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: May 15, 2009

RE: Gold Shield of Indiana, Inc / 001-27728-00043

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 approval 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) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures
FNPER-MOD.dot 12/3/07

IDEM

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Mr. Haviland
Gold Shield of Indiana, Inc.
2004 Patterson Street
Decatur, IN 46733

May 15, 2009

Re: 001-27728-00043
Minor Source Modification to:
Part 70 Permit No.: T001-25023-00043

Dear Mr. Haviland:

Gold Shield of Indiana, Inc. was issued Part 70 Operating Permit Renewal No. T001-25023-00043 on October 7, 2008, for a custom molded fiberglass reinforced products company. An application to modify the source was received on April 7, 2009. Pursuant to 326 IAC 2-7-10.5, the following emission unit is approved for construction at the source:

One (1) filament winding process, identified as FWP, approved for construction in 2009, with a capacity of 100 pounds of resin per hour, exhausting to general building ventilation.

The following construction conditions are applicable to the proposed project:

General Construction Conditions

1. The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).

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

3. Effective Date of the Permit
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.

4. Pursuant to 326 IAC 2-1.1-9 and 326 IAC 2-7-10.5(i), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

6. Pursuant to 326 IAC 2-7-10.5(l) the emission units constructed under this approval shall not be placed into operation prior to revision of the source's Part 70 Operating Permit to incorporate the required operation conditions.

The source may begin construction when the source modification has been issued. The source must comply with the requirements of 326 IAC 2-7-10.5(l)(2) and 326 IAC 2-7-12 before operation of any of the proposed emission units can begin.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter call (800) 451-6027, and ask for Michael S. Brooks or extension 4-3533, or dial (317) 234-3533.

Sincerely,

Chrystal A. Wagner, Section Chief
Permits Branch
Office of Air Quality

Attachments

MSB

cc: File - Adams County
U.S. EPA, Region V
Adams County Health Department
Compliance and Enforcements Branch

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Part 70 Operating Permit
OFFICE OF AIR QUALITY

Gold Shield of Indiana, Inc.
2004 Patterson Street and 2709 Patterson Street
Decatur, Indiana 46733

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Minor Source Modification No.: 001-27728-00043	
Issued by: Chrystal A. Wagner, Section Chief Permits Branch Office of Air Quality	Issuance Date: May 15, 2009

TABLE OF CONTENTS

A. SOURCE SUMMARY **5**

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

B. GENERAL CONDITIONS **9**

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][326 IAC 2-7-4(a)(1)(D)] [IC 13-15-3-6(a)]
B.3 Term of Conditions [326 IAC 2-1.1-9.5]
B.4 Enforceability [326 IAC 2-7-7]
B.5 Severability [326 IAC 2-7-5(5)]
B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]
B.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]
B.8 Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]
B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]
B.10 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.11 Emergency Provisions [326 IAC 2-7-16]
B.12 Permit Shield [326 IAC 2-7-15][326 IAC 2-7-20][326 IAC 2-7-12]
B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5][326 IAC 2-7-10.5]
B.14 Termination of Right to Operate [326 IAC 2-7-10][326 IAC 2-7-4(a)]
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][326 IAC 2-7-8(e)]
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 13-30-3-1][IC 13-17-3-2]
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 Advanced Source Modification Approval [326 IAC 2-7-5(16)][326 IAC 2-7-10.5]
B.26 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314] [326 IAC 1-1-6]

C. SOURCE OPERATION CONDITIONS **20**

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 Stack Height [326 IAC 1-7]

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]

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]
C.12 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Corrective Actions and Response Steps [326 IAC 2-7-5][326 IAC 2-7-6]
C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]
C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]
C.15 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]
C.16 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.17 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.18 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-2] [326 IAC 2-3]
C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [326 IAC 2-2]

Stratospheric Ozone Protection
C.20 Compliance with 40 CFR 82 and 326 IAC 22-1

D.1. EMISSIONS UNIT OPERATION CONDITIONS - Gelcoat and Surface Coating Operations 29

Emission Limitations and Standards [326 IAC 2-7-5(1)]
D.1.1 Volatile Organic Compounds (VOC) [326 IAC 2-2-3][326 IAC 8-1-6]
D.1.2 Particulate Matter (PM) [326 IAC 6-3-2]
D.1.3 Emission Standards for Hazardous Air Pollutants for Boat Manufacturing [326 IAC 20-48]
D.1.4 Reinforced Plastics Composites Production [326 IAC 20-56]
D.1.5 Preventative Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements
D.1.6 Volatile Organic Compounds (VOC)
D.1.7 Particulate Matter (PM)

Compliance Monitoring Requirements [326 IAC 2-7-5(1)][326 IAC 2-7-6(1)]
D.1.8 Monitoring [40 CFR 64]

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]
D.1.9 Record Keeping Requirements
D.1.10 Reporting Requirements

D.2 EMISSIONS UNIT OPERATION CONDITIONS - Dust Booths 38

Emission Limitations and Standards [326 IAC 2-7-5(1)]
D.2.1 Particulate Matter (PM) [326 IAC 6-3-2]

D.2.2 Preventative Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements
D.2.3 Particulate Matter (PM)

Compliance Monitoring Requirements [326 IAC 2-7-5(1)][326 IAC 2-7-6(1)]
D.2.4 Visible Emission Notations [40 CFR 64]

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-19]
D.2.5 Record Keeping Requirements

D.3 EMISSION UNIT OPERATION CONDITIONS - Insignificant Activities **40**

Emission Limitations and Standards [326 IAC 2-7-5(1)]
D.3.1 Particulate Matter (PM) [326 IAC 6-3-2]

Compliance Determination Requirements
D.3.2 Particulate Matter (PM)

E.1 NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS (NESHAP) REQUIREMENTS [326 IAC 2-7-5(1)][326 IAC 20-80-1][40 CFR, Subpart MMMM] **41**

E.1.1 General Provisions Relating to National Emission Standards for Hazardous Air Pollutants under 40 CFR Part 63 [326 IAC 20-1][40 CFR, Subpart MMMM]
E.1.2 Miscellaneous Metal Parts and Products Surface Coating Requirements [326 IAC 20-80-1][40 CFR, Subpart MMMM]

E.2 NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS (NESHAP) REQUIREMENTS [326 IAC 2-7-5(1)][326 IAC 20-81-1][40 CFR, Subpart PPPP] **43**

E.2.1 General Provisions Relating to NESHAP PPPP [326 IAC 20-1][40 CFR, Subpart PPPP]
E.2.2 Coating of Plastic Parts and Products NESHAP [326 IAC 20-81-1][40 CFR, Subpart PPPP]

E.3 NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS (NESHAP) REQUIREMENTS [326 IAC 2-7-5(1)][326 IAC 20-48][40 CFR, Subpart VVVV] **46**

E.3.1 General Provisions Relating to NESHAP VVVV [326 IAC 20-1][40 CFR, Subpart VVVV]
E.3.2 Boat Manufacturing NESHAP [326 IAC 20-48][40 CFR, Subpart VVVV]

E.4 NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS (NESHAP) REQUIREMENTS [326 IAC 2-7-5(1)][326 IAC 20-25][40 CFR, Subpart WWWW] **48**

E.4.1 General Provisions Relating to NESHAP WWWW [326 IAC 20-1][40 CFR, Subpart WWWW]
E.4.2 Reinforced Plastic Composites Production NESHAP [326 IAC 20-25][40 CFR, Subpart WWWW]

Certification 51
Emergency Occurrence Report 52
Part 70 Usage Report 54
Quarterly Report 55
Quarterly Deviation and Compliance Monitoring Report 56

Attachment A - National Emission Standards for Hazardous Air Pollutants

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 custom molded fiberglass reinforced products source.

Source Address:	2004 Patterson Street, Decatur, Indiana 46733 and 2709 Patterson Street, Decatur, Indiana 46733
Mailing Address:	2709 Patterson Street, Decatur, Indiana 46733
General Source Phone Number:	(260) 728-2476
SIC Code:	3089
County Location:	Adams
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Operating Permit Program Major Source, under PSD Rules Major Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

This custom molded fiberglass reinforced products company consists of three (3) plants:

(a) Plant 43-2 is located at 2004 Patterson Street, Decatur, Indiana;

(b) Plant 43-1 is located at 2709 Patterson Street, Decatur, Indiana; and

(c) Plant 43-3 is located at 1903 Patterson Street, Decatur, Indiana.

However, these plants are located on one or more contiguous properties, have the same two digit SIC code, and are under common ownership, therefore they will be considered one (1) major source, as defined by 326 IAC 2-7-1(22).

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

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

Building 43-1

(a) One (1) spray booth, identified as PC1, constructed in 1994, using gel coat, lamination, and spray equipment and equipped with dry filters as overspray control, exhausting to Stacks B-1-1 through B-1-3, capacity: 375 square feet of resin per hour.

