coating operations, you must comply with either the separate emission limits in paragraphs (a)(1) and (2) of this section, or the combined emission limit in paragraph (a)(3) of this section. Compliance with these limitations is based on a 12-month rolling average that is calculated at the end of every month.

(1) You must limit emissions from aluminum wipedown solvents to no more than 0.33 kilograms of organic HAP per liter of total coating solids applied from aluminum primers, clear coats, and top coats combined. No limit applies when cleaning surfaces are receiving decals or adhesive graphics.

(2) You must limit emissions from aluminum recreational boat surface coatings (including thinners, activators, primers, topcoats, and clear coats) to no more than 1.22 kilograms of organic HAP per liter of total coating solids applied from aluminum primers, clear coats, and top coats combined.

(3) You must limit emissions from the combined aluminum surface coatings and aluminum wipedown solvents to no more than 1.55 kilograms of organic HAP per liter of total coating solids applied from aluminum primers, clear coats, and top coats combined.

(b) You must comply with the work practice standard in paragraph (b)(1), (2), (3), or (4) of this section when cleaning aluminum coating spray guns with solvents containing more than 5 percent organic HAP by weight.

(1) Clean spray guns in an enclosed device. Keep the device closed except when you place spray guns in or remove them from the device.

(2) Disassemble the spray gun and manually clean the components in a vat. Keep the vat closed when you are not using it.

(3) Clean spray guns by placing solvent in the pressure pot and forcing the solvent through the gun. Do not use atomizing air during this procedure. Direct the used cleaning solvent from the spray gun into a container that you keep closed when you are not using it.

(4) An alternative gun cleaning process or technology approved by the Administrator according to the procedures in §63.6(g).

§ 63.5746 How do I demonstrate compliance with the emission limits for aluminum wipedown solvents and aluminum coatings?

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

(a) Determine and record the organic HAP content (kilograms of organic HAP per kilogram of material, or weight fraction) of each aluminum wipedown solvent and aluminum coating (including primers, topcoats, clear coats, thinners, and activators). Use the methods in §63.5758 to determine organic HAP content.

(b) Use the methods in §63.5758(b) to determine the solids content (liters of solids per liter of coating, or volume fraction) of each aluminum surface coating, including primers, topcoats, and clear coats. Keep records of the solids content.

(c) Use the methods in §63.5758(c) to determine the density of each aluminum surface coating and wipedown solvent.

(d) Compliance is based on a 12-month rolling average calculated at the end of every month. The first 12-month rolling-average period begins on the compliance date specified in §63.5695.

(e) At the end of the twelfth month after your compliance date and at the end of every subsequent month, use the procedures in §63.5749 to calculate the organic HAP from aluminum wipedown solvents per liter of coating solids, and use the procedures in §63.5752 to calculate the kilograms of organic HAP from aluminum coatings per liter of coating solids.

(f) Keep records of the calculations used to determine compliance.

(g) *Approval of alternative means of demonstrating compliance.* You may apply to the Administrator for permission to use an alternative means (such as an add-on control system) of limiting emissions from aluminum wipedown solvent and coating operations and demonstrating compliance with the emission limits in §63.5743(a).

(1) The application must include the information listed in paragraphs (g)(1)(i) through (iii) of this section.

(i) An engineering evaluation that compares the emissions using the alternative means to the emissions that would result from using the strategy specified in paragraphs (a) through (e) of this section. The engineering evaluation may include the results from an emission test that accurately measures the capture efficiency and control device efficiency achieved by the control system and the composition of the associated coatings so that the emissions comparison can be made.

(ii) A proposed monitoring protocol that includes operating parameter values to be monitored for compliance and an explanation of how the operating parameter values will be established through a performance test.

(iii) Details of appropriate recordkeeping and reporting procedures.

(2) The Administrator will approve the alternative means of limiting emissions if the Administrator determines that HAP emissions will be no greater than if the source uses the procedures described in paragraphs (a) through (e) of this section to demonstrate compliance.

(3) The Administrator's approval may specify operation, maintenance, and monitoring requirements to ensure that emissions from the regulated operations are no greater than those that would otherwise result from regulated operations in compliance with this subpart.

§ 63.5749 How do I calculate the organic HAP content of aluminum wipedown solvents?

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

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

Where:

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

n = number of different wipedown solvents used in the past 12 months.

Vol_j= volume of aluminum wipedown solvent j used in the past 12 months, liters.

D_j= density of aluminum wipedown solvent j, kilograms per liter.

W_j= mass fraction of organic HAP in aluminum wipedown solvent j.

m = number of different aluminum surface coatings (primers, top coats, and clear coats) used in the past 12 months.

Vol_i= volume of aluminum primer, top coat, or clear coat i used in the past 12 months, liters.

$Solids_i$= solids content aluminum primer, top coat, or clear coat i, liter solids per liter of coating.

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

§ 63.5752 How do I calculate the organic HAP content of aluminum recreational boat surface coatings?

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

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

Where:

HAP_{SC}= weighted-average organic HAP content for all aluminum coating materials, kilograms of organic HAP per liter of coating solids.

m = number of different aluminum primers, top coats, and clear coats used in the past 12 months.

Vol_i= volume of aluminum primer, top coat, or clear coat i used in the past 12 months, liters.

D_i= density of coating i, kilograms per liter.

W_i= mass fraction of organic HAP in coating i, kilograms of organic HAP per kilogram of coating.

p = number of different thinners, activators, and other coating additives used in the past 12 months.

Vol_k= total volume of thinner, activator, or additive k used in the past 12 months, liters.

D_k= density of thinner, activator, or additive k, kilograms per liter.

W_k= mass fraction of organic HAP in thinner, activator, or additive k, kilograms of organic HAP per kilogram of thinner or activator.

$Solids_i$= solids content of aluminum primer, top coat, or clear coat i, liter solids per liter of coating.

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

§ 63.5753 How do I calculate the combined organic HAP content of aluminum wipedown solvents and aluminum recreational boat surface coatings?

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

$$HAP_{Combined} = HAP_{WD} + HAP_{SC} \qquad (Eq.\ 1)$$

Where:

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

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

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

§ 63.5755 How do I demonstrate compliance with the aluminum recreational boat surface coating spray gun cleaning work practice standards?

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

(a) Demonstrate that solvents used to clean the aluminum coating spray guns contain no more than 5 percent organic HAP by weight by determining organic HAP content with the methods in §63.5758. Keep records of the organic HAP content determination.

(b) For solvents containing more than 5 percent organic HAP by weight, comply with the requirements in paragraph (b)(1) or (b)(2), and paragraph (b)(3) of this section.

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

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

(3) Keep records of the monthly inspections and any repairs that are made to the enclosed gun cleaners or the covers.

Methods for Determining Hazardous Air Pollutant Content

§ 63.5758 How do I determine the organic HAP content of materials?

(a) *Determine the organic HAP content for each material used.* To determine the organic HAP content for each material used in your open molding resin and gel coat operations, carpet and fabric adhesive operations, or aluminum recreational boat surface coating operations, you must use one of the options in paragraphs (a)(1) through (6) of this section.

(1) *Method 311 (appendix A to 40 CFR part 63).* You may use Method 311 for determining the mass fraction of organic HAP. Use the procedures specified in paragraphs (a)(1)(i) and (ii) of this section when determining organic HAP content by Method 311.

(i) Include in the organic HAP total each organic HAP that is measured to be present at 0.1 percent by mass or more for Occupational Safety and Health Administration (OSHA)-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and at 1.0 percent by mass or more for other compounds. For example, if toluene (not an OSHA carcinogen) is measured to be 0.5 percent of the material by mass, you do not need to include it in the organic HAP total. Express the mass fraction of each organic HAP you measure as a value truncated to four places after the decimal point (for example, 0.1234).

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

(2) *Method 24 (appendix A to 40 CFR part 60).* You may use Method 24 to determine the mass fraction of non-aqueous volatile matter of aluminum coatings and use that value as a substitute for mass fraction of organic HAP.

(3) *ASTM D1259–85 (Standard Test Method for Nonvolatile Content of Resins).* You may use ASTM D1259–85 (available for purchase from ASTM) to measure the mass fraction of volatile matter of resins and gel coats for open molding operations and use that value as a substitute for mass fraction of organic HAP.

(4) *Alternative method.* You may use an alternative test method for determining mass fraction of organic HAP if you obtain prior approval by the Administrator. You must follow the procedure in §63.7(f) to submit an alternative test method for approval.

(5) *Information from the supplier or manufacturer of the material.* You may rely on information other than that generated by the test methods specified in paragraphs (a)(1) through (4) of this section, such as manufacturer's formulation data, according to paragraphs (a)(5)(i) through (iii) of this section.

(i) Include in the organic HAP total each organic HAP that is present at 0.1 percent by mass or more for OSHA-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and at 1.0 percent by mass or more for other compounds. For example, if toluene (not an OSHA carcinogen) is 0.5 percent of the material by mass, you do not have to include it in the organic HAP total.

