PART 70 OPERATING PERMIT
and ENHANCED NEW SOURCE REVIEW
OFFICE OF AIR MANAGEMENT

Charleston Corporation
U.S. 6 and Dogwood
Bremen, Indiana 46506

(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 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T099-6954-00037	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date:

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). 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)]

The Permittee owns and operates a stationary fiberglass motor vehicle parts and accessories manufacturing operation.

Responsible Official:	Thomas A. Stutsman
Source Address:	U.S. 6 and Dogwood, Bremen, Indiana 46506
Mailing Address:	U.S. 6 and Dogwood, Bremen, Indiana 46506
SIC Code:	3714
County Location:	Marshall
County Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD Rules; Major Source, Section 112 of the Clean Air Act

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

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

(1) seven (7) gel coat booths (ID Nos. GC1 through GC7), one of which (ID No. GC1) is also used as a paint spray booth, each utilizing an air assisted spray application system, each with dry filters for particulate matter overspray control, and each exhausting through one (1) stack, (ID Nos. S2, S3, S4, S5, S16, S17, and S18, respectively); and

(2) four (4) resin/chopper booths (ID Nos. C1 through C4), each utilizing an air assisted spray application system, each with dry filters for particulate matter overspray control, three (3) of which each exhaust through one (1) stack (ID Nos. S1, S6, and S7, respectively), and one (1) of which (ID No. C4) exhausts through two (2) stacks (ID Nos. S14 and S15).

All of the above booths produce a maximum total of 16 fiberglass parts per hour.

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

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

(1) six (6) fiberglass grinding booths (ID Nos. G1 through G6), with dry filters for particulate matter (PM) control, each exhausting through one (1) stack (ID Nos. S8 through S13, respectively), having PM emissions less than 5 pounds per hour.

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

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

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

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

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [326 IAC 2-1-10] [IC 13]

(a) Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7.

(b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-1-3.2 or 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled “Permit Shield.”

B.2 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, any applicable definitions found in IC 13-11, 326 IAC 1-2 and 326 IAC 2-7 shall prevail.

B.3 Permit Term [326 IAC 2-7-5(2)]

This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

B.4 Enforceability [326 IAC 2-7-7(a)]

(a) All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM.

(b) Unless otherwise stated, terms and conditions of this permit, including any provisions to limit the source’s potential to emit, are enforceable by the United States Environmental Protection Agency (U.S. EPA) and citizens under the Clean Air Act.

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

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

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

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

B.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(b) The Permittee shall furnish to IDEM, OAM, within a reasonable time, any information that IDEM, OAM 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.

(c) Upon request, the Permittee shall also furnish to IDEM, OAM copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAM along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit constitutes a violation of the Clean Air Act and is grounds for:

(1) Enforcement action;

(2) Permit termination, revocation and reissuance, or modification; or

(3) Denial of a permit renewal application.

(b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]

(a) Any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, 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, on the attached Certification Form, with each submittal.

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

B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

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, OAM on or before the date it is due.

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

(1) The identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was based on continuous or intermittent data;

(4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3);

(5) Any insignificant activity that has been added without a permit revision;

(6) Such other facts, as specified in Sections D of this permit, as IDEM, OAM 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.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) PMP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM.

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

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.

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

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

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

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

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM 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 Management, Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

(5) For each emergency lasting one (1) hour or more, the Permittee submitted notice, either in writing or facsimile, of the emergency to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

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

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

(A) A description of the emergency;

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

(C) Corrective actions taken.

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

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

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

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

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

(g) Operations may continue during an emergency only if the following conditions are met:

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

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

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

B.14 Permit Shield [326 IAC 2-7-15]

(a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.

(b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:

(1) The applicable requirements are included and specifically identified in this permit; or

(2) The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.

(c) 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, including any term or condition from a previously issued construction or operation permit, IDEM, OAM 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.

(d) 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.

(e) 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.

(f) 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).

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

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

B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

B.16 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 Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation.

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or

(2) An emergency as defined in 326 IAC 2-7-1(12); or

(3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.