(b) One (1) spray booth, identified as PC2, constructed in 1982, using gel coat, lamination, and spray equipment and equipped with dry filters as overspray control, exhausting to Stacks B-1-1 through B-1-3, capacity: 375 square feet of fiberglass parts per hour.

(c) One (1) spray booth, identified as GB2, constructed in 1982, using gel coat, lamination, and spray equipment and equipped with dry filters as overspray control, exhausting to Stacks B-1-9 and B-1-11, capacity: 1,200 square feet of fiberglass parts per hour.

(d) One (1) spray booth, identified as LB1, constructed in 1982, using gel coat, lamination and spray equipment and equipped with dry filters as overspray control, exhausting to Stacks B-1-12 through B-1-14, capacity: 1,200 square feet of material per hour.

(e) One (1) spray booth, identified as SB1, constructed in 1993, using high volume, low pressure (HVLP) spray equipment and equipped with dry filters for overspray control, exhausting to Stacks C-1-1 through C-1-3, capacity: 69 square feet of fiberglass parts per hour.

(f) One (1) paint booth, identified as P1, constructed in 1995, using high volume, low pressure (HVLP) spray equipment and equipped with dry filters for overspray control, exhausting to Stack P1, capacity: 69 square feet of fiberglass parts per hour.

(g) One (1) resin transfer molding operation, constructed in 2001, identified as RTM, with a maximum capacity of 459 pounds of resin per hour, and with emissions venting inside.

Building 43-2:

(h) Three (3) spray booths, identified as GB1, GB2, and GB3, installed in 1985, using gel coat, lamination and spray equipment and equipped with dry filters as overspray control, exhausting to stacks B-1-1 through B-1-6, capacity: 1250 square feet of fiberglass parts per hour, each.

(i) Four (4) spray booths, identified as CB1, CB2, CB3 and CB4, installed in 1985, using gel coat, lamination and spray equipment and equipped with dry filters as overspray control, exhausting to stacks B-2-1 through B-2-14, capacity: 1250 square feet of fiberglass parts per hour, each.

(j) One (1) paint system, identified as PS, installed in 1994, equipped with a water wash system as overspray control and consisting of the following equipment:

(1) One (1) tack-off booth, exhausting to stack C-2, capacity: 1250 square feet of fiberglass parts per hour.

(2) One (1) paint booth 1, equipped with high volume, low pressure (HVLP) spray guns, exhausting to stacks C-3-1 and C-3-2, capacity: 1250 square feet of fiberglass parts per hour.

(3) One (1) flash-off room, exhausting to stack C-3-3, capacity: 1250 square feet of fiberglass parts per hour.

(4) One (1) paint booth 2, equipped with high volume, low pressure (HVLP) spray guns, exhausting to stacks C-3-4 and C-3-5, capacity: 1250 square feet of fiberglass parts per hour.

(5) One (1) flash-off room, exhausting to stack C-3-6, capacity: 1250 square feet of fiberglass parts per hour.

(6) One (1) cure oven, fired by natural gas, exhausting to stack C-4, capacity: 1250 square feet of fiberglass parts per hour and 4.15 million British thermal units per hour.

(7) One (1) recirculation type dust blow-off booth with no external exhaust, equipped with an internal recirculation exhaust system with an air flow rate of 25,000 dry standard cubic feet per minute.

(8) One (1) new electric paint drying/baking oven with three (3) double-element radiant heaters at 8,000 Watts per heater for a total of 24,000 Watts exhausting to stack C-3-6. This drying oven is capable of drying a maximum of 10 parts or 800 square feet per hour.

(k) One (1) paint booth, identified as PB1, installed in 1985, using high volume, low pressure (HVLP) spray guns and equipped with dry filters for overspray control, exhausting to stack B-4-1, capacity: 1250 square feet of fiberglass parts per hour.

(l) Three (3) dust booths, identified as D-1, D-2, and D-3, installed in 1994, equipped with dry filters, exhausting to stacks D-1-1, D-1-2, and D-2-1 through D-2-4, capacity: 1250 square feet of fiberglass parts per hour, each.

(m) One (1) foam spraying process, identified as F-1, approved for construction in 2009, consisting of product tanks and one spray gun, with a capacity of 1.75 parts per hour, exhausting to the general building ventilation.

(n) One (1) filament winding process, identified as FWP, approved for construction in 2009, with a capacity of 100 pounds of resin per hour, exhausting to general building ventilation.

A.4 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, as defined in 326 IAC 2-7-1(21):

(a) Machining where an aqueous cutting coolant continuously floods the machining interface.

(b) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.

(c) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone. [326 IAC 6-3-2]

(d) An emission unit or activity whose potential uncontrolled emissions are less than three (3) pounds per hour or fifteen (15) pounds per day of VOC and less than five (5) pounds per hour or twenty five (25) pounds per day of PM10:

(1) Repair areas. Under the NESHAP 40 CFR 63 Subparts PPPP and WWWW, this source is considered an existing affected source.

(e) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour:

(1) In building 43-1, six (6) air makeup units, total capacity: 17 million British thermal units per hour.

(2) In building 43-2, air makeup units, total capacity: 43.44 million British thermal units per hour.

(f) Closed loop heating and cooling systems.

(g) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

(h) Paved and unpaved roads and parking lots with public access.

(i) Blowdown or any of the following: sight glass; boiler; compressors; pumps; and cooling tower.

(j) One (1) infrared gel oven, identified as Gel Oven, installed in 1985, exhausting to stacks B-1-7 and B-1-8, capacity: 1250 square feet of fiberglass parts per hour.

(k) One (1) infrared chop oven, identified as Oven, installed in 1985, exhausting to stacks B-2-15 and B-2-16, capacity: 1250 square feet of fiberglass parts per hour.

A.5 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, T001-25023-00043, 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 Term of Conditions [326 IAC 2-1.1-9.5]

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

(a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or

(b) the emission unit to which the condition pertains permanently ceases operation.

B.4 Enforceability [326 IAC 2-7-7]

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 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.6 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.7 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.8 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 the "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.9 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. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance and Enforcement 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.10 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) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.11 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, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

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

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

Indiana Department of Environmental Management
Compliance and Enforcement 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) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.

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

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

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

B.12 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 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.13 Prior Permits Superseded [326 IAC 2-1.1-9.5][326 IAC 2-7-10.5]

(a) All terms and conditions of permits established prior to T001-25023-00043 and issued pursuant to permitting programs approved into the state implementation plan have been either:

(1) incorporated as originally stated,

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

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

(b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

B.14 Termination of Right to Operate [326 IAC 2-7-10][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.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 and Enforcement Branch, 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).

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

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(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 Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit.
[326 IAC 2-7-5(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 Administration and Support Section, 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 Administration and Support Section, 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 limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

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

and

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

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

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

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

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

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

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

(3) Any change in emissions; and

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

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

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

(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 2-2.

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 Administration and Support Section, 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. [326 IAC 2-7-11(c)(3)]

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 Advanced Source Modification Approval [326 IAC 2-7-5(16)] [326 IAC 2-7-10.5]

(a) The requirements to obtain a source modification approval under 326 IAC 2-7-10.5 or a permit modification under 326 IAC 2-7-12 are satisfied by this permit for the proposed emission units, control equipment or insignificant activities in Sections A.2 and A.3.

(b) Pursuant to 326 IAC 2-1.1-9 any permit authorizing construction may be revoked if construction of the emission unit has not commenced within eighteen (18) months from the date of issuance of the permit, or if during the construction, work is suspended for a continuous period of one (1) year or more.

B.26 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 had 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).

C.6 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC 1-7-1(3), 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4, and 326 IAC 1-7-5(a), (b), and (d) are not federally enforceable.

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
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 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 and Enforcement Branch, 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 and Enforcement 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.

C.12 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

(a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.

(b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

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

C.13 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 August 16, 2001.

(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.14 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.15 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.

(b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:

(1) initial inspection and evaluation;

(2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or

(3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

(c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:

(1) monitoring results;

(2) review of operation and maintenance procedures and records; and/or

(3) inspection of the control device, associated capture system, and the process.

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

(e) The Permittee shall maintain the following records:

(1) monitoring data;

(2) monitor performance data, if applicable; and

(3) corrective actions taken.

C.16 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 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.17 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) Pursuant to 326 IAC 2-6-3(a)(1), the Permittee shall submit by July 1 of each year 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.18 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-2][326 IAC 2-3]

(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) If there is a reasonable possibility (as defined in 40 CFR 51.165 (a)(6)(vi)(A), 40 CFR 51.165 (a)(6)(vi)(B), 40 CFR 51.166 (r)(6)(vi)(a), and/or 40 CFR 51.166 (r)(6)(vi)(b)) that a "project" (as defined in 326 IAC 2-2-1(qq) and/or 326 IAC 2-3-1(ll)) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a "major modification" (as defined in 326 IAC 2-2-1(ee) and/or 326 IAC 2-3-1(z)) may result in significant emissions increase and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1(rr) and/or 326 IAC 2-3-1(mm)), the Permittee shall comply with following:

(1) Before beginning actual construction of the "project" (as defined in 326 IAC 2-2-1(qq) and/or 326 IAC 2-3-1(ll)) at an existing emissions unit, document and maintain the following records:

(A) A description of the project.