(ii) If the organic HAP content is provided by the material supplier or manufacturer as a range, then you must use the upper limit of the range for determining compliance. If a separate measurement of the total organic HAP content using the methods specified in paragraphs (a)(1) through (4) of this section exceeds the upper limit of the range of the total organic HAP content provided by the material supplier or manufacturer, then you must use the measured organic HAP content to determine compliance.

(iii) If the organic HAP content is provided as a single value, you may assume the value is a manufacturing target value and actual organic HAP content may vary from the target value. If a separate measurement of the total organic HAP content using the methods specified in paragraphs (a)(1) through (4) of this section is less than 2 percentage points higher than the value for total organic HAP content provided by the material supplier or manufacturer, then you may use the provided value to demonstrate compliance. If the measured total organic HAP content exceeds the provided value by 2 percentage points or more, then you must use the measured organic HAP content to determine compliance.

(6) *Solvent blends.* Solvent blends may be listed as single components for some regulated materials in certifications provided by manufacturers or suppliers. Solvent blends may contain organic HAP which must be counted toward the total organic HAP content of the materials. When detailed organic HAP content data for solvent blends are not available, you may use the values for organic HAP content that are listed in Table 5 or 6 to this subpart. You may use Table 6 to this subpart only if the solvent blends in the materials you use do not match any of the solvent blends in Table 5 to this subpart and you know only whether the blend is either aliphatic or aromatic. However, if test results indicate higher values than those listed in Table 5 or 6 to this subpart, then the test results must be used for determining compliance.

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

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

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

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

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

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

Notifications, Reports, and Records

§ 63.5761 What notifications must I submit and when?

(a) You must submit all of the notifications in Table 7 to this subpart that apply to you by the dates in the table. The notifications are described more fully in 40 CFR part 63, subpart A, General Provisions, referenced in Table 8 to this subpart.

(b) If you change any information submitted in any notification, you must submit the changes in writing to the Administrator within 15 calendar days after the change.

§ 63.5764 What reports must I submit and when?

(a) You must submit the applicable reports specified in paragraphs (b) through (e) of this section. To the extent possible, you must organize each report according to the operations covered by this subpart and the compliance procedure followed for that operation.

(b) Unless the Administrator has approved a different schedule for submission of reports under §63.10(a), you must submit each report by the dates in paragraphs (b)(1) through (5) of this section.

(1) If your source is not controlled by an add-on control device (i.e., you are complying with organic HAP content limits, application equipment requirements, or MACT model point value averaging provisions), the first compliance report must cover the period beginning 12 months after the compliance date specified for your source in §63.5695 and ending on June 30 or December 31, whichever date is the first date following the end of the first 12-month period after the compliance date that is specified for your source in §63.5695. If your source is controlled by an add-on control device, the first compliance report must cover the period beginning on the compliance date specified for your source in §63.5695 and ending on June 30 or December 31, whichever date is the first date following the end of the first calendar half after the compliance date that is specified for your source in §63.5695.

(2) The first compliance report must be postmarked or delivered no later than 60 calendar days after the end of the compliance reporting period specified in paragraph (b)(1) of this section.

(3) Each subsequent compliance report must cover the applicable semiannual reporting period from January 1 through June 30 or from July 1 through December 31.

(4) Each subsequent compliance report must be postmarked or delivered no later than 60 calendar days after the end of the semiannual reporting period.

(5) For each affected source that is subject to permitting regulations pursuant to 40 CFR part 70 or 71, and if the permitting authority has established dates for submitting semiannual reports pursuant to 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), you may submit the first and subsequent compliance reports according to the dates the permitting authority has established instead of according to the dates in paragraphs (b)(1) through (4) of this section.

(c) The compliance report must include the information specified in paragraphs (c)(1) through (7) of this section.

(1) Company name and address.

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

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

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

(5) A statement or table showing, for each regulated operation, the applicable organic HAP content limit, application equipment requirement, or MACT model point value averaging provision with which you are complying. The statement or table must also show the actual weighted-average organic HAP content or weighted-average MACT model point value (if applicable) for each operation during each of the rolling 12-month averaging periods that end during the reporting period.

(6) If you were in compliance with the emission limits and work practice standards during the reporting period, you must include a statement to that effect.

(7) If you deviated from an emission limit or work practice standard during the reporting period, you must also include the information listed in paragraphs (c)(7)(i) through (iv) of this section in the semiannual compliance report.

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

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

(iii) A description of any corrective action you took to minimize the deviation and actions you have taken to prevent it from happening again.

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

(d) If your facility has an add-on control device, you must submit semiannual compliance reports and quarterly excess emission reports as specified in §63.10(e). The contents of the reports are specified in §63.10(e).

(e) If your facility has an add-on control device, you must complete a startup, shutdown, and malfunction plan as specified in §63.6(e), and you must submit the startup, shutdown, and malfunction reports specified in §63.10(e)(5).

§ 63.5767 What records must I keep?

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

(a) You must keep a copy of each notification and report that you submitted to comply with this subpart.

(b) You must keep all documentation supporting any notification or report that you submitted.

(c) If your facility is not controlled by an add-on control device (i.e., you are complying with organic HAP content limits, application equipment requirements, or MACT model point value averaging provisions), you must keep the records specified in paragraphs (c)(1) through (3) of this section.

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

(2) The total amount of each aluminum coating used per month (including primers, top coats, clear coats, thinners, and activators) and the weighted-average organic HAP content as determined in §63.5752.

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

(d) If your facility has an add-on control device, you must keep the records specified in §63.10(b) relative to control device startup, shut down, and malfunction events; control device performance tests; and continuous monitoring system performance evaluations.

§ 63.5770 In what form and for how long must I keep my records?

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

(b) You must keep each record for 5 years following the date that each record is generated.

(c) You must keep each record on site for at least 2 years after the date that each record is generated. You can keep the records offsite for the remaining 3 years.

(d) You can keep the records on paper or an alternative media, such as microfilm, computer, computer disks, magnetic tapes, or on microfiche.

Other Information You Need To Know

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

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

§ 63.5776 Who implements and enforces this subpart?

(a) If the Administrator has delegated authority to your State or local agency, the State or local agency has the authority to implement and enforce this subpart.

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

(1) Under §63.6(g), the authority to approve alternatives to the standards listed in paragraphs (b)(1)(i) through (vii) of this section is not delegated.

(i) §63.5698—Emission limit for open molding resin and gel coat operations.

(ii) §63.5728—Standards for closed molding resin operations.

(iii) §63.5731(a)—Standards for resin and gel coat mixing operations.

(iv) §63.5734—Standards for resin and gel coat application equipment cleaning operations.

(v) §63.5740(a)—Emission limit for carpet and fabric adhesive operations.

(vi) §63.5743—Standards for aluminum recreational boat surface coating operations.

(vii) §63.5746(g)—Approval of alternative means of demonstrating compliance with the emission limits for aluminum recreational boat surface coating operations.

(2) Under §63.7(e)(2)(ii) and (f), the authority to approve alternatives to the test methods listed in paragraphs (b)(2)(i) through (iv) of this section is not delegated.

(i) §63.5719(b)—Method for determining whether an enclosure is a total enclosure.

(ii) §63.5719(c)—Methods for measuring emissions from a control device.

(iii) §63.5725(d)(1)—Performance specifications for thermal oxidizer combustion temperature monitors.

(iv) §63.5758—Method for determining hazardous air pollutant content of regulated materials.

(3) Under §63.8(f), the authority to approve major alternatives to the monitoring requirements listed in §63.5725 is not delegated. A “major alternative” is defined in §63.90.

(4) Under §63.10(f), the authority to approve major alternatives to the reporting and recordkeeping requirements listed in §§63.5764, 63.5767, and 63.5770 is not delegated. A “major alternative” is defined in §63.90.

Definitions

§ 63.5779 What definitions apply to this subpart?

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Closed molding means any molding process in which pressure is used to distribute the resin through the reinforcing fabric placed between two mold surfaces to either saturate the fabric or fill the mold cavity. The pressure may be clamping pressure, fluid pressure, atmospheric pressure, or vacuum pressure used either alone or in combination. The mold surfaces may be rigid or flexible. Closed molding includes, but is not limited to, compression molding with sheet molding compound, infusion molding, resin injection molding

(RIM), vacuum-assisted resin transfer molding (VARTM), resin transfer molding (RTM), and vacuum-assisted compression molding. Processes in which a closed mold is used only to compact saturated fabric or remove air or excess resin from the fabric (such as in vacuum bagging), are not considered closed molding. Open molding steps, such as application of a gel coat or skin coat layer by conventional open molding prior to a closed molding process, are not closed molding.