(4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

(c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

(d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

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

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM 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, OAM 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, OAM at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.18 Permit Renewal [326 IAC 2-7-4]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM 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).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

(b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]

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

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

(B) 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, OAM on or before the date it is due. [326 IAC 2-5-3]

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

(c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAM 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, OAM, any additional information identified as being needed to process the application.

(d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAM fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

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

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule.

(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.20 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)(D)(i) 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.21 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(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) and the following additional conditions:

(a) For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.

(b) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).

B.22 Operational Flexibility [326 IAC 2-7-20]

(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 approval required by 326 IAC 2-1 has been obtained;

(3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

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

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

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

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

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

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

(d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAM, 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.23 Construction Permit Requirement [326 IAC 2]

Except as allowed by Indiana P.L. 130-1996 Section 12, as amended by P.L. 244-1997, modification, construction, or reconstruction shall be approved as required by and in accordance with 326 IAC 2.

B.24 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM, 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) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements. [326 IAC 2-7-6(6)]

(1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM, or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAM, nor an authorized representative, may disclose the information unless and until IDEM, OAM, makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]

(2) The Permittee, and IDEM, OAM acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

B.25 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-7-11]

Pursuant to 326 IAC 2-1-6 and 326 IAC 2-7-11:

(a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch, within thirty (30) days of the change. Notification shall include a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the Permittee and the new owner.

(b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11. 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).

(c) IDEM, OAM shall reserve the right to issue a new permit.

B.26 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

(a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAM the applicable fee is due April 1 of each year.

(b) Failure to pay may result in administrative enforcement action, or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

B.27 Enhanced New Source Review [326 IAC 2]

The requirements of the construction permit rules in 326 IAC 2 are satisfied by this permit for any previously unpermitted facilities and facilities to be constructed within eighteen (18) months after the date of issuance of this permit, as listed in Sections A.2 and A.3.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]

(a) The total source potential to emit VOC is limited to less than 250 tons per year. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.

(b) Any change or modification which may increase potential to emit to 250 tons per year from this source, shall cause this source to be considered a major source under PSD, 326 IAC 2-2 and 40 CFR 52.21, and shall require approval from IDEM, OAM prior to making the change.

C.2 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), 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%) opacity 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.4 Open Burning [326 IAC 4-1] [IC 13-17-9]

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

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

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

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

All air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

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 emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory 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) 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 that the inspector be accredited is federally enforceable.

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

C.9 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 methods approved by IDEM, OAM.

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

(b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

C.10 Compliance Schedule [326 IAC 2-7-6(3)]

The Permittee:

(a) Has certified that all facilities at this source are in compliance with all applicable requirements; and

(b) Has submitted a statement that the Permittee will continue to comply with such requirements; and

(c) Will comply with such applicable requirements that become effective during the term of this permit.

C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee may extend compliance schedule an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

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

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

C.12 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the applicable requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

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

C.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 shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ninety (90) days after the date of issuance of this permit.

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

(c) If the ERP is disapproved by IDEM, OAM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

(d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

(e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

(f) Upon direct notification by IDEM, OAM, 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 68.215]

If a regulated substance, subject to 40 CFR 68, is present in a process in more than the threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

(a) Submit:

(1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or

(2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and

(3) A verification to IDEM, OAM that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.

(b) Provide annual certification to IDEM, OAM that the Risk Management Plan is being properly implemented.

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.15 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5][326 IAC 2-7-6] [326 IAC 1-6]

(a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:

(1) This condition;

(2) The Compliance Determination Requirements in Section D of this permit;

(3) The Compliance Monitoring Requirements in Section D of this permit;

(4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and

(5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :

(A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and

(B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.

(b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.

(c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:

(1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;

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

(4) The process has already returned to operating within "normal" parameters and no response steps are required.

(d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

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 corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.

(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, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not 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) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

(1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);

(2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.

(b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(c) The annual 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, OAM on or before the date it is due.

C.18 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]

(a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.

(b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.

(c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.

(d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.

(e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.