(B) Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.

(C) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:

(i) Baseline actual emissions;

(ii) Projected actual emissions;

(iii) Amount of emissions excluded under section 326 IAC 2-2-1(rr)(2)(A)(iii) and/or 326 IAC 2-3-1 (mm)(2)(A)(iii); and

(iv) An explanation for why the amount was excluded, and any netting calculations, if applicable.

(d) If there is a reasonable possibility (as defined in 40 CFR 51.165 (a)(6)(vi)(A) and/or 40 CFR 51.166 (r)(6)(vi)(a)) that a “project” (as defined in 326 IAC 2-2-1(qq) and/or 326 IAC 2-3-1(ll)) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a “major modification” (as defined in 326 IAC 2-2-1(ee) and/or 326 IAC 2-3-1(z)) may result in significant emissions increase and the Permittee elects to utilize the “projected actual emissions” (as defined in 326 IAC 2-2-1(rr) and/or 326 IAC 2-3-1(mm)), the Permittee shall comply with following:

(1) Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emissions unit identified in (1)(B) above; and

(2) Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.

C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [326 IAC 2-2]

(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 and Enforcement Branch, 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.

(f) If the Permittee is required to comply with the recordkeeping provisions of (d) in Section C- General Record Keeping Requirements for any “project” (as defined in 326 IAC 2-2-1 (qq) and/or 326 IAC 2-3-1 (ll)) at an existing emissions unit, and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ:

(1) The annual emissions, in tons per year, from the project identified in (c)(1) in Section C- General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-2-1 (xx) and/or 326 IAC 2-3-1 (qq), for that regulated NSR pollutant, and

(2) The emissions differ from the preconstruction projection as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(ii).

(g) The report for project at an existing emissions unit shall be submitted within sixty (60) days after the end of the year and contain the following:

(1) The name, address, and telephone number of the major stationary source.

(2) The annual emissions calculated in accordance with (d)(2) and (3) in Section C - General Record Keeping Requirements.

(3) The emissions calculated under the actual-to-projected actual test stated in 326 IAC 2-2-2(d)(3) and/or 326 IAC 2-3-2(c)(3).

(4) Any other information that the Permittee deems fit to include in this report.

Reports required in this part shall be submitted to:

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

(h) The Permittee shall make the information required to be documented and maintained in accordance with (c) in Section C- General Record Keeping Requirements available for review upon a request for inspection by IDEM, OAQ. The general public may request this information from the IDEM, OAQ under 326 IAC 17.1.

Stratospheric Ozone Protection

C.20 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)]:

Building 43-1

(a) One (1) spray booth, identified as PC1, constructed in 1994, using gel coat, lamination, and spray equipment and equipped with dry filters as overspray control, exhausting to Stacks B-1-1 through B-1-3, capacity: 375 square feet of resin per hour.

(b) One (1) spray booth, identified as PC2, constructed in 1982, using gel coat, lamination, and spray equipment and equipped with dry filters as overspray control, exhausting to Stacks B-1-1 through B-1-3, capacity: 375 square feet of fiberglass parts per hour.

(c) One (1) spray booth, identified as GB2, constructed in 1982, using gel coat, lamination, and spray equipment and equipped with dry filters as overspray control, exhausting to Stacks B-1-9 and B-1-11, capacity: 1,200 square feet of fiberglass parts per hour.

(d) One (1) spray booth, identified as LB1, constructed in 1982, using gel coat, lamination and spray equipment and equipped with dry filters as overspray control, exhausting to Stacks B-1-12 through B-1-14, capacity: 1,200 square feet of material per hour.

(e) One (1) spray booth, identified as SB1, constructed in 1993, using high volume, low pressure (HVLP) spray equipment and equipped with dry filters for overspray control, exhausting to Stacks C-1-1 through C-1-3, capacity: 69 square feet of fiberglass parts per hour.

(f) One (1) paint booth, identified as P1, constructed in 1995, using high volume, low pressure (HVLP) spray equipment and equipped with dry filters for overspray control, exhausting to Stack P1, capacity: 69 square feet of fiberglass parts per hour.

(g) One (1) resin transfer molding operation, constructed in 2001, identified as RTM, with a maximum capacity of 459 pounds of resin per hour, and with emissions venting inside.

Building 43-2:

(h) Three (3) spray booths, identified as GB1, GB2, and GB3, installed in 1985, using gel coat, lamination and spray equipment and equipped with dry filters as overspray control, exhausting to stacks B-1-1 through B-1-6, capacity: 1250 square feet of fiberglass parts per hour, each.

(i) Four (4) spray booths, identified as CB1, CB2, CB3 and CB4, installed in 1985, using gel coat, lamination and spray equipment and equipped with dry filters as overspray control, exhausting to stacks B-2-1 through B-2-14, capacity: 1250 square feet of fiberglass parts per hour, each.

(j) One (1) paint system, identified as PS, installed in 1994, equipped with a water wash system as overspray control and consisting of the following equipment:

(1) One (1) tack-off booth, exhausting to stack C-2, capacity: 1250 square feet of fiberglass parts per hour.

(2) One (1) paint booth 1, equipped with high volume, low pressure (HVLP) spray guns, exhausting to stacks C-3-1 and C-3-2, capacity: 1250 square feet of fiberglass parts per hour.

(3) One (1) flash-off room, exhausting to stack C-3-3, capacity: 1250 square feet of fiberglass parts per hour.

(4) One (1) paint booth 2, equipped with high volume, low pressure (HVLP) spray guns, exhausting to stacks C-3-4 and C-3-5, capacity: 1250 square feet of fiberglass parts per hour.

(5) One (1) flash-off room, exhausting to stack C-3-6, capacity: 1250 square feet of fiberglass parts per hour.

(6) One (1) cure oven, fired by natural gas, exhausting to stack C-4, capacity: 1250 square feet of fiberglass parts per hour and 4.15 million British thermal units per hour.

(7) One (1) recirculation type dust blow-off booth with no external exhaust, equipped with an internal recirculation exhaust system with an air flow rate of 25,000 dry standard cubic feet per minute.

(8) One (1) new electric paint drying/baking oven with three (3) double-element radiant heaters at 8,000 Watts per heater for a total of 24,000 Watts exhausting to stack C-3-6. This drying oven is capable of drying a maximum of 10 parts or 800 square feet per hour.

(k) One (1) paint booth, identified as PB1, installed in 1985, using high volume, low pressure (HVLP) spray guns and equipped with dry filters for overspray control, exhausting to stack B-4-1, capacity: 1250 square feet of fiberglass parts per hour.

(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 Volatile Organic Compounds (VOC) [326 IAC 2-2-3] [326 IAC 8-1-6]

(a) Pursuant to the determination of Best Available Control Technology for VOC emissions from resin and gel coat application operations at the two (2) lamination and gel coat booths at Plant 43-1 (PC1 and PC2), one (1) spray booth at Plant 43-1 (GB2), one (1) spray booth (LB1) at Plant 43-1, one (1) spray booth (SB1) at Plant 43-1, three (3) spray booths (GB1, GB2 and GB3) at Plant 43-2, and four (4) spray booths (CB1, CB2, CB3 and CB4) at Plant 43-2, the Permittee shall comply with the following conditions:

(1) Pursuant to CP 001-4127-00037, issued on October 17, 1995, the use of gel coats, resins, solvents and coatings shall be limited such that the potential to emit (PTE) VOCs from the total source, excluding combustion and RTM, shall be no more than 724 tons per twelve (12) consecutive month period. These VOC emissions shall be calculated on a daily basis with the weekly average, based on a six working day week, not to exceed the daily emission rate of 2.41 tons per day. Compliance with this limit shall be determined based upon the following criteria:

(A) Weekly usage by weight, monomer content that is VOC, method of application, and other emission reduction techniques for each gel coat and resin shall be recorded. Volatile organic compound emissions shall be calculated by multiplying the usage of each gel coat and resin by the emission factor that is appropriate for the monomer content, method of application and other emission reduction techniques for each gel coat

and resin, and summing the emissions for all gel coats and resins. Emission factors shall be obtained from the reference approved by IDEM, OAQ.

(B) The emission factors approved for use by IDEM, OAQ shall be taken from the following reference: "Unified Emission Factors for Open Molding of Composites," Composites Fabricators Association, April 1999, with the exception of the emission factors for controlled spray application. This reference is included with this permit. For HAP-emitting operations not addressed by this reference, emission factors shall be taken from U.S. EPA's AP-42 document. For the purposes of these emission calculations, HAP monomer in resins and gel coats that is not styrene or methyl methacrylate shall be considered as styrene on an equivalent weight basis.