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

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

(1) Fails to meet any requirement or obligation established by this subpart, including, but not limited to, any emission limit, operating limit, or work practice requirement;

(2) Fails to meet any term or condition which is adopted to implement an applicable requirement in this subpart and which is included in the operating permit for any affected source required to obtain such permit; or

(3) Fails to meet any emission limit, operating limit, or work practice requirement in this subpart during any startup, shutdown, or malfunction, regardless of whether or not such failure is permitted by this subpart.

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

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

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

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

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

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

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

Hazardous air pollutant data sheet (HDS) means documentation furnished by a material supplier or an outside laboratory to provide the organic HAP content of the material by weight, measured using an EPA Method, manufacturer's formulation data, or an equivalent method. For aluminum coatings, the HDS also documents the solids content by volume, determined from the manufacturer's formulation data. The purpose of the HDS is to help the affected source in showing compliance with the organic HAP content limits contained in this subpart. The HDS must state the maximum total organic HAP concentration, by weight, of the material. It must include any organic HAP concentrations equal to or greater than 0.1 percent by weight

for individual organic HAP that are carcinogens, as defined by the Occupational Safety and Health Administration Hazard Communication Standard (29 CFR part 1910), and 1.0 percent by weight for all other individual organic HAP, as formulated. The HDS must also include test conditions if EPA Method 311 is used for determining organic HAP content.

Maximum achievable control technology (MACT) model point value means a number calculated for open molding operations that is a surrogate for emissions and is used to determine if your open molding operations are in compliance with the provisions of this subpart. The units for MACT model point values are kilograms of organic HAP per megagram of resin or gel coat applied.

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

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

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

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

Month means a calendar month.

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

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

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

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

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

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

Research and development activities means:

(1) Activities conducted at a laboratory to analyze air, soil, water, waste, or product samples for contaminants, environmental impact, or quality control;

(2) Activities conducted to test more efficient production processes or methods for preventing or reducing adverse environmental impacts, provided that the activities do not include the production of an intermediate or final product for sale or exchange for commercial profit, except in a *de minimis* manner; and

(3) Activities conducted at a research or laboratory facility that is operated under the close supervision of technically trained personnel, the primary purpose of which is to conduct research and development into new processes and products and that is not engaged in the manufacture of products for sale or exchange for commercial profit, except in a *de minimis* manner.

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

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

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

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

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

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

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

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

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

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

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

Table 1 to Subpart VVVV of Part 63—Compliance Dates for New and Existing Boat Manufacturing Facilities

As specified in §63.5695, you must comply by the dates in the following table:

If your facility is—	And—	Then you must comply by this date—
1. An existing source	Is a major source on or before August 22, 2001[1]	August 23, 2004.
2. An existng or new	Becomes a major source after	1 year after becoming a major source or August

area source	August 22, 2001[1]	22, 2002, whichever is later.
3. A new source	Is a major source at startup[1]	Upon startup or August 22, 2001, whichever is later.

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

Table 2 to Subpart VVVV of Part 63—Alternative Organic HAP Content Requirements for Open Molding Resin and Gel Coat Operations

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

For this operation—	And this application method—	You must not exceed this weighted-average organic HAP content (weight percent) requirement—
1. Production resin operations	Atomized (spray)	28 percent.
2. Production resin operations	Nonatomized (nonspray)	35 percent.
3. Pigmented gel coat operations	Any method	33 percent.
4. Clear gel coat operations	Any method	48 percent
5. Tooling resin operations	Atomized (spray)	30 percent.
6. Tooling resin operations	Nonatomized (nonspray)	39 percent.
7. Tooling gel coat operations	Any method	40 percent.

Table 3 to Subpart VVVV of Part 63—MACT Model Point Value Formulas for Open Molding Operations[1]

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

For this operation—	And this application method—	Use this formula to calculate the MACT model plant value for each resin and gel coat—
1. Production resin, tooling resin	a. Atomized	$0.014 \times (\text{Resin HAP\%})^{2.425}$
	b. Atomized, plus vacuum bagging with roll-out	$0.01185 \times (\text{Resin HAP\%})^{2.425}$
	c. Atomized, plus vacuum bagging without roll-out	$0.00945 \times (\text{Resin HAP\%})^{2.425}$

	d. Nonatomized	0.014 × (Resin HAP%)$^{2.275}$
	e. Nonatomized, plus vaccum bagging with roll-out	0.0110 × (Resin HAP%)$^{2.275}$
	f. Nonatomized, plus vacuum bagging without roll-out	0.0076 × (Resin HAP%)$^{2.275}$
2. Pigmented gel coat, clear gel coat, tooling gel coat	All methods	0.445 × (Gel coat HAP%)$^{1.675}$

[1]Equations calculate MACT model point value in kilograms of organic HAP per megagrams of resin or gel coat applied. The equations for vacuum bagging with roll-out are applicable when a facility rolls out the applied resin and fabric prior to applying the vacuum bagging materials. The equations for vacuum bagging without roll-out are applicable when a facility applies the vacuum bagging materials immediately after resin application without rolling out the resin and fabric. HAP% = organic HAP content as supplied, expressed as a weight-percent value between 0 and 100 percent.

[66 FR 44232, Aug. 22, 2001; 66 FR 50504, Oct. 3, 2001]

Table 4 to Subpart VVVV of Part 63—Operating Limits if Using an Add-on Control Device for Open Molding Operations

As specified in §§63.5715(a) and 63.5725(f)(5), you must meet the operating limits in the following table:

For the following device—	You must meet the following operating limit—	And you must demonstrate continuous compliance with the operating limit by—
1. Thermal oxidizer	The average combustion temperature in any 3-hour period must not fall below the combustion temperature limit established according to §63.5725(d)	a. Collecting the combustion temperature data according to §63.5725(d); b. reducing the data to 3-hour block averages; and c. maintaining the 3-hour average combustion temperature at or above the temperature limit.
2. Other control devices	An operating limit approved by the Administrator according to §63.8(f)	a. Collecting parameter monitoring as approved by the Administrator according to §63.8(f); and b. maintaining the parameters within the operating limits approved according to §63.8(f).
3. Emission capture system that is a PTE according to §63.5719(b)	a. The direction of the air flow at all times must be into the enclosure; and b. in any 3-hour period, either the average facial velocity of air through all natural draft openings in the enclosure must be at least 200 feet per minute; or c. the pressure drop across the enclosure must be at least 0.007 inch H_2O, as established in Method 204 of appendix M to 40 CFR part 51	i. Collecting the direction of air flow, and either the facial velocity of air through all natural draft openings according to §63.5725(f)(3) or the pressure drop across the enclosure according to §63.5725(f)(4); and ii. reducing the data for facial velocity or pressure drop to 3-hour block averages; and iii. maintaining the 3-hour average facial velocity of air flow through all natural draft openings or the pressure drop at or above the facial velocity limit or pressure drop limit, and maintaining the direction of air flow into the enclosure at all times.
4. Emission capture system that is not a PTE	a. The average gas volumetric flow rate or duct static pressure in each duct between a capture device and add-on control device	i. Collecting the gas volumetric flow rate or duct static pressure for each capture device according to §63.5725(f)(1) and (3); ii.

according to §63.5719(b)	inlet in any 3-hour period must not fall below the average volumetric flow rate or duct static pressure limit established for that capture device according to §63.5725(f)(5); and b. the average pressure drop across an opening in each enclosure in any 3-hour period must not fall below the average pressure drop limit established for that capture device according to §63.5725(f)(5)	reducing the data to 3-hour block averages; iii. maintaining the 3-hour average gas volumetric flow rate or duct static pressure for each capture device at or above the gas volumetric flow rate or duct static pressure limit; iv. collecting data for the pressure drop across an opening in each enclosure according to §63.5725(f)(2) and (4); v. reducing the data to 3-hour block averages; and vi. maintaining the 3-hour average pressure drop across the opening for each enclosure at or above the gas volumetric flow rate or duct static pressure limit.

Table 5 to Subpart VVVV of Part 63—Default Organic HAP Contents of Solvents and Solvent Blends

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

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

17. Hydrotreated light distillate	64742–47–8	0.1	Toluene.
18. Stoddard solvent	8052–41–3	1	Xylenes.
19. Super high-flash naphtha	64742–95–6	5	Xylenes.
20. Varol®solvent	8052–49–3	1	0.5% xylenes, 0.5% ethyl benzene.
21. VM & P naphtha	64742–89–8	6	3% toluene, 3% xylene.
22. Petroleum distillate mixture	68477–31–6	8	4% naphthalene, 4% biphenyl.

Table 6 to Subpart VVVV of Part 63—Default Organic HAP Contents of Petroleum Solvent Groups

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

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

Table 7 to Subpart VVVV of Part 63—Applicability and Timing of Notifications

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

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

control device	conduct a performance test as specified in §63.9(e)	§63.9(e).
	b. A notification of the date for the continuous monitoring system performance evaluation as specified in §63.9(g)	With the notification of intent to conduct a performance test.
	c. A notification of compliance status as specified in §63.9(h)	No later than 60 calendar days after the completion of the add-on control device performance test and continuous monitoring system performance evaluation.