(f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.19 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

(a) Records of all required monitoring data and support information 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 kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM representative. 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 written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Records of required monitoring information shall include, where applicable:

(1) The date, place, and time of sampling or measurements;

(2) The dates analyses were performed;

(3) The company or entity performing the analyses;

(4) The analytic techniques or methods used;

(5) The results of such analyses; and

(6) The operating conditions existing at the time of sampling or measurement.

(c) Support information shall include, where applicable:

(1) Copies of all reports required by this permit;

(2) All original strip chart recordings for continuous monitoring instrumentation;

(3) All calibration and maintenance records;

(4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.

(d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.20 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

(a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported.

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM on or before the date it is due.

(d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period.

(e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports.

(f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.

(g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Stratospheric Ozone Protection

C.21 Compliance with 40 CFR 82 and 326 IAC 22-1

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

(a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

(b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

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

(a) seven (7) gel coat booths (ID Nos. GC1 through GC7), one of which (ID No. GC1) is also used as a paint spray booth, each utilizing an air assisted spray application system, each with dry filters for particulate matter overspray control, and each exhausting through one (1) stack, (ID Nos. S2, S3, S4, S5, S16, S17, and S18, respectively); and

(b) four (4) resin/chopper booths (ID Nos. C1 through C4), each utilizing an air assisted spray application system, each with dry filters for particulate matter overspray control, three (3) of which each exhaust through one (1) stack (ID Nos. S1, S6, and S7, respectively), and one (1) of which (ID No. C4) exhausts through two (2) stacks (ID Nos. S14 and S15).

All of the above booths produce a maximum total of 16 fiberglass parts per hour.

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

D.1.1 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

The total usage of volatile organic compounds (VOC) from the seven (7) gel coat booths (ID Nos. GC1 through GC7) and the four (4) resin/chopper booths (ID Nos. C1 through C4) shall be limited to no more than 244.48 tons of VOC per twelve (12) consecutive month period. The emission factor representing the percent by weight of gel coat usage that is emitted and the emission factor representing the percent by weight of resin usage that is emitted, shall each be based on the styrene monomer content of the gel coat and resin, respectively, and shall be calculated using the reference approved by IDEM, OAM: "CFA Emission Models for the Reinforced Plastics Industries," Composites Fabricators Association, February 28, 1998.

This usage limit is required to limit the source wide potential to emit of VOC to less than 250 tons per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

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

Pursuant to CP-099-2879-00037, issued on March 9, 1995, the Best Available Control Technology (BACT) for three (3) of the gel coat booths (ID Nos. GC5 through GC7) and one (1) of the resin/chopper booths (ID No. C4) that were constructed in 1992 shall be no VOC control with the following work practices:

(a) use of spray guns with a transfer efficiency of 77%; and
(b) use of resin with a styrene content less than or equal to 38% by weight.

D.1.3 Particulate Matter (PM) [326 IAC 6-3-2(c)]

(a) The PM overspray from the seven (7) gel coat booths (ID Nos. GC1 through GC7) and the four (4) resin/chopper booths (ID Nos. C1 through C4) shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

(b) Overspray from the seven (7) gel coat booths (ID Nos. GC1 through GC7) and the four (4) resin/chopper booths (ID Nos. C1 through C4) shall not be abnormally visibly detectable at the exhaust.

(c) Overspray from the seven (7) gel coat booths (ID Nos. GC1 through GC7) and the four (4) resin/chopper booths (ID Nos. C1 through C4) shall not be abnormally accumulated at the rooftops or on the ground.

D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

D.1.5 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC limit specified in Condition D.1.1 and the PM limit specified in Condition D.1.3 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.6 Volatile Organic Compounds (VOC)

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

(b) Compliance with the styrene content limit contained in Condition D.1.2 shall be determined using monthly volume weighted averaging of the resins used in the three (3) gel coat booths (ID Nos. GC5 through GC7) and one (1) of the resin/chopper booths (ID No. C4). This monthly volume weighted average shall be determined by the following equation:

$$A = 3\ (C \times U) / 3\ U$$

Where: A is the volume weighted average weight percent styrene
C is the weight percent styrene in each resin used
U is the usage rate of each resin in gallons per month

D.1.7 VOC Emissions

Compliance with Condition D.1.1 shall be demonstrated at the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

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

D.1.8 Particulate Matter (PM)

The dry filters for PM control shall be in operation at all times when the seven (7) gel coat booths (ID Nos. GC1 through GC7) and the four (4) resin/chopper booths (ID Nos. C1 through C4) are in operation.