(2) The HAP monomer content of resins and gel coats used shall be limited to the following or their equivalent on an emissions mass basis:

Type of Gel Coat or Resin	**HAP Monomer Content % by weight**
Production[1] Gel Coat	37
Tooling[2] Gel Coat	38
Production Resin	35
Tooling Resin	43

[1] Production refers to the manufacture of parts.
[2] Tooling refers to the manufacture of the molds from which parts are manufactured.

HAP monomer contents shall be calculated on a neat basis, which means excluding any filler. Compliance with these HAP monomer content limits shall be demonstrated on a monthly basis.

Gel coats or resins with HAP monomer contents lower than those specified in the table in this subsection or additional emission reduction techniques approved by IDEM, OAQ may be used to offset the use of gel coats or resins with HAP monomer contents higher than those specified in the table in this subsection. This is allowed to meet the HAP monomer content limits for resins and gel coats and shall be calculated on an equivalent emissions mass basis as shown below:

(Emissions from higher than compliant HAP monomer content resin or gel coat) - (Emissions from compliant resin or gel coat) $\leq$ (Emissions from compliant resin or gel coat) - (Emissions from lower than compliant HAP monomer content resin or gel coat and/or using other emission reduction techniques).

Where: Emissions, lb or ton = M (mass of resin or gel coat used, lb or ton) * EF (HAP monomer emission factor for resin or gel coat used, %);

EF, HAP monomer emission factor = emission factor, expressed as pounds (lbs) HAP emitted per ton of resin/gel coat processed, which is indicated by the HAP monomer content, method of application, and other emission reduction techniques for each gel coat and resin used.

(3) Non-atomized spray application technology shall be used to apply unfilled production resins. Non-atomized spray application technology includes flow coaters, flow choppers, pressure-fed rollers, or other non-spray applications of a design and specifications approved by IDEM, OAQ.

If it is not possible to apply a portion of unfilled resins with non-atomized spray application technology, equivalent emissions reductions must be obtained via use of other emission reduction techniques. Examples of other emission reduction techniques include, but are not limited to, lower HAP monomer content resins and gel coats, closed molding, vapor suppression, vacuum bagging/bonding, or installing a control device.

(4) Optimized spray techniques according to a manner approved by IDEM, OAQ shall be used for gel coats and filled resins (where fillers are required for corrosion or fire retardant purposes) at all times. Optimized spray techniques include, but are not limited to, the use of airless, air-assisted airless, high volume low pressure (HVLP), or other spray applicators demonstrated to the satisfaction of IDEM, OAQ, to be equivalent to the spray applicators listed above.

HVLP spray is the technology used to apply material to substrate by means of application equipment that operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

(5) The listed work practices shall be followed:

(A) To the extent possible, non-VOC, non-HAP solvent shall be used for cleanup.

(B) For VOC and/or HAP containing materials:

(i) Cleanup solvent containers shall be used to transport solvent from drums to work.

(ii) Cleanup stations shall be closed containers having soft gasketed spring-loaded closures and shall be kept completely closed when not in use.

(iii) Cleanup rags saturated with solvent shall be stored, transported, and disposed of in containers that are closed tightly.

(iv) The spray guns used shall be the type that can be cleaned without the need for spraying the solvent into the air.

(v) All solvent sprayed during cleanup or resin changes shall be directed into containers. Such containers shall be closed as soon as solvent spraying is complete and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

(C) All material storage containers shall be kept covered when not in use.

(b) Pursuant to CP 001-3261-00010, issued on March 11, 1994, BACT for the paint system at Plant 43-2, identified as PS, shall be the use of high volume, low pressure (HVLP) spray guns, and use of coatings with a solid content not less than 49.6% by volume and no more than 3.59 pounds VOC per gallon of coating, less water.

(c) Pursuant to CP 001-4127-00037, issued on October 17, 1995, the spray booth (P1) of Building 43-1, originally planned for construction at Building 43-3, shall utilize high-volume, low-pressure (HVLP) spray application with relatively high solids, low VOC coatings. HVLP application shall be considered achieved provided that the pressure of the applicators does not exceed 10 psi. Further, these coating operations shall be limited such that the solids content of the coating as applied shall not be less than 49.6% by volume, and the coating as applied shall not contain more than 5.5 lb VOC per gallon coating less water.

(d) The one (1) paint booth (PB1) at Plant 43-1 shall utilize high-volume, low-pressure (HVLP) spray application with relatively high solids, low VOC coatings. HVLP application shall be considered achieved provided that the pressure of the applicators does not exceed 10 psi. Further, these coating operations shall be limited such that the solids content of the coating as applied shall not be less than 49.6% by volume, and the coating as applied shall not contain more than 5.5 lb VOC per gallon coating less water. Therefore, the requirement of annual report of control measures used in PC (01) 1805, issued on February 9, 1990, is not applicable.

D.1.2 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(d), the particulate emission rate the two (2) lamination and gel coat booths at Plant 43-1 (PC1 and PC2), one (1) spray booth at Plant 43-1 (GB2), one (1) spray booth (LB1) at Plant 43-1, two (2) spray booths (SB1 and P1) at Plant 43-1, three (3) spray booths (GB1, GB2 and GB3) at Plant 43-2, four (4) spray booths (CB1, CB2, CB3 and CB4) at Plant 43-2, one (1) paint system (PS) at Plant 43-2, consisting of two (2) prime booths, and one (1) paint booth (PB1) at Plant 43-2 shall be controlled by a dry particulate filter or waterwash, the Permittee shall operate the control device in accordance with the manufacturer's specifications.

D.1.3 Emission Standards for Hazardous Air Pollutants for Boat Manufacturing [326 IAC 20-48]

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

Gel Coat Application		
Operation	Application Method	The weighted average HAP content shall not exceed
Pigmented gel coat	Atomized (spray)	33%
Clear gel coat operations	Atomized (spray)	48%
Tooling gel coat	Atomized (spray)	40%
Pigmented gel coat	Nonatomized (nonspray)	40%
Clear gel coat	Nonatomized (nonspray)	55%
Tooling gel coat	Nonatomized (nonspray)	54%

(b) Pursuant to 326 IAC 20-48-3, the Permittee shall operate the Building 43-1 units PC1, PC2, GB2, and LB1 and the Building 43-2 units GB1, GB2, GB3, CB1, CB2, CB3, and CB4 in accordance with the following work practice standards:

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

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

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

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

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

(A) All production and tooling resins that contain HAP.

(B) All production and tooling gel coats that contain HAP.

(C) Waste resins and gel coats that contain HAP.

(D) Cleaning materials, including waste cleaning materials.

(E) Other materials that contain HAP.

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.

(c) Pursuant to 326 IAC 20-48-4 (Operator Training), the Permittee shall comply with following operator training requirements:

(1) Train all new and existing personnel, including contract personnel, who are involved in resin and gel coat spraying and applications that could result in excess emissions if performed improperly according to the following schedule:

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

(B) To ensure training goals listed in paragraph (c)(2) of this condition are maintained, all personnel shall be given refresher training annually.

(C) Personnel who have been trained by another owner or operator subject to this rule are exempt from paragraph (c)(1)(A) of this condition if written documentation that the employee's training is current is provided to the new employer.

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

(A) Appropriate application techniques.

(B) Appropriate equipment cleaning procedures.

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

(3) Maintain the following training records on site and available for inspection and review:

(A) A copy of the current training program.

(B) 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.

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

D.1.4 Reinforced Plastics Composites Production [326 IAC 20-56]

Pursuant to 326 IAC 20-56(b), the Permittee shall comply with the following requirements in 326 IAC 20-56 after April 21, 2006, when the source becomes subject to 40 CFR Part 63, Subpart WWWW.

(a) Operator Training. Each owner or operator shall train all new and existing personnel, including contract personnel, who are involved in resin and gel coating spraying and applications that could result in excess emissions if performed improperly according to the following schedule:

(1) All personnel hired shall be trained within (30) days of hiring.

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

(3) Personnel who have been trained by another owner or operator subject to this rule are exempt from subdivision (1) if written documentation that the employee's training is current is provided to the new employees.

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

(1) Appropriate application techniques.

(2) Appropriate equipment cleaning procedures.

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

(c) The owner or operator shall maintain the following training records on site and make them available for inspection and review:

(1) A copy of the current training program.

(2) A list of the following:

(A) All current personnel, by name, that are required to be trained.

(B) The date the person was trained or date of the most recent refresher training, whichever is later.

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

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

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

Compliance Determination Requirements

D.1.6 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer, and by Conditions D.1.1(a)(1) and (2). 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.1.7 Particulate Matter (PM)

Pursuant to CP 001-4127-00037, issued on October 17, 1995, the recirculation-type dust blow-off booth shall be operated at all times so that no PM escapes from the two (2) prime spray booths into the sanding room or into the ambient air. This shall be achieved by the use of replacement filters in the exhaust plenums, air recirculation and maintenance of negative pressure inside the dust blow off booth.