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

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

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

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

§63.8(b)(2)–(3)	Multiple Effluents and Multiple Continuous Monitoring Systems (CMS)	Yes	Applies to sources that use a CMS on the control device stack.
§63.8(c)(1)–(4)	Continuous Monitoring System Operation and Maintenance	Yes.	
§63.8(c)(5)	Continuous Opacity Monitoring Systems (COMS)	No	Subpart VVVV does not have opacity or visible emission standards.
§63.8(c)(6)–(8)	Continuous Monitoring System Calibration Checks and Out-of-Control Periods	Yes.	
§63.8(d)	Quality Control Program	Yes.	
§63.8(e)	CMS Performance Evaluation	Yes.	
§63.8(f)(1)–(5)	Use of an Alternative Monitoring Method	Yes.	
§63.8(f)(6)	Alternative to Relative Accuracy Test	Yes	Applies only to sources that use continuous emission monitoring systems (CEMS).
§63.8(g)	Data Reduction	Yes	
§63.9(a)	Notification Requirements—Applicability	Yes.	
§63.9(b)	Initial Notifications	Yes	
§63.9(c)	Request for Compliance Extension	Yes.	
§63.9(d)	Notification That a New Source Is Subject to Special Compliance Requirements	Yes.	
§63.9(e)	Notification of Performance Test	Yes	Applies only to sources with add-on controls.
§63.9(f)	Notification of Visible Emissions/Opacity Test	No	Subpart VVVV does not have opacity or visible emission standards.
§63.9(g)(1)	Additional CMS Notifications—Date of CMS Performance Evaluation	Yes	Applies only to sources with add-on controls.
§63.9(g)(2)	Use of COMS Data	No	Subpart VVVV does not require the use of COMS.
§63.9(g)(3)	Alternative to Relative Accuracy Testing	Yes	Applies only to sources with CEMS.
§63.9(h)	Notification of Compliance Status	Yes.	
§63.9(i)	Adjustment of Deadlines	Yes.	
§63.9(j)	Change in Previous Information	Yes.	
§63.10(a)	Recordkeeping/Reporting—Applicability	Yes.	
§63.10(b)(1)	General Recordkeeping Requirements	Yes	§§63.567 and 63.5770 specify additional recordkeeping requirements.
§63.10(b)(2)(i)–(xi)	Recordkeeping Relevant to Startup, Shutdown, and Malfunction Periods	Yes	Applies only to sources with add-on controls.

	and CMS		
§63.10(b)(2)(xii)–(xiv)	General Recordkeeping Requirements	Yes.	
§63.10(b)(3)	Recordkeeping Requirements for Applicability Determinations	Yes	§63.5686 specifies applicability determinations for non-major sources.
§63.10(c)	Additional Recordkeeping for Sources with CMS	Yes	Applies only to sources with add-on controls.
§63.10(d)(1)	General Reporting Requirements	Yes	§63.5764 specifies additional reporting requirements.
§63.10(d)(2)	Performance Test Results	Yes	§63.5764 specifies additional requirements for reporting performance test results.
§63.10(d)(3)	Opacity or Visible Emissions Observations	No	Subpart VVVV does not specify opacity or visible emission standards.
§63.10(d)(4)	Progress Reports for Sources with Compliance Extensions	Yes.	
§63.10(d)(5)	Startup, Shutdown, and Malfunction Reports	Yes	Applies only to sources with add-on controls.
§63.10(e)(1)	Additional CMS Reports—General	Yes	Applies only to sources with add-on controls.
§63.10(e)(2)	Reporting Results of CMS Performance Evaluations	Yes	Applies only to sources with add-on controls.
§63.10(e)(3)	Excess Emissions/CMS Performance Reports	Yes	Applies only to sources with add-on controls.
§63.10(e)(4)	COMS Data Reports	No	Subpart VVVV does not specify opacity or visible emission standards.
§63.10(f)	Recordkeeping/Reporting Waiver	Yes.	
§63.11	Control Device Requirements—Applicability	No	Facilities subject to subpart VVVV do not use flares as control devices.
§63.12	State Authority and Delegations	Yes	§63.5776 lists those sections of subpart A that are not delegated.
§63.13	Addresses	Yes.	
§63.14	Incorporation by Reference	Yes.	
§63.15	Availability of Information/Confidentiality	Yes.	

Indiana Department of Environmental Management
Office of Air Quality

Addendum to the Technical Support Document (ATSD) for a Significant Source Modification and Significant Permit Modification

Source Background and Description

Source Name:	**Smoker Craft, Inc.**
Source Location:	**68143 Clunette Street, New Paris, IN 46553**
County:	**Elkhart**
SIC Code:	**3732**
Operating Permit No.:	**T039-18527-00073**
Operating Permit Issuance Date:	**January 18, 2005**
Significant Source Revision No.:	**089-26311-00073**
Significant Permit Revision No.:	**089-26375-00073**
Permit Reviewer:	**John Haney**

On May 14, 2008, the Office of Air Quality (OAQ) had a notice published in the Elkhart Truth, Elkhart, Indiana, stating that Smoker Craft, Inc. had applied for a significant source modification and significant permit modification to construct and operate four (4) surface coating booths. The notice also stated that the OAQ proposed to issue a significant source modification and significant permit modification for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Comments and Responses

No comments were received during the public notice period.

Additional Changes

IDEM, OAQ has decided to make additional revisions to the permit as described below, with deleted language as ~~strikeouts~~ and new language **bolded**.

1. *Section B.10 has been revised to state the ACC submittal date as April 15th of each year for Elkhart County.*

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~~ **April 15** of each year to:

...

2. Section D.1 contains facilities that are subject to the aluminum boat surface coating requirements of Subpart VVVV. Section D.1 has been revised to reference Subpart VVVV.

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.

(i) Four (4) surface coating booths using HVLP spray guns, identified as 6-3PB, 6-4PB, 6-5PB, and 6-6PB, with emissions controlled by dry filters and exhausting through stacks 6-3, 6-4, 6-5, and 6-6, respectively. Booths 6-3PB, 6-4PB, 6-5PB, and 6-6PB were approved for construction in 2008.

Under 40 CFR 63, Subpart VVVV, this fiberglass and aluminum boat manufacturing plant is considered an existing affected source.

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

3. All of the Subpart VVVV related conditions have been relocated to a new Section E and an Attachment A that cover Subpart VVVV and contains all of the equipment listed in the D.1 and D.2 facility descriptions. The remaining articles of Section D.2 have been renumbered accordingly. Section D.2 has been revised to reference Subpart VVVV.

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.

Under 40 CFR 63, Subpart VVVV, this fiberglass and aluminum boat manufacturing plant is considered an existing affected source.

(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 and SSM 039-26311-00073, 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, in combination with the usage limit in D.1.1, is required to limit the potential to emit of VOC to less than 250 tons per 12 consecutive month period. Compliance with these limits make 326 IAC 2-2 (PSD) not applicable to the emission units constructed in 1998, 1992, 1993, 1996, and 2008.

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:~~

~~HAP limit = [46(M_R) + 159 (M_{PG}) + 291(M_{CG}) + 54(M_{TR}) + 214(M_{TG})] (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~~**4** 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~~**5** 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~~**6** 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~~**7** 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~~**8** 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:~~

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

~~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:~~

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

~~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:~~

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

~~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~~**9** 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~~**10** 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~~**7** and D.2.~~19~~**9**, 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)~~ **(c)** Pursuant to 326 IAC 20-48-4, and in order to comply with Condition D.2.~~11~~**6**, 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)~~ **(d)** 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~~**11** 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 E.1 FACILITY OPERATION CONDITIONS

Emissions Unit Description:

(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.

(i) Four (4) surface coating booths using HVLP spray guns, identified as 6-3PB, 6-4PB, 6-5PB, and 6-6PB, with emissions controlled by dry filters and exhausting through stacks 6-3, 6-4, 6-5, and 6-6, respectively. Booths 6-3PB, 6-4PB, 6-5PB, and 6-6PB were approved for construction in 2008.

Specifically Regulated 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]

(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]

Under 40 CFR 63, Subpart VVVV, this fiberglass and aluminum boat manufacturing plant is considered an existing affected source.

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

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

E.1.1 General Provisions Relating to NESHAP [326 IAC 20-1] [40 CFR Part 63, Subpart A]

(a) Pursuant to 40 CFR 63.5686, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1, as specified in Table 15 of 40 CFR Part 63, Subpart VVVV in accordance with schedule in 40 CFR 63 Subpart VVVV.