D.1.9 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the seven (7) gel coat booth stacks (S2, S3, S4, S5, S16, S17, and S18) and the four (4) resin/chopper booth stacks (S1, S6, S7, S14, and S15) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

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

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

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

D.1.10 Record Keeping Requirements

(a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC emission limits established in Conditions D.1.1 and D.1.2.

(1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those used as cleanup solvents and other solvents;

(2) A log of the dates of use;

(3) The cleanup solvent usage for each month;

(4) The total VOC usage for each month;

(5) The weight of VOCs emitted for each compliance period; and

(6) The volume weighted styrene content of the resins used for each month.

(b) To document compliance with Conditions D.1.8 and D.1.9, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

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

D.1.11 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.2 FACILITY OPERATION CONDITIONS

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

(a) six (6) fiberglass grinding booths (ID Nos. G1 through G6), with dry filters for particulate matter (PM) control, each exhausting through one (1) stack (ID Nos. S8 through S13, respectively), having PM emissions less than 5 pounds per hour.

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

D.2.1 Particulate Matter (PM) [326 IAC 6-3]

(a) Pursuant to 326 IAC 6-3 (Process Operations), the total allowable PM emission rate from the six (6) fiberglass grinding booths (ID Nos. G1 through G6) shall not exceed 3.5 pounds per hour when operating at a total process weight rate of 1,600 pounds per hour (100 pounds per part, heaviest part).

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

Interpolation and extrapolation 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

(b) Particulate matter emissions from the six (6) fiberglass grinding booths (ID Nos. G1 through G6) shall not be abnormally visibly detectable at the exhaust.

(c) Particulate matter emissions from the six (6) fiberglass grinding booths (ID Nos. G1 through G6) shall not be abnormally accumulated at the rooftops or on the ground.

Compliance Determination Requirements

D.2.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.2.3 Particulate Matter (PM)

The dry filters for PM control shall be in operation at all times when the grinding equipment is in operation and exhausting to the outside atmosphere.

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

D.2.4 Visible Emissions Notations

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. Daily visible emission notations of the grinding operation stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

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

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

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

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

Record Keeping and Reporting Requirement [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 records of daily visible emission notations of the grinding operation stack exhaust.

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

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

PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Charleston Corporation
Source Address: U.S. 6 and Dogwood, Bremen, Indiana 46506
Mailing Address: U.S. 6 and Dogwood, Bremen, Indiana 46506
Part 70 Permit No.: T099-6954-00037

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:

9 Annual Compliance Certification Letter

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Other (specify) _____

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

Signature:

Printed Name:

Title/Position:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT

COMPLIANCE DATA SECTION
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

PART 70 OPERATING PERMIT
EMERGENCY/DEVIATION OCCURRENCE REPORT

Source Name: Charleston Corporation
Source Address: U.S. 6 and Dogwood, Bremen, Indiana 46506
Mailing Address: U.S. 6 and Dogwood, Bremen, Indiana 46506
Part 70 Permit No.: T099-6954-00037

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

Check either No. 1 or No.2
9 1. This is an emergency as defined in 326 IAC 2-7-1(12) C The Permittee must notify the Office of Air Management (OAM), within four (**4**) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and C The Permittee must submit notice in writing or by facsimile within two (**2**) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
9 2. This is a deviation, reportable per 326 IAC 2-7-5(3)(c) C The Permittee must submit notice in writing within ten (**10**) calendar days

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/Deviation:
Describe the cause of the Emergency/Deviation:

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
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: _____