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

D.1.8 Monitoring [40 CFR 64]

(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 two (2) lamination and gel coat booths at Plant 43-1 (PC1 and PC2), one (1) spray booth at Plant 43-1 (GB2), one (1) spray booth (LB1) at Plant 43-1, two (2) spray booths (SB1 and P1) at Plant 43-1, three (3) spray booths (GB1, GB2 and GB3) at Plant 43-2, four (4) spray booths (CB1, CB2, CB3 and CB4) at Plant 43-2, and one (1) paint booth (PB1) at Plant 43-2, stacks (At Plant 43-1: B-1-1 through B-1-3, B-1-9, B-1-11 through B-1-14, C-1-1 through C-1-3, and P1; At Plant 43-2: B-1-1 through B-1-6, B-2-1 through B-2-14, C-3-1, C-3-2, C-3-4, C-3-5, B-4-1) while one or more of the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

(b) The Permittee shall perform daily checks of the water curtain and flow sheets for proper flow with no visible gaps. Section C - Response to Excursions or Exceedances shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, 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. When there is a noticeable change in overspray emission, or evidence when evidence of overspray emission is observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

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

D.1.9 Record Keeping Requirements

(a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (7) below. Records maintained for (1) through (7) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC usage limits and the VOC content limits established in Condition D.1.1. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

(1) The amount, VOC content of each resin, gel coat, coating and solvent.

(a) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(b) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the dates of use;

(3) The VOC monomer content for resins and gel coats calculated on an equivalent mass basis for each month in which noncompliant resins or gel coats are used.

(4) The cleanup solvent usage for each month;

(5) The total VOC usage for each month;

(6) The average daily weight of VOCs emitted based on calculated weekly emissions and of a six-day working week; and

(7) The VOCs emitted for each compliance period.

(b) To document compliance with Conditions D.1.7 and D.1.8, the Permittee shall maintain a log of weekly overspray observations, daily checks of water curtains and flow sheets, daily and monthly inspections.

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

D.1.10 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1 and D1.2 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. 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)]:

(l) Three (3) dust booths, identified as D-1, D-2, and D-3, installed in 1994, using dry filters, exhausting to stacks D-1-1, D-1-2, and D-2-1 through D-2-4, capacity: 1250 square feet of fiberglass parts per hour, each.

(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 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from each of the three (3) dust booths shall not exceed 3.65 pounds per hour when operating at a process weight rate of 1,680 pounds per hour (0.84 tons 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.2.2 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 all control devices.

Compliance Determination Requirement

D.2.3 Particulate Matter (PM)

The dry filters for PM control shall be in operation at all times when the dust booths exhausting to the filters are in operation.

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

D.2.4 Visible Emissions Notations [40 CFR 64]

(a) Visible emission notations of stack exhausts (D-1-1, D-1-2, D-2-1, D-2-2, D-2-3, and D-2-4) shall be performed. These notations shall be taken once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee, including trained personnel under contract with the source, is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

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

D.2.5 Record Keeping Requirements

(a) To document compliance with Condition D.2.4, the Permittee shall maintain daily records of the visible emission notations of the dust booths (identified as D-1, D-2, and D-3) stack exhaust. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of a visible emission notation (e.g. the process did not operate that day).

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

SECTION D.3 FACILITY OPERATION CONDITIONS

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

(c) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone. [326 IAC 6-3-2]

(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.3.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the insignificant trimming shall not exceed 0.551 pounds per hour, when operating at a process weight rate of less than 100 pounds per hour.

Compliance Determination Requirement

D.3.2 Particulate Matter (PM)

The control devices PM control shall be in operation at all times when the facilities exhausting to the control devices are in operation.

SECTION E.1 National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements [326 IAC 2-7-5(1)][326 IAC 20-80-1][40 CFR 63, Subpart MMMM]

Emissions Unit Description:

- Plant 43 -1
  - (e) One (1) spray booth, identified as SB1, constructed in 1993, using high volume, low pressure (HVLP) spray equipment and equipped with dry filters for overspray control, exhausting to Stacks C-1-1 through C-1-3, capacity: 69 square feet of fiberglass parts per hour.
  - (f) One (1) paint booth, identified as P1, constructed in 1995, using high volume, low pressure (HVLP) spray equipment and equipped with dry filters for overspray control, exhausting to Stack P1, capacity: 69 square feet of fiberglass parts per hour.
- Plant 43-2
  - (j) One (1) paint system, identified as PS, installed in 1994, equipped with a water wash system as overspray control and consisting of the following equipment:
    - (1) One (1) tack-off booth, exhausting to stack C-2, capacity: 1250 square feet of fiberglass parts per hour.
    - (2) One (1) paint booth 1, equipped with high volume, low pressure (HVLP) spray guns, exhausting to stacks C-3-1 and C-3-2, capacity: 1250 square feet of fiberglass parts per hour.
    - (3) One (1) flash-off room, exhausting to stack C-3-3, capacity: 1250 square feet of fiberglass parts per hour.
    - (4) One (1) paint booth 2, equipped with high volume, low pressure (HVLP) spray guns, exhausting to stacks C-3-4 and C-3-5, capacity: 1250 square feet of fiberglass parts per hour.
    - (5) One (1) flash-off room, exhausting to stack C-3-6, capacity: 1250 square feet of fiberglass parts per hour.
    - (6) One (1) cure oven, fired by natural gas, exhausting to stack C-4, capacity: 1250 square feet of fiberglass parts per hour and 4.15 million British thermal units per hour.
    - (7) One (1) recirculation type dust blow-off booth with no external exhaust, equipped with an internal recirculation exhaust system with an air flow rate of 25,000 dry standard cubic feet per minute.
    - (8) One (1) new electric paint drying/baking oven with three (3) double-element radiant heaters at 8,000 Watts per heater for a total of 24,000 Watts exhausting to stack C-3-6. This drying oven is capable of drying a maximum of 10 parts or 800 square feet per hour.
  - (k) One (1) paint booth, identified as PB1, installed in 1985, using high volume, low pressure (HVLP) spray guns and equipped with dry filters for overspray control, exhausting to stack B-4-1, capacity: 1250 square feet of fiberglass parts per hour.

Under the NESHAP 40 CFR 63 Subparts MMMM and PPPP, this source 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.)

E.1.1 General Provisions Relating to National Emission Standards for Hazardous Air Pollutants under 40 CFR Part 63 [326 IAC 20-1] [40 CFR Part 63, Subpart A]

(a) Pursuant to 40 CFR 63.3901, 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 for the surface coating operations, as specified in Table 2 of 40 CFR 63, Subpart MMMM in accordance with schedule in 40 CFR 63 Subpart MMMM.

(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

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

E.1.2 Miscellaneous Metal Part and Products Surface Coating Requirements [326 IAC 20-80-1][40 CFR Part 63, Subpart MMMM]

The Permittee which engages in the surface coating of miscellaneous metal parts and products shall comply with the following provisions of 40 CFR 63, Subpart MMMM (included as Attachment A Section A of this permit), with a compliance date of January 2, 2007:

(1) 40 CFR 63.3880
(2) 40 CFR 63.3881 (a)-(c)(e)(1)-(2)
(3) 40 CFR 63.3882 (a)(b)(e)
(4) 40 CFR 63.3883 (b)(d)
(5) 40 CFR 63.3890 (b)(c)
(6) 40 CFR 63.3891 (a)(b)
(7) 40 CFR 63.3892 (a)
(8) 40 CFR 63.3893 (a)
(9) 40 CFR 63.3900 (a)(1)(b)
(10) 40 CFR 63.3901 (e)(2)
(11) 40 CFR 63.3910 (a)-(c)(8)(ii)(c)(10)
(12) 40 CFR 63.3920 (a)(1)-(6)
(13) 40 CFR 63.3930 (a)-(c)(3)(d)-(g)(j)
(14) 40 CFR 63.3931
(15) 40 CFR 63.3940
(16) 40 CFR 63.3941
(17) 40 CFR 63.3942
(18) 40 CFR 63.3950
(19) 40 CFR 63.3951
(20) 40 CFR 63.3952
(21) 40 CFR 63.3980
(22) 40 CFR 63.3981
(23) Table 2
(24) Table 3
(25) Table 4

SECTION E.2 NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS (NESHAP) REQUIREMENTS [326 IAC 2-7-5(1)] [326 IAC 20-81-1] [40 CFR 63, Subpart PPPP]

Emissions Unit Description:

o Plant 43-1

(e) One (1) spray booth, identified as SB1, constructed in 1993, using high volume, low pressure (HVLP) spray equipment and equipped with dry filters for overspray control, exhausting to Stacks C-1-1 through C-1-3, capacity: 69 square feet of fiberglass parts per hour.

(f) One (1) paint booth, identified as P1, constructed in 1995, using high volume, low pressure (HVLP) spray equipment and equipped with dry filters for overspray control, exhausting to Stack P1, capacity: 69 square feet of fiberglass parts per hour.

o Plant 43-2

(j) One (1) paint system, identified as PS, installed in 1994, equipped with a water wash system as overspray control and consisting of the following equipment:

(1) One (1) tack-off booth, exhausting to stack C-2, capacity: 1250 square feet of fiberglass parts per hour.