(b) Pursuant to 40 CFR 63.10, the Permittee shall submit all required notifications and reports 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

E.1.2 National Emissions Standards for Hazardous Air Pollutants for Boat Manufacturing [40 CFR Part 63, Subpart VVVV] [326 IAC 20-48]

The Permittee shall comply with the following provisions of 40 CFR 63, Subpart VVVV (included as Attachment A of the permit), which are incorporated by reference in 326 IAC 20-48:

(1) 40 CFR 63.5698;
(2) 40 CFR 63.5713;
(3) 40 CFR 63.5731;
(4) 40 CFR 63.5734;
(5) 40 CFR 63.5737;
(6) 40 CFR 63.5740;
(7) 40 CFR 63.5743;
(8) 40 CFR 63.5746;
(9) 40 CFR 63.5753;
(10) 40 CFR 63.5755;

(11) 40 CFR 63.5758;
(12) 40 CFR 63.5761;
(13) 40 CFR 63.5764; and
(14) 40 CFR 63.5767.

IDEM Contact

(a) Questions regarding this proposed significant source modification and significant permit modification can be directed to John Haney at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-5328 or toll free at 1-800-451-6027 extension (4-5328).

(b) A copy of the permit is available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/

(c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.idem.in.gov

Indiana Department of Environmental Management
Office of Air Quality

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

Source Description and Location

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**
Significant Source Modification No.:	**039-26311-00073**
Significant Permit Modification No.:	**039-26375-00073**
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; and

(b) Second Administrative Amendment No. 039-26115-00073**,** issued on April 3, 2008.

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.

*These documents are incorporated by reference. Copies referenced in this section may be obtained from the Government Printing Office, 732 North Capitol Street NW, Washington, D.C. 20401 or are available for review and copying at the Indiana Department of Environmental Management, Office of Air Quality, Indiana Government Center-North, Tenth Floor, 100 North Senate Avenue, Indianapolis, Indiana 46204. *(Air Pollution Control Board; 326 IAC 1-4-21; filed Dec 26, 2007, 1:43 p.m.: 20080123-IR-326070308FRA)*

(a) Ozone Standards

(1) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 revoking the one-hour ozone standard in Indiana.

(2) On September 6, 2007, the Indiana Air Pollution Control Board finalized a temporary emergency rule to re-designate Allen, Clark, Elkhart, Floyd, LaPorte,

and St. Joseph 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 (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to ozone. Elkhart County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) PM2.5
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 applicability.

Source Status

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

Pollutant	**Emissions** (ton/yr)
PM	greater than 60
PM_{10}	greater than 60
SO_2	---
VOC	less than 250
CO	---
NO_x	---
Single HAP	greater than 10
Total HAPs	greater than 25

(a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1).

(b) This existing source is a major source of HAPs, as defined in 40 CFR 63.41, because HAP emissions are greater than ten (10) tons per year for a single HAP and greater than twenty-five (25) tons per year for a combination of HAPs. Therefore, this source is a major source under Section 112 of the Clean Air Act (CAA).

Description of Proposed Modification

The Office of Air Quality (OAQ) has reviewed a modification application, submitted by Smoker Craft, Inc. on March 25, 2008, relating to the addition of four (4) surface coating booths. The following is a list of the proposed emission units and pollution control devices:

(i) Four (4) surface coating booths using HVLP spray guns, identified as 6-3PB, 6-4PB, 6-5PB, and 6-6PB, with emissions controlled by dry filters and exhausting through stacks 6-3, 6-4, 6-5, and 6-6, respectively. Booths 6-3PB, 6-4PB, 6-5PB, and 6-6PB were approved for construction in 2008.

Enforcement Issues

There are no pending enforcement actions related to this modification.

Stack Summary

Stack ID	Operation	Height (ft)	Diameter (ft)	Flow Rate (acfm)	Temperature (^{0}F)
6-3	Surface Coating Booth 6-3PB	31	2.5	10955	77
6-4	Surface Coating Booth 6-4PB	31	2.5	10955	77
6-5	Surface Coating Booth 6-5PB	31	2.5	10955	77
6-6	Surface Coating Booth 6-6PB	31	2.5	10955	77

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

PTE Before Controls of the Modification	
Pollutant	**Potential To Emit** (ton/yr)
PM	17.70
PM_{10}	17.70
SO_2	0.00
VOC	106.35
CO	0.00
NO_X	0.00

HAP PTE Before Controls of the Modification	
HAP	**Potential To Emit** (ton/yr)
Xylene	60.18
Naphthalene	0.57
Chromium	1.49
TOTAL HAPs	62.24

This source modification is subject to 326 IAC 2-7-10.5(f)(4) because the potential to emit volatile organic compounds (VOC) is greater than twenty-five (25) tons per year before control. Additionally, the modification will be incorporated into the Part 70 Operating Permit through a significant permit modification issued pursuant to 326 IAC 2-7-12(d), because the modification requires a case-by-case determination of an emission limitation or other standard and requires significant changes in existing monitoring Part 70 permit terms and conditions.

Permit Level Determination – PSD

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

	Potential to Emit (ton/yr)							
Process / Emission Unit	**PM**	**PM_{10}**	**SO_2**	**VOC**	**CO**	**NO_X**	**Single HAP (xylene)**	**Total HAP**
Coating Booths 6-3PB, 6-4PB, 6-5PB, & 6-6PB	1.83	1.83	---	106.35	---	---	60.18	62.24
Existing Permitted Equipment	>60	>60	---	<250	---	---	>10	>25
Total for Source	>61.83, but <250	>61.83, but <250	---	<250	---	---	---	---
PSD Major Source Threshold Level	250	250	NA	250	NA	NA	---	---

This source has elected to limit the potential to emit of this modification as follows:

(a) Pursuant to Operating Permit 039-7570-00073 and SSM 039-26311-00073, 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. These limits may be found in D.1.1 and D.2.1 of the permit.

This modification to an existing minor stationary source is not major because the emissions increase is less than the PSD major source thresholds. Compliance with these emission limits will ensure that the potential to emit from this modification is less than two hundred and fifty (250) tons of VOC per year and therefore will render the requirements of 326 IAC 2-2 not applicable.

Federal Rule Applicability Determination

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

NSPS:

(a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and

40 CFR Part 60) applicable to this proposed modification.

NESHAP:

(b) This source is not subject to the National Emission Standards for Hazardous Air Pollutants for Miscellaneous Metal Parts and Products (40 CFR 63.3880, Subpart MMMM) because this subpart does not apply to surface coating of boats or metal parts of boats where the facility meets the applicability criteria for boat manufacturing facilities (subpart VVVV of this part). This subpart does apply to metal coating operations performed on personal watercraft; however, this source is not subject because it will not coat personal watercraft(s) as defined in 40 CFR 63.3981. *Personal watercraft* means a vessel (boat) which uses an inboard motor powering a water jet pump as its primary source of motive power and which is designed to be operated by a person or persons sitting, standing, or kneeling on the vessel, rather than in the conventional manner of sitting or standing inside the vessel.

(c) This source is subject to the National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing (40 CFR 63.5680, Subpart VVVV), which is incorporated by reference as 326 IAC 20-48. The four (4) surface coating booths using HVLP spray guns, identified as 6-3PB, 6-4PB, 6-5PB, and 6-6PB, are subject to the National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing, (40 CFR 63.5680, Subpart VVVV) because the source is a major source of HAPs and the coating booths are used to manufacture boats.

Pursuant to 40 CFR 63.5683 and 40 CFR 63.5689, the affected source that is subject to the requirements of 40 CFR 63, Subpart VVVV consists of all facilities located at the source engaged in the following operations:

(1) Open molding resin and gel coat operations (including pigmented gel coat, clear gel coat, production resin, tooling gel coat, and tooling resin).

(2) Closed molding resin operations.

(3) Resin and gel coat mixing operations.

(4) Resin and gel coat application equipment cleaning operations.

(5) Carpet and fabric adhesive operations.

(6) Aluminum hull and deck coating operations, including solvent wipedown operations and paint spray gun cleaning operations, on aluminum recreational boats.

The specific facilities include the following:

(1) Four (4) surface coating booths using HVLP spray guns, identified as 6-3PB, 6-4PB, 6-5PB, and 6-6PB, with emissions controlled by dry filters and exhausting through stacks 6-3, 6-4, 6-5, and 6-6, respectively. Booths 6-3PB, 6-4PB, 6-5PB, and 6-6PB were approved for construction in 2008.

Pursuant to 40 CFR 63.5743(a)(2), the Permittee has chosen to comply with the requirements of 40 CFR 63, Subpart VVVV by meeting the organic HAP emission limit for the four (4) surface coating booths. See Appendix A of this Technical Support Document for detailed emission calculations.

Nonapplicable portions of the NESHAP will not be included in the permit. The four (4) surface coating booths using HVLP spray guns, identified as 6-3PB, 6-4PB, 6-5PB, and 6-6PB, are subject to the following portions of Subpart VVVV:

(1) 40 CFR 63.5743,
(2) 40 CFR 63.5746,
(3) 40 CFR 63.5752,

(4) 40 CFR 63.5753,
(5) 40 CFR 63.5755,
(6) 40 CFR 63.5758,
(7) 40 CFR 63.5761,
(8) 40 CFR 63.5764,
(9) 40 CFR 63.5767,
(10) 40 CFR 63.5770,
(11) 40 CFR 63.5773,
(12) 40 CFR 63.5776, and
(13) 40 CFR 63.5779.

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

(d) 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.

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

CAM Applicability Analysis							
Emission Unit	**Control Device Used**	**Emission Limitation** (Y/N)	**Uncontrolled PTE** (ton/yr)	**Controlled PTE** (ton/yr)	**Part 70 Major Source Threshold** (ton/yr)	**CAM Applicable** (Y/N)	**Large Unit** (Y/N)
Surface Coating Booths (6-3PB to 6-6PB) - PM	Dry filter	Y	17.70	1.83	100	N	N
Surface Coating Booths (6-3PB to 6-6PB) - PM10	Dry filter	Y	17.70	1.83	100	N	N

Based on this evaluation, the requirements of 40 CFR Part 64, CAM are 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 2-2 (PSD)
This modification to an existing minor stationary source is not major because this source has elected to limit the potential to emit of this modification to less than the PSD major source thresholds. Compliance with these emission limits will ensure that the potential to emit from this modification is less than two hundred and fifty (250) tons of VOC per year and therefore will render the requirements of 326 IAC 2-2 not applicable.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The operation of the four (4) surface coating booths using HVLP spray guns, identified as 6-3PB, 6-4PB, 6-5PB, and 6-6PB, will emit greater than ten (10) tons per year for a single HAP and greater than twenty-five (25) tons per year for a combination of HAPs. Therefore, 326 IAC 2-4.1 would apply to these four (4) coating booths, however, pursuant to 326 IAC 2-4.1-1(b)(2), because these four (4) surface coating booths are specifically regulated by NESHAP 40 CFR 63, Subpart VVVV, which was issued pursuant to Section 112(d) of the CAA, these four (4) surface coating booths are exempt from the requirements of 326 2-4.1.

326 IAC 2-6 (Emission Reporting)
Since this source is required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program, this source is subject to 326 IAC 2-6 (Emission Reporting). In accordance with the compliance schedule in 326 IAC 2-6-3, an emission statement must be submitted triennially. The first report is due no later than July 1, 2007, and subsequent reports are due every three (3) years thereafter. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-2(d), the dry filters shall be in operation at all times one or more of the coating booths are operation.

326 IAC 8-1-6 (New Facilities: General Reduction Requirements)
The four (4) surface coating booths using HVLP spray guns, identified as 6-3PB, 6-4PB, 6-5PB, and 6-6PB, are otherwise regulated by 326 IAC 20-48. Therefore, the requirements of 326 IAC 8-1-6 are not applicable to these emission units.

326 IAC 8-2-9 (Miscellaneous Metal Coating)
Pursuant to 326 IAC 8-2-9(b)(5), these facilities are exempt from the requirements of 326 IAC 8-2-9 because these four (4) surface coating booths apply surface coatings only to the exterior, non-enclosed surfaces of the marine vessels (recreational boats) manufactured at this source.

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 four (4) surface coating booths using HVLP spray guns, identified as 6-3PB, 6-4PB, 6-5PB, and 6-6PB, have applicable compliance determination conditions as specified below:

(1) Compliance with the VOC content and usage limitations shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data

sheets. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

(2) The Permittee is not required to perform compliance stack tests on the coating booths for VOC emissions because there are no VOC control devices in operation and records must be kept of all VOCs used at the source.

(3) The Permittee is not required to perform compliance stack tests on the coating booths for PM/PM10 emissions because each coating booth accounts for a small percentage of the total PTE for PM/PM10 from the entire source.

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

(b) The four (4) surface coating booths using HVLP spray guns, identified as 6-3PB, 6-4PB, 6-5PB, and 6-6PB, have applicable compliance monitoring conditions as specified below:

(1) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters controlling the paint booths. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks while one or more of the booths are in operation.

(2) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground.

These monitoring conditions are necessary because the dry filters for the coating booths must operate properly to ensure compliance with 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) and 326 IAC 2-7-5(3) (Permit Content).

Proposed Changes

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

(a) Since Elkhart County is attainment for all criteria pollutants, Emission Offset Rules do not apply. Section A.1 has been revised accordingly.

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

(b) 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 ~~46206-6015~~ **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 ~~46206-6015~~ **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 ~~46206-6015~~ **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 ~~46206-6015~~ **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 ~~46206-6015~~ **46204-2251**

(c) Four (4) surface coating booths have been added to the facility. Sections A.2, D.1, and the Table of Contents have been revised. Section D.1.3 - Particulate Matter (40 CFR 52, Subpart P) no longer pertains to surface coating operations. It has been replaced with 326 IAC 6-3-2(d), which is already listed in the permit. Section D.1.3 has been removed, and all subsequent D.1 sections have been renumbered.

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:

...

(i) Four (4) surface coating booths using HVLP spray guns, identified as 6-3PB, 6-4PB, 6-5PB, and 6-6PB, with emissions controlled by dry filters and exhausting through stacks 6-3, 6-4, 6-5, and 6-6, respectively. Booths 6-3PB, 6-4PB, 6-5PB, and 6-6PB were approved for construction in 2008.

SECTION D.1 FACILITY OPERATION CONDITIONS

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

...

(i) Four (4) surface coating booths using HVLP spray guns, identified as 6-3PB, 6-4PB, 6-5PB, and 6-6PB, with emissions controlled by dry filters and exhausting through stacks 6-3, 6-4, 6-5, and 6-6, respectively. Booths 6-3PB, 6-4PB, 6-5PB, and 6-6PB were approved for construction in 2008.

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

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

Pursuant to Operating Permit 039-7570-00073, ~~issued on August 25, 1999,~~ **and SSM 039-26311-00073,** 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**, in combination with the usage limit in D.2.1,** 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~~ **these limits make** 326 IAC 2-2 (**PSD** ~~Prevention of Significant Deterioration~~) not applicable to the emission units constructed in 1998, 1992, 1993, ~~and~~ 1996, **and 2008**.

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]~~

~~(a) 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~~ **3** 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, **6-3PB, 6-4PB, 6-5PB, 6-6PB,** 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~~ **4** 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~~ **5** 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~~ **6** 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, **6-3PB, 6-4PB, 6-5PB, 6-6PB,** 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, **6-3, 6-4, 6-5, 6-6,** 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~~ **7** 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~~ **8** 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).

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

Pursuant to Operating Permit 039-7570-00073, ~~issued on August 25, 1999,~~ **and SSM 039-26311-00073,** 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**, in combination with the usage limit in D.2.1,** 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~~ **these limits make** 326 IAC 2-2 (**PSD** ~~Prevention of Significant Deterioration~~) not applicable to the emission units constructed in 1998, 1992, 1993, ~~and~~ 1996, **and 2008**.

Conclusion and Recommendation

The construction and operation of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Source Modification No. 039-26311-00073 and Significant Permit Modification No. 039-26375-00073, respectively. The staff recommends to the Commissioner that this Part 70 Significant Source and Significant Permit Modification be approved.

Appendix A: Emissions Calculations
Summary Emissions

Company Name: Smoker Craft, Inc.
Address City IN Zip: 68143 Clunette Street, New Paris, Indiana 46553
Reviewer: D&B Environmental Services, Inc.
Date: March 13, 2008

PRECONTROL EMISSION RATES

Emission Units	PM	PM10	SO_2	NOx	VOC	CO	* Highest Single HAP	Combined HAP
Surface Coating Booth 6-3PB	4.42	4.42	0.00	0.00	26.59	0.00	15.06	15.59
Surface Coating Booth 6-4PB	4.42	4.42	0.00	0.00	26.59	0.00	15.06	15.59
Surface Coating Booth 6-5PB	4.42	4.42	0.00	0.00	26.59	0.00	15.06	15.59
Surface Coating Booth 6-6PB	4.42	4.42	0.00	0.00	26.59	0.00	15.06	15.59
TOTAL	**17.70**	**17.70**	**0.00**	**0.00**	**106.35**	**0.00**	**60.24**	**62.36**

***Xylene as Determined Below**

Emission Units	Chromium Emissions (ton/yr)	Naphthalene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Xylene Emissions (ton/yr)	Total Emissions (ton/yr)
Surface Coating Booth 6-3PB	0.37	0.14	0.02	15.06	15.59
Surface Coating Booth 6-4PB	0.37	0.14	0.02	15.06	15.59
Surface Coating Booth 6-5PB	0.37	0.14	0.02	15.06	15.59
Surface Coating Booth 6-6PB	0.37	0.14	0.02	15.06	15.59
Total Emissions (TPY) by HAP	**1.49**	**0.57**	**0.06**	**60.24**	**62.36**