(2) One (1) paint booth 1, equipped with high volume, low pressure (HVLP) spray guns, exhausting to stacks C-3-1 and C-3-2, capacity: 1250 square feet of fiberglass parts per hour.

(3) One (1) flash-off room, exhausting to stack C-3-3, capacity: 1250 square feet of fiberglass parts per hour.

(4) One (1) paint booth 2, equipped with high volume, low pressure (HVLP) spray guns, exhausting to stacks C-3-4 and C-3-5, capacity: 1250 square feet of fiberglass parts per hour.

(5) One (1) flash-off room, exhausting to stack C-3-6, capacity: 1250 square feet of fiberglass parts per hour.

(6) One (1) cure oven, fired by natural gas, exhausting to stack C-4, capacity: 1250 square feet of fiberglass parts per hour and 4.15 million British thermal units per hour.

(7) One (1) recirculation type dust blow-off booth with no external exhaust, equipped with an internal recirculation exhaust system with an air flow rate of 25,000 dry standard cubic feet per minute.

(8) One (1) new electric paint drying/baking oven with three (3) double-element radiant heaters at 8,000 Watts per heater for a total of 24,000 Watts exhausting to stack C-3-6. This drying oven is capable of drying a maximum of 10 parts or 800 square feet per hour.

(k) One (1) paint booth, identified as PB1, installed in 1985, using high volume, low pressure (HVLP) spray guns and equipped with dry filters for overspray control, exhausting to stack B-4-1, capacity: 1250 square feet of fiberglass parts per hour.

(m) One (1) foam spraying process, identified as F-1, approved for construction in 2009, consisting of product tanks and one spray gun, with a capacity of 1.75 parts per hour, exhausting to the general building ventilation.

Insignificant Activities

(d) An emission unit or activity whose potential uncontrolled emissions are less than three (3) pounds per hour or fifteen (15) pounds per day of VOC and less than five (5)

pounds per hour or twenty five (25) pounds per day of PM10:

(1) Repair areas. Under the NESHAP 40 CFR 63 Subparts PPPP and WWWW, this source is considered an existing affected source.

Under NESHAP 40 CFR Subpart PPPP, the surface coating operation 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.)

E.2.1 General Provisions Relating to NESHAP PPPP [326 IAC 20-1] [40 CFR Part 63, Subpart A]

(a) Pursuant to 40 CFR 63.4480, 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 40 CFR Part 63, Subpart PPPP in accordance with schedule in 40 CFR 63 Subpart PPPP.

(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

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

E.2.2 Coating of Plastic Parts and Products NESHAP [326 IAC 20-81-1][40 CFR Part 63, Subpart PPPP]

The Permittee which engages in the surface coating of plastic parts and products shall comply with the following provisions of 40 CFR 63, Subpart PPPP (included as Attachment A Section B of this permit), with a compliance date of April 19, 2007:

(1) 40 CFR 63.4480
(2) 40 CFR 63.4481(a)(1)(2)(5)(b)(c)(d)(e)
(3) 40 CFR 63.4482
(4) 40 CFR 63.4483(b)(d)
(5) 40 CFR 63.4490(b)(c)
(6) 40 CFR 63.4491(a)(b)
(7) 40 CFR 63.4492(a)
(8) 40 CFR 63.4493(a)
(9) 40 CFR 63.4500(a)(1)(b)
(10) 40 CFR 63.4501
(11) 40 CFR 63.4510
(12) 40 CFR 63.4520 (a)
(13) 40 CFR 63.4530(a)(b)(c)(1)-(3)(d)(f)(h)
(14) 40 CFR 63.4531
(15) 40 CFR 63.4540
(16) 40 CFR 63.4541

(17) 40 CFR 63.4542
(18) 40 CFR 63.4550
(19) 40 CFR 63.4551
(20) 40 CFR 63.4552
(21) 40 CFR 63.4580
(22) 40 CFR 63.4581
(23) Table 2
(24) Table 3
(25) Table 4
(26) Appendix A

SECTION E.3 NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS (NESHAP) REQUIREMENTS [326 IAC 2-7-5(1)] [326 IAC 20-48] [40 CFR 63, Subpart VVVV]

Emissions Unit Description:

- Plant 43-1
  - (a) One (1) spray booth, identified as PC1, constructed in 1994, using gel coat, lamination, and spray equipment and equipped with dry filters as overspray control, exhausting to Stacks B-1-1 through B-1-3, capacity: 375 square feet of resin per hour.
  - (b) One (1) spray booth, identified as PC2, constructed in 1982, using gel coat, lamination, and spray equipment and equipped with dry filters as overspray control, exhausting to Stacks B-1-1 through B-1-3, capacity: 375 square feet of fiberglass parts per hour.
  - (c) One (1) spray booth, identified as GB2, constructed in 1982, using gel coat, lamination, and spray equipment and equipped with dry filters as overspray control, exhausting to Stacks B-1-9 and B-1-11, capacity: 1,200 square feet of fiberglass parts per hour.
  - (d) One (1) spray booth, identified as LB1, constructed in 1982, using gel coat, lamination and spray equipment and equipped with dry filters as overspray control, exhausting to Stacks B-1-12 through B-1-14, capacity: 1,200 square feet of material per hour.
  - (g) One (1) resin transfer molding operation, constructed in 2001, identified as RTM, with a maximum capacity of 459 pounds of resin per hour, and with emissions venting inside.
- Plant 43-2
  - (h) Three (3) spray booths, identified as GB1, GB2, and GB3, installed in 1985, using gel coat, lamination and spray equipment and equipped with dry filters as overspray control, exhausting to stacks B-1-1 through B-1-6, capacity: 1250 square feet of fiberglass parts per hour, each.
  - (i) Four (4) spray booths, identified as CB1, CB2, CB3 and CB4, installed in 1985, using gel coat, lamination and spray equipment and equipped with dry filters as overspray control, exhausting to stacks B-2-1 through B-2-14, capacity: 1250 square feet of fiberglass parts per hour, each.

Under NESHAP 40 CFR Subpart VVVV, the surface coating operation 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.)

E.3.1 General Provisions Relating to NESHAP VVVV [326 IAC 20-1] [40 CFR Part 63, Subpart A]

(a) Pursuant to 40 CFR 63.5680, 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 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

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

E.3.2 Boat Manufacturing NESHAP [326 IAC 20-48][40 CFR Part 63, Subpart VVVV]

The Permittee which engages in boat manufacturing shall comply with the following provisions of 40 CFR 63, Subpart VVVV (included as Attachment A Section C of this permit), with a compliance date of August 23, 2004:

(1) 40 CFR 63.5680
(2) 40 CFR 63.5683
(3) 40 CFR 63.5689
(4) 40 CFR 63.5692(b)
(5) 40 CFR 63.5695
(6) 40 CFR 63.5698(a)(b)(d)
(7) 40 CFR 63.5701(a)(b)
(8) 40 CFR 63.5704(a)(b)
(9) 40 CFR 63.5707
(10) 40 CFR 63.5710
(11) 40 CFR 63.5713
(12) 40 CFR 63.5714
(13) 40 CFR 63.5728(a)
(14) 40 CFR 63.5731
(15) 40 CFR 63.5743
(16) 40 CFR 63.5746
(17) 40 CFR 63.5749
(18) 40 CFR 63.5752
(19) 40 CFR 63.5753
(20) 40 CFR 63.5755
(21) 40 CFR 63.5758
(22) 40 CFR 63.5761
(23) 40 CFR 63.5764 (a)(b)(c)
(24) 40 CFR 63.5767 (a)(b)(c)
(25) 40 CFR 63.5770
(26) 40 CFR 63.5773
(27) 40 CFR 63.5776
(28) 40 CFR 63.5779
(29) Table 1
(30) Table 2
(31) Table 3
(32) Table 5
(33) Table 6
(34) Table 7
(35) Table 8

SECTION E.4 NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS (NESHAP) REQUIREMENTS [326 IAC 2-7-5(1)] [326 IAC 20-25] [40 CFR 63, Subpart WWWW]

Emissions Unit Description:

- Plant 43-1
  - (a) One (1) spray booth, identified as PC1, constructed in 1994, using gel coat, lamination, and spray equipment and equipped with dry filters as overspray control, exhausting to Stacks B-1-1 through B-1-3, capacity: 375 square feet of resin per hour.

  - (b) One (1) spray booth, identified as PC2, constructed in 1982, using gel coat, lamination, and spray equipment and equipped with dry filters as overspray control, exhausting to Stacks B-1-1 through B-1-3, capacity: 375 square feet of fiberglass parts per hour.

  - (c) One (1) spray booth, identified as GB2, constructed in 1982, using gel coat, lamination, and spray equipment and equipped with dry filters as overspray control, exhausting to Stacks B-1-9 and B-1-11, capacity: 1,200 square feet of fiberglass parts per hour.