Appendix A: Emissions Calculations
Summary Emissions

Company Name: Smoker Craft, Inc.
Address City IN Zip: 68143 Clunette Street, New Paris, Indiana 46553
Reviewer: D&B Environmental Services, Inc.
Date: March 13, 2008

POST CONTROL EMISSION RATES

Emission Units	PM	PM10	SO_2	NOx	VOC	CO	* Highest Single HAP	Combined HAP
Surface Coating Booth 6-3PB	0.46	0.46	0.00	0.00	26.59	0.00	15.06	15.58
Surface Coating Booth 6-4PB	0.46	0.46	0.00	0.00	26.59	0.00	15.06	15.58
Surface Coating Booth 6-5PB	0.46	0.46	0.00	0.00	26.59	0.00	15.06	15.58
Surface Coating Booth 6-6PB	0.46	0.46	0.00	0.00	26.59	0.00	15.06	15.58
TOTAL	**1.83**	**1.83**	**0.00**	**0.00**	**106.35**	**0.00**	**60.24**	**62.30**

***Xylene as Determined Below**

Emission Units	Chromium Emissions (ton/yr)	Naphthalene Emissions (ton/yr)	Xylene Emissions (ton/yr)	Total Emissions (ton/yr)
Surface Coating Booth 6-3PB	0.37	0.14	15.06	15.58
Surface Coating Booth 6-4PB	0.37	0.14	15.06	15.58
Surface Coating Booth 6-5PB	0.37	0.14	15.06	15.58
Surface Coating Booth 6-6PB	0.37	0.14	15.06	15.58
Total Emissions (TPY) by HAP	**1.49**	**0.57**	**60.24**	**62.30**

Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations

Company Name: Smoker Craft, Inc.
Address City IN Zip: 68143 Clunette Street, New Paris, Indiana 46553
Prepared By: D&B Environmental Services, Inc.
Date: March 13, 2008

Booth 6-3PB

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum Production (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Priming Operations																
Wash Primer 6181P	7.79	81.60%	18.05%	63.55%	21.34%	9.80%	0.1250	1.25	6.29	4.95	0.77	18.56	3.39	0.25	50.52	75.00%
Acid Thinner 6182T	6.96	95.83%	0.00%	95.83%	0.00%	1.80%	0.1250	1.25	6.67	6.67	1.04	25.01	4.56	0.05	370.56	75.00%
OR																
Painting Operations																
Biscuit 5994EA	8.61	60.16%	0.00%	60.16%	0.00%	31.00%	0.7500	1.25	5.18	5.18	4.86	116.55	21.27	3.52	16.71	75.00%
Elpolydur Hardener	8.18	56.97%	0.00%	56.97%	0.00%	36.60%	0.1875	1.25	4.66	4.66	1.09	26.21	4.78	0.90	12.73	75.00%
AND																
Cleanup Solvent																
VM&P Naphtha	6.24	100.00%	0.00%	100.00%	0.00%	0.00%	0.0156	1.25	6.24	6.24	0.12	2.93	0.53	0.00	#DIV/0!	100.00%

State Potential Emissions	**Add worst case coating operation to all solvents**	**6.07**	**145.69**	**26.59**	**4.42**
Control Efficiency (Enforceable Limits for VOC and Dry Filters for Overspray Control)		0.00%	0.00%	0.00%	89.64%
Potential Emission Rates After Controls		**6.07**	**145.69**	**26.59**	**0.46**

METHODOLOGY

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

Hazardous Air Pollutants

Material	Density (Lb/Gal)	Gal of Mat. (gal/unit)	Maximum Production (unit/hour)	Weight % Chromium	Weight % Napthalene	Weight % Toluene	Weight % Xylene	Chromium Emissions (tons)	Naphthalene Emissions (tons)	Naphthalene Toluene (tons)	Xylene Emissions (tons)	Total HAP Emissions (tons)
Priming Operations												
Wash Primer 6181P	7.79	0.1250	1.25	7.00%	0.00%	0.00%	0.00%	0.37	0.00	0.00	0.00	0.37
Acid Thinner 6182T	6.96	0.1250	1.25	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00
OR												
Painting Operations												
Biscuit 5994EA	8.61	0.7500	1.25	0.00%	0.40%	0.00%	34.67%	0.00	0.14	0.00	12.26	12.40
Elpolydur Hardener	8.18	0.1875	1.25	0.00%	0.00%	0.00%	33.19%	0.00	0.00	0.00	2.79	2.79
AND												
Cleanup Solvent												
VM&P Naphtha	6.24	0.0156	1.25	0.00%	0.00%	3.00%	3.00%	0.00	0.00	0.02	0.02	0.03
Potential HAP Emissions (tons/year) = Worst HAP Coating Operation + Cleaning Solvent								**0.37**	**0.14**	**0.02**	**15.06**	**15.59**

METHODOLOGY

Potential HAP Tons per Year = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * Weight % HAP * 8760 (hr/yr) * (1 ton/2000 lbs)

Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations

Company Name: Smoker Craft, Inc.
Address City IN Zip: 68143 Clunette Street, New Paris, Indiana 46553
Prepared By: D&B Environmental Services, Inc.
Date: March 13, 2008

Booth 6-4PB

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum Production (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Priming Operations																
Wash Primer 6181P	7.79	81.60%	18.05%	63.55%	21.34%	9.80%	0.1250	1.25	6.29	4.95	0.77	18.56	3.39	0.25	50.52	75.00%
Acid Thinner 6182T	6.96	95.83%	0.00%	95.83%	0.00%	1.80%	0.1250	1.25	6.67	6.67	1.04	25.01	4.56	0.05	370.56	75.00%
OR																
Painting Operations																
Biscuit 5994EA	8.61	60.16%	0.00%	60.16%	0.00%	31.00%	0.7500	1.25	5.18	5.18	4.86	116.55	21.27	3.52	16.71	75.00%
Elpolydur Hardener	8.18	56.97%	0.00%	56.97%	0.00%	36.60%	0.1875	1.25	4.66	4.66	1.09	26.21	4.78	0.90	12.73	75.00%
AND																
Cleanup Solvent																
VM&P Naphtha	6.24	100.00%	0.00%	100.00%	0.00%	0.00%	0.0156	1.25	6.24	6.24	0.12	2.93	0.53	0.00	#DIV/0!	100.00%

State Potential Emissions	**Add worst case coating operation to all solvents**	**6.07**	**145.69**	**26.59**	**4.42**
Control Efficiency (Enforceable Limits for VOC and Dry Filters for Overspray Control)		0.00%	0.00%	0.00%	89.64%
Potential Emission Rates After Controls		**6.07**	**145.69**	**26.59**	**0.46**

METHODOLOGY

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

Hazardous Air Pollutants

Material	Density (Lb/Gal)	Gal of Mat. (gal/unit)	Maximum Production (unit/hour)	Weight % Chromium	Weight % Napthalene	Weight % Toluene	Weight % Xylene	Chromium Emissions (tons)	Naphthalene Emissions (tons)	Naphthalene Toluene (tons)	Xylene Emissions (tons)	Total HAP Emissions (tons)
Priming Operations												
Wash Primer 6181P	7.79	0.1250	1.25	7.00%	0.00%	0.00%	0.00%	0.37	0.00	0.00	0.00	0.37
Acid Thinner 6182T	6.96	0.1250	1.25	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00
OR												
Painting Operations												
Biscuit 5994EA	8.61	0.7500	1.25	0.00%	0.40%	0.00%	34.67%	0.00	0.14	0.00	12.26	12.40
Elpolydur Hardener	8.18	0.1875	1.25	0.00%	0.00%	0.00%	33.19%	0.00	0.00	0.00	2.79	2.79
AND												
Cleanup Solvent												
VM&P Naphtha	6.24	0.0156	1.25	0.00%	0.00%	3.00%	3.00%	0.00	0.00	0.02	0.02	0.03
Potential HAP Emissions (tons/year) = Worst HAP Coating Operation + Cleaning Solvent								**0.37**	**0.14**	**0.02**	**15.06**	**15.59**

METHODOLOGY

Potential HAP Tons per Year = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * Weight % HAP * 8760 (hr/yr) * (1 ton/2000 lbs)

Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations

Company Name: Smoker Craft, Inc.
Address City IN Zip: 68143 Clunette Street, New Paris, Indiana 46553
Prepared By: D&B Environmental Services, Inc.
Date: March 13, 2008