  - (d) One (1) spray booth, identified as LB1, constructed in 1982, using gel coat, lamination and spray equipment and equipped with dry filters as overspray control, exhausting to Stacks B-1-12 through B-1-14, capacity: 1,200 square feet of material per hour.

- Plant 43-2
  - (h) Three (3) spray booths, identified as GB1, GB2, and GB3, installed in 1985, using gel coat, lamination and spray equipment and equipped with dry filters as overspray control, exhausting to stacks B-1-1 through B-1-6, capacity: 1250 square feet of fiberglass parts per hour, each.

  - (i) Four (4) spray booths, identified as CB1, CB2, CB3 and CB4, installed in 1985, using gel coat, lamination and spray equipment and equipped with dry filters as overspray control, exhausting to stacks B-2-1 through B-2-14, capacity: 1250 square feet of fiberglass parts per hour, each.

  - (n) One (1) filament winding process, identified as FWP, approved for construction in 2009, with a capacity of 100 pounds of resin per hour, exhausting to general building ventilation.

Insignificant Activities

- (d) An emission unit or activity whose potential uncontrolled emissions are less than three (3) pounds per hour or fifteen (15) pounds per day of VOC and less than five (5) pounds per hour or twenty five (25) pounds per day of PM10:

  - (1) Repair areas. Under the NESHAP 40 CFR 63 Subparts PPPP and WWWW, this source is considered an existing affected source.

Under NESHAP 40 CFR Subpart WWWW, the spray booths, filament winding, and repair areas are considered affected sources.

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

E.4.1 General Provisions Relating to NESHAP WWWW [326 IAC 20-1] [40 CFR Part 63, Subpart A]

(a) Pursuant to 40 CFR 63.5780, 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 40 CFR Part 63, Subpart WWWW in accordance with schedule in 40 CFR 63 Subpart WWWW.

(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

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

E.4.2 Reinforced Plastic Composites Production NESHAP [326 IAC 20-25][40 CFR Part 63, Subpart WWWW]

The Permittee which engages in reinforced plastic composites production shall comply with the following provisions of 40 CFR 63, Subpart WWWW (included as Attachment A Section D of this permit), with a compliance date of April 21, 2006:

(1) 40 CFR 63.5780
(2) 40 CFR 63.5785
(3) 40 CFR 63.5787 (c)(d)
(4) 40 CFR 63.5790
(5) 40 CFR 63.5795 (b)
(6) 40 CFR 63.5796
(7) 40 CFR 63.5797
(8) 40 CFR 63.5798
(9) 40 CFR 63.5799 (b)(c)
(10) 40 CFR 63.5800
(11) 40 CFR 63.5805 (b)(g)
(12) 40 CFR 63.5810 (a)(b)
(13) 40 CFR 63.5835 (a)(b)(c)
(14) 40 CFR 63.5840
(15) 40 CFR 63.5860 (a)
(16) 40 CFR 63.5895 (b)(c)(d)
(17) 40 CFR 63.5900 (a)(2)-(4)(b)(c)
(18) 40 CFR 63.5905
(19) 40 CFR 63.5910 (a)-(d)(f)(g)(i)
(20) 40 CFR 63.5915 (a)(c)(d)
(21) 40 CFR 63.5920
(22) 40 CFR 63. 5925
(23) 40 CFR 63.5930
(24) 40 CFR 63.5935
(25) Table 1
(26) Table 2
(27) Table 3

(28) Table 4
(29) Table 5
(30) Table 7
(31) Table 8
(32) Table 9
(33) Table 13
(34) Table 14
(35) Table 15

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
PART 70 OPERATING PERMIT
CERTIFICATION

Source Name:	Gold Shield of Indiana, Inc.
Source Address:	2004 Patterson Street and 2709 Patterson Street, Decatur, Indiana 46733
Mailing Address:	2709 Patterson Street, Decatur, Indiana 46733
Part 70 Permit No.:	T001-25023-00043

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: Gold Shield of Indiana, Inc.
Source Address: 2004 Patterson Street and 2709 Patterson Street, Decatur, Indiana 46733
Mailing Address: 2709 Patterson Street, Decatur, Indiana 46733
Part 70 Permit No.: T001-25023-00043

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 Usage Report

(Submit Report Quarterly)

Source Name:	Gold Shield of Indiana, Inc.
Source Address:	2004 Patterson Street and 2709 Patterson Street, Decatur, Indiana 46733
Mailing Address:	2709 Patterson Street, Decatur, Indiana 46733
Part 70 Permit No.:	T001-25023-00043
Facility:	Entire source (Plants 43-1 and 43-2), excluding combustion and RTM units
Parameter:	Total VOC emissions
Limit:	Average daily emissions of 2.41 tons per day based on weekly VOC emissions and a six (6) -day week

Month: _____ Year: _____

Day	Month 1 VOC Emissions (tons)	Month 2 VOC Emissions (tons)	Month 3 VOC Emissions (tons)	Day	Month 1 VOC Emissions (tons)	Month 2 VOC Emissions (tons)	Month 3 VOC Emissions (tons)
1				17			
2				18			
3				19			
4				20			
5				21			
6				22			
7				23			
8				24			
9				25			
10				26			
11				27			
12				28			
13				29			
14				30			
15				31			
16							

☐ No deviation occurred in this month.

☐ Deviation/s occurred in this month.
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: Gold Shield of Indiana, Inc.
Source Address: 2004 Patterson Street and 2709 Patterson Street, Decatur, Indiana 46733
Mailing Address: 2709 Patterson Street, Decatur, Indiana 46733
Part 70 Permit No.: T001-25023-00043
Facility: Entire source (Plants 43-1 and 43-2), excluding combustion and RTM units
Parameter: Total VOC emissions
Limit: Less than 724 tons per twelve (12) consecutive month period

QUARTER : YEAR:

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

☐ No deviation occurred in this quarter.

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

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

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Gold Shield of Indiana, Inc.
Source Address: 2004 Patterson Street and 2709 Patterson Street, Decatur, Indiana 46733
Mailing Address: 2709 Patterson Street, Decatur, Indiana 46733
Part 70 Permit No.: T001-25023-00043

Months: _____ to _ Year: _____

Page 1 of 2

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".
☐ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.
☐ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

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

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

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

Form Completed by:_____

Title / Position: _____

Date:_____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Part 70 Minor Source Modification

Source Description and Location

Source Name:	Gold Shield of Indiana, Inc.
Source Location:	2004 and 2709 Patterson Street, Decatur, Indiana 46733
County:	Adams
SIC Code:	3089
Operation Permit No.:	T001-25023-00043
Operation Permit Issuance Date:	October 7, 2008
Minor Source Modification No.:	001-27728-00043
Significant Permit Modification No.:	001-27741-00043
Permit Reviewer:	Michael S. Brooks

Source Definition

This custom molded fiberglass reinforced products company consists of three (3) plants:

(a) Plant 43-2 is located at 2004 Patterson Street, Decatur, Indiana;

(b) Plant 43-1 is located at 2709 Patterson Street, Decatur, Indiana; and

(c) Plant 43-3 is located at 1903 Patterson Street, Decatur, Indiana.

These plants are located on one (1) or more contiguous properties, have the same two-digit SIC code, and are under common ownership; therefore, they will be considered one (1) major source, as defined by 326 IAC 2-7-1(22).

Existing Approvals

The source was issued Part 70 Operating Permit No. T001-25023-00043 on October 7, 2008. The source has since received the following approvals:

(a) Minor Permit Modification No. 001-27359-00043, issued on March 11, 2009.

County Attainment Status

The source is located in Adams County.

Pollutant	Designation
SO_2	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O_3	Unclassifiable or attainment effective June 15, 2004, 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]Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005.

(a) Ozone Standards

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

(2) On September 6, 2007, the Indiana Air Pollution Control Board finalized a temporary emergency rule to re-designate Allen, Clark, Elkhart, Floyd, LaPorte, and St. Joseph Counties as attainment for the 8-hour ozone standard.

(3) On November 9, 2007, the Indiana Air Pollution Control Board finalized a temporary emergency rule to re-designate Boone, Hamilton, Hancock, Hendricks, Johnson, Madison, Marion, Morgan, and Shelby Counties as attainment for the 8-hour ozone standard.

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

(b) Adams County has been classified as attainment for PM2.5. On May 8, 2008, U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM2.5 emissions, and the effective date of these rules is July 15, 2008. Indiana has three (3)years from the publication of these rules to revise its PSD rules, 326 IAC 2-2, to include those requirements. The May 8, 2008 rule revisions require IDEM to regulate PM10 emissions as a surrogate for PM2.5 emissions until 326 IAC 2-2 is revised.

(c) Other Criteria Pollutants
Adams 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, 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	2842.72
PM_{10}	2842.72
SO_2	-
VOC	1298.41
CO	-
NO_X	-

This existing source is a major stationary source, under PSD (326 IAC 2-2), because a regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one (1) of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1).