Booth 6-5PB

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum Production (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Priming Operations																
Wash Primer 6181P	7.79	81.60%	18.05%	63.55%	21.34%	9.80%	0.1250	1.25	6.29	4.95	0.77	18.56	3.39	0.25	50.52	75.00%
Acid Thinner 6182T	6.96	95.83%	0.00%	95.83%	0.00%	1.80%	0.1250	1.25	6.67	6.67	1.04	25.01	4.56	0.05	370.56	75.00%
OR																
Painting Operations																
Biscuit 5994EA	8.61	60.16%	0.00%	60.16%	0.00%	31.00%	0.7500	1.25	5.18	5.18	4.86	116.55	21.27	3.52	16.71	75.00%
Elpolydur Hardener	8.18	56.97%	0.00%	56.97%	0.00%	36.60%	0.1875	1.25	4.66	4.66	1.09	26.21	4.78	0.90	12.73	75.00%
AND																
Cleanup Solvent																
VM&P Naphtha	6.24	100.00%	0.00%	100.00%	0.00%	0.00%	0.0156	1.25	6.24	6.24	0.12	2.93	0.53	0.00	#DIV/0!	100.00%

State Potential Emissions	**Add worst case coating operation to all solvents**	**6.07**	**145.69**	**26.59**	**4.42**
Control Efficiency (Enforceable Limits for VOC and Dry Filters for Overspray Control)		0.00%	0.00%	0.00%	89.64%
Potential Emission Rates After Controls		**6.07**	**145.69**	**26.59**	**0.46**

METHODOLOGY

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

Hazardous Air Pollutants

Material	Density (Lb/Gal)	Gal of Mat. (gal/unit)	Maximum Production (unit/hour)	Weight % Chromium	Weight % Napthalene	Weight % Toluene	Weight % Xylene	Chromium Emissions (tons)	Naphthalene Emissions (tons)	Naphthalene Toluene (tons)	Xylene Emissions (tons)	Total HAP Emissions (tons)
Priming Operations												
Wash Primer 6181P	7.79	0.1250	1.25	7.00%	0.00%	0.00%	0.00%	0.37	0.00	0.00	0.00	0.37
Acid Thinner 6182T	6.96	0.1250	1.25	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00
OR												
Painting Operations												
Biscuit 5994EA	8.61	0.7500	1.25	0.00%	0.40%	0.00%	34.67%	0.00	0.14	0.00	12.26	12.40
Elpolydur Hardener	8.18	0.1875	1.25	0.00%	0.00%	0.00%	33.19%	0.00	0.00	0.00	2.79	2.79
AND												
Cleanup Solvent												
VM&P Naphtha	6.24	0.0156	1.25	0.00%	0.00%	3.00%	3.00%	0.00	0.00	0.02	0.02	0.03
Potential HAP Emissions (tons/year) = Worst HAP Coating Operation + Cleaning Solvent								**0.37**	**0.14**	**0.02**	**15.06**	**15.59**

METHODOLOGY

Potential HAP Tons per Year = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * Weight % HAP * 8760 (hr/yr) * (1 ton/2000 lbs)

Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations

Company Name: Smoker Craft, Inc.
Address City IN Zip: 68143 Clunette Street, New Paris, Indiana 46553
Prepared By: D&B Environmental Services, Inc.
Date: March 13, 2008

Booth 6-6PB

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum Production (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Priming Operations																
Wash Primer 6181P	7.79	81.60%	18.05%	63.55%	21.34%	9.80%	0.1250	1.25	6.29	4.95	0.77	18.56	3.39	0.25	50.52	75.00%
Acid Thinner 6182T	6.96	95.83%	0.00%	95.83%	0.00%	1.80%	0.1250	1.25	6.67	6.67	1.04	25.01	4.56	0.05	370.56	75.00%
OR																
Painting Operations																
Biscuit 5994EA	8.61	60.16%	0.00%	60.16%	0.00%	31.00%	0.7500	1.25	5.18	5.18	4.86	116.55	21.27	3.52	16.71	75.00%
Elpolydur Hardener	8.18	56.97%	0.00%	56.97%	0.00%	36.60%	0.1875	1.25	4.66	4.66	1.09	26.21	4.78	0.90	12.73	75.00%
AND																
Cleanup Solvent																
VM&P Naphtha	6.24	100.00%	0.00%	100.00%	0.00%	0.00%	0.0156	1.25	6.24	6.24	0.12	2.93	0.53	0.00	#DIV/0!	100.00%

State Potential Emissions	**Add worst case coating operation to all solvents**	**6.07**	**145.69**	**26.59**	**4.42**
Control Efficiency (Enforceable Limits for VOC and Dry Filters for Overspray Control)		0.00%	0.00%	0.00%	89.64%
Potential Emission Rates After Controls		**6.07**	**145.69**	**26.59**	**0.46**

METHODOLOGY

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

Hazardous Air Pollutants

Material	Density (Lb/Gal)	Gal of Mat. (gal/unit)	Maximum Production (unit/hour)	Weight % Chromium	Weight % Napthalene	Weight % Toluene	Weight % Xylene	Chromium Emissions (tons)	Naphthalene Emissions (tons)	Naphthalene Toluene (tons)	Xylene Emissions (tons)	Total HAP Emissions (tons)
Priming Operations												
Wash Primer 6181P	7.79	0.1250	1.25	7.00%	0.00%	0.00%	0.00%	0.37	0.00	0.00	0.00	0.37
Acid Thinner 6182T	6.96	0.1250	1.25	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00
OR												
Painting Operations												
Biscuit 5994EA	8.61	0.7500	1.25	0.00%	0.40%	0.00%	34.67%	0.00	0.14	0.00	12.26	12.40
Elpolydur Hardener	8.18	0.1875	1.25	0.00%	0.00%	0.00%	33.19%	0.00	0.00	0.00	2.79	2.79
AND												
Cleanup Solvent												
VM&P Naphtha	6.24	0.0156	1.25	0.00%	0.00%	3.00%	3.00%	0.00	0.00	0.02	0.02	0.03
Potential HAP Emissions (tons/year) = Worst HAP Coating Operation + Cleaning Solvent								**0.37**	**0.14**	**0.02**	**15.06**	**15.59**

METHODOLOGY

Potential HAP Tons per Year = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * Weight % HAP * 8760 (hr/yr) * (1 ton/2000 lbs)

Appendix A: Emissions Calculations
40 CFR 63, Subpart VVVV, National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing
Demonstration of Compliance with Applicable NESHAP Limit

Company Name: Smoker Craft, Inc.
Address City IN Zip: 68143 Clunette Street, New Paris, Indiana 46553
Prepared By: D&B Environmental Services, Inc.
Date: March 13, 2008

Four (4) Coating Booths, 6-3PB, 6-4PB, 6-5PB, and 6-6PB

Material	Density (Lb/Gal)	Weight % Napthalene	Weight % Toluene	Weight % Xylene	Weight % Total VHAP	VHAP Content (lb VHAP/gal)	Volume % Non-Volatiles (solids)	Usage (gal/unit)	Maximum Production (unit/hour)	Hourly Usage (gal)	Hourly VHAP Usage (lbs)	Hourly VHAP Usage (Kg)	Hourly Volume Solids Applied (gal)	Hourly Volume Solids Applied (L)
Wash Primer 6181P	7.79	**0.00%**	**0.00%**	**0.00%**	0.00%	0.00	9.80%	0.1250	5.00	0.63	0.00	0.00	0.06	0.23
Acid Thinner 6182T	6.96	**0.00%**	**0.00%**	**0.00%**	0.00%	0.00	1.80%	0.1250	5.00	0.63	0.00	0.00	0.01	0.04
Biscuit 5994EA	8.61	**0.40%**	**0.00%**	**34.67%**	35.07%	3.02	31.00%	0.7500	5.00	3.75	11.32	5.15	1.16	4.40
Elpolydur Hardener	8.18	**0.00%**	**0.00%**	**33.19%**	33.19%	2.71	36.60%	0.1875	5.00	0.94	2.55	1.16	0.34	1.30
VM&P Naphtha	6.24	**0.00%**	**3.00%**	**3.00%**	6.00%	0.37	0.00%	0.0156	5.00	0.08	0.03	0.01	0.00	0.00
Total VHAP (Kg) and Solids Applied (L)												**6.32**		**5.97**
Average VHAP Content (Kg VHAP/L Solids Applied)														**1.06**
Subpart VVVV VHAP Limit Specified in 40 CFR 63.5743(a)(2)														**1.22**

METHODOLOGY

Weight % Total Volatile HAP (VHAP) Content = ∑ Weight % All Volatile HAP(s)
HAP Content (lb VHAP/gal) = Weight % Total VHAP x Density (lb/gal)
Hourly Usage (gal) = Usage (gal/unit) x Maximum Production (units/hour)
Hourly VHAP Usage (lbs) = Hourly Usage (gal) x VHAP Content (lb VHAP/gal)
Hourly VHAP Usage (Kg) = Hourly VHAP Usage (lbs) / 2.2 (lb/Kg)
Hourly Volume Solids Applied (gal) = Volume % Solids x Hourly Usage (gal)
Hourly Volume Solids Applied (L) = Volume Solids Applied (gal) * 3.785 (L/gal)
Average VHAP Content (Kg VHAP/L Solids Applied) = Total VHAP (Kg) / Total Solids Applied (L)