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

HAPs	tons/year
Ethylbenzene	42.31
Xylene	169.80
Cumene	206.86
Toluene	168.95
MIBK	17.31
MDI	1.35
Naphthalene	2.48
Formaldehyde	3.38
Styrene	643.13
Methyl Methacrylate	196.87
Total	**>10/25**

This existing source is a major source of HAPs, as defined in 40 CFR 63.2, because HAP emissions are greater than ten (10) tons per year for a single HAP and greater than twenty-five (25) tons per year for a combination of HAPs. Therefore, this source is a major source under Section 112 of the Clean Air Act (CAA).

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2006 OAQ emission data.

Pollutant	**Actual Emissions** (ton/yr)
PM	1
SO_2	-
VOC	283
CO	-
NO_X	-
HAP	not reported
Total HAPs	not reported

Description of Proposed Modification

The Office of Air Quality (OAQ) has reviewed a modification application, submitted by Gold Shield of Indiana, Inc., on April 7, 2009, relating to the construction and operation of a filament winding process. The following is a list of the proposed emission unit:

(a) One (1) filament winding process, identified as FWP, approved for construction in 2009, with a capacity of 100 pounds of resin per hour, exhausting to general building ventilation.

Enforcement Issues

There are no pending enforcement actions.

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	-
PM_{10}	-
$PM_{2.5}$	-
SO_2	-
VOC	14.25
CO	-
NO_X	-

HAP PTE Before Controls of the Modification	
HAPs	**Potential To Emit** (ton/yr)
Styrene	13.38
other	0.87
TOTAL	14.25

This source modification is subject to 326 IAC 2-7-10.5(d)(5), because the modification is subject to a National Emission Standard for Hazardous Air Pollutants (NESHAP). Additionally, the modification will be incorporated into the Part 70 Operating Permit through a minor permit modification issued pursuant to 326 IAC 2-7-12(b)(1)(B), because the modification does not involve significant changes to existing monitoring.

Permit Level Determination – PSD or Emission Offset

The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of this Part 70 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**
One (1) filament winding process (FWP)	-	-	-	14.25	-	-

	Potential to Emit (ton/yr)					
Process / Emission Unit	**PM**	**PM_{10}**	**SO_2**	**VOC**	**CO**	**NO_X**
Total for Modification	-	-	-	14.25	-	-
Major Source Threshold	25	10	40	40	100	40

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

Federal Rule Applicability Determination

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) National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production (40 CFR 63, Subpart WWWW), which is incorporated by reference as 326 IAC 20-56.

National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production (40 CFR 63, Subpart WWWW) is not being incorporated as part of this modification as the source is already subject to Subpart WWWW. There are no additional requirements needed for this modification.

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

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 WWWW.

CAM:

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

(1) has a potential to emit before controls equal to or greater than the Part 70 major source threshold for the pollutant involved;

(2) is subject to an emission limitation or standard for that pollutant; and

(3) uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.

Based on these criteria, the requirements of 40 CFR Part 64, (CAM) are not applicable to the new process as part of this modification.

State Rule Applicability Determination

326 IAC 2-2 (PSD)

PSD applicability is discussed under the Permit Level Determination – PSD section.

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

The operation of the filament winding process (FWP) has the potential to emit greater than ten (10) tons per year for a single HAP; however, pursuant to 326 IAC 2-4.1-1(b)(2), because the filament winding process (FWP) is specifically regulated by NESHAP 40 CFR 63, (Subpart WWWW), which was issued pursuant to Section 112(d) of the CAA, therefore the filament winding process (FWP) is exempt from the requirements of 326 IAC 2-4.1.

326 IAC 8-1-6 (General Reduction Requirements for VOC Emissions)
The provisions of 326 IAC 8-1-6 apply to facilities located in any county constructed after January 1, 1980, which are not otherwise regulated by any other provisions of 326 IAC 8, and have potential VOC emissions of twenty-five (25) tons per year or greater. The filament winding process (FWP) is not subject to 326 IAC 8-1-6 (General Reduction Requirements for VOC Emissions) because the potential VOC emissions are less than twenty-five (25) tons per year for this modification.

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
The filament winding process (FWP) is not subject to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) because the unit does not emit any particulate.

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.

There are no new compliance determination and monitoring requirements applicable to this modification.

Proposed Changes

The changes listed below have been made to Part 70 Operating Permit No. T001-25023-00043. Deleted language appears as ~~strikethroughs~~ and new language appears in **bold**:

Change #1 Section A.3 has been updated to include the addition of the emission unit as follows:

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

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

...

Building 43-2:

...

(n) One (1) filament winding process, identified as FWP, approved for construction in 2009, with a capacity of 100 pounds of resin per hour, exhausting to general building ventilation.

Change #2 Section E.4 has been updated to include the addition of the emission unit as follows:

SECTION E.4 NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS (NESHAP) REQUIREMENTS [326 IAC 2-7-5(1)] [326 IAC 20-25] [40 CFR 63, Subpart WWWW]

Emissions Unit Description:
...
o Plant 43-2
...

(n) One (1) filament winding process, identified as FWP, approved for construction in 2009, with a capacity of 100 pounds of resin per hour, exhausting to general building ventilation.

Insignificant Activities

(d) An emission unit or activity whose potential uncontrolled emissions are less than three (3) pounds per hour or fifteen (15) pounds per day of VOC and less than five (5) pounds per hour or twenty five (25) pounds per day of PM10:

(1) Repair areas. Under the NESHAP 40 CFR 63 Subparts PPPP and WWWW, this source is considered an existing affected source.

Under NESHAP 40 CFR Subpart WWWW, the ~~surface coating operation is~~ **spray booths, filament winding, and repair areas are** considered ~~an existing~~ affected source**s**.

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

OAQ Changes:

(1) Section E.3 has been corrected as follows:

...
E.3.1 General Provisions Relating to NESHAP VVVV [326 IAC 20-1] [40 CFR Part 63, Subpart A]

(a) Pursuant to 40 CFR 63.~~4480~~**5680**, 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 40 CFR Part 63, Subpart VVVV in accordance with schedule in 40 CFR 63 Subpart VVVV.

...

(2) Section E.4 has been corrected as follows:

...
E.4.1 General Provisions Relating to NESHAP WWWW [326 IAC 20-1] [40 CFR Part 63, Subpart A]

(a) Pursuant to 40 CFR 63.~~4480~~**5780**, 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 40 CFR Part 63, Subpart WWWW in accordance with schedule in 40 CFR 63 Subpart WWWW.

...

(3) Several of IDEM's Branches and sections have been renamed. Therefore, IDEM has updated the addresses listed in the permit. References to Permit Administration and Development Section and the Permits Branch have been changed to Permit Administration and Support Section. References to Asbestos Section, Compliance Data Section, Air Compliance Section, and Compliance Branch have been changed to Compliance and Enforcement Branch.

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

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

Conclusion and Recommendation

The construction and operation of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Minor Source Modification No. 001-27728-00043 and Minor Permit Modification No. 001-27741-00043. The staff recommends to the Commissioner that this Part 70 Minor Source and Minor Permit Modification be approved.

Appendix A: Emissions Calculations

Company Name: Gold Shield of Indiana, Inc.
Address, City IN Zip: 2400 and 2790 Patterson Street, Decatur, Indiana 46733
Source Mod: 001-27728-00043
Permit Mod: 001-27741-00043
Reviewer: Michael S. Brooks
Date: 4/20/2009

Unit Type	Maximum Capacity	Maximum Usage	VOC content of Resin	Total HAP content of Resin	Styrene Content of Resin	Emission Factor	Potential to Emit VOC	Potential to Emit VOC	Potential to Emit Total HAP	Potential to Emit Total HAP	Potential to Emit Styrene	Potential to Emit Styrene
	parts/hour	lbs of resin / part				(weight % of starting monomer emitted)	pounds / hour	tons / year	pounds / hour	tons / year	pounds / hour	tons / year
Small Mandrel	2.250	29.7	32.5%	32.5%	30.5%	10%	2.172	9.51	2.1718125	9.51253875	2.0381625	8.92715175
Large Mandrel	2.250	44.5	32.5%	32.5%	30.5%	10%	3.254	14.25	3.2540625	14.2527938	3.0538125	13.3756988
Worst Case Potential To Emit from Process							**3.25**	**14.25**	**3.25**	**14.25**	**3.05**	**13.38**

METHODOLOGY

Monomer Emission Factor from AP-42, Table 4.4-2 , Filament Winding, non-vapor suppresed resin

Pollutant Emissions (tons/yr) = Pollutant EF (lbs pollutant/ton material) * lbs material /units * units /hr * 1 ton material/2000 lbs material * 1 ton pollutant / 2000 lbs pollutant * 8760 hrs/yr

PM Emissions (tons/yr) = neglibible or no particulate emissions - the material is not sprayed