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

Part 70 Quarterly Report

Source Name: Charleston Corporation
Source Address: U.S. 6 and Dogwood, Bremen, Indiana 46506
Mailing Address: U.S. 6 and Dogwood, Bremen, Indiana 46506
Part 70 Permit No.: T099-6954-00037
Facility: seven (7) gel coat booths (ID Nos. GC1 through GC7), four (4) resin/chopper booths (ID Nos. C1 through C4), and six (6) fiberglass grinding booths
Parameter: VOC Emissions
Limit: The total usage of volatile organic compounds (VOC) from the seven (7) gel coat booths (ID Nos. GC1 through GC7), the four (4) resin/chopper booths (ID Nos. C1 through C4), and the six (6) fiberglass grinding booths listed in section D.2 shall be limited to no more than 244.48 tons of VOC per twelve (12) consecutive month period based on a maximum of 17.2% by weight of the gel coat (containing a maximum of 35.45% styrene monomer) usage being emitted and a maximum of 7.8% by weight of the resin (containing a maximum of 36.12% styrene monomer) usage being emitted.

YEAR: _____

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

9 No deviation occurred in this quarter.

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

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

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

PART 70 OPERATING PERMIT
QUARTERLY COMPLIANCE MONITORING REPORT

Source Name: Charleston Corporation
Source Address: U.S. 6 and Dogwood, Bremen, Indiana 46506
Mailing Address: U.S. 6 and Dogwood, Bremen, Indiana 46506
Part 70 Permit No.: T099-6954-00037

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

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted quarterly ***(or semi-annually)***. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

Compliance Monitoring Requirement (e.g. Permit Condition D.1.3)	**Number of Deviations**	**Date of each Deviation**

Form Completed By: _____
Title/Position: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Management

Technical Support Document (TSD) for a Part 70 Operating Permit and Enhanced New Source Review (ENSR)

Source Background and Description

Source Name:	**Charleston Corporation**
Source Location:	**U.S. 6 and Dogwood, Bremen, Indiana 46506**
County:	**Marshall**
SIC Code:	**3714**
Operation Permit No.:	**T099-6954-00037**
Permit Reviewer:	**Trish Earls/EVP**

The Office of Air Management (OAM) has reviewed a Part 70 permit application from Charleston Corporation, relating to the operation of a stationary fiberglass motor vehicle parts and accessories manufacturing operation.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

(1) sixteen (16) fiberglass resin and gel coat spray, chop, and grind booths (ID No. EU-1), each utilizing an air assisted spray application system, producing a maximum total of 16 fiberglass parts per hour, each with dry filters for particulate matter overspray control, and all exhausting through one (1) stack, identified as S-1.

Unpermitted Emission Units and Pollution Control Equipment

The source also consists of the following unpermitted facilities/units:

(2) one (1) fiberglass resin and gel coat spray, chop, and grind booth (also part of EU-1), utilizing an air assisted spray application system, with dry filters for particulate matter overspray control, and exhausting through one (1) stack, identified as S-1.

Emission Units and Pollution Control Equipment Under Enhanced New Source Review (ENSR)

All facilities will be reviewed under the ENSR process. Eleven (11) of the permitted spray booths, constructed in 1966, are being reviewed under the ENSR process to remove a 99 tons per year limit contained in a previous permit. This limit was taken by the source to avoid the requirements of 326 IAC 8-6-1. This limit is unnecessary because this rule should not have applied since the booths were all constructed in 1966. The remaining permitted booths are being reviewed under the ENSR process so that the Best Available Control Technology (BACT) requirements from a previous permit can be modified since acetone is no longer considered a VOC and the source no longer uses acetone. The unpermitted spray booth is CWOP/OWOP and therefore will be reviewed under the ENSR process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(20):

(1) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units (Btu) per hour (air make-up units and heaters with a total heat input of 17.74 MMBtu per hour);
(2) combustion source flame safety purging on startup;
(3) closed loop heating and cooling systems;
(4) replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment;
(5) paved and unpaved roads and parking lots with public access;
(6) asbestos abatement projects regulated by 326 IAC 14-10;
(7) equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment;
(8) on-site fire and emergency response training approved by the department;
(9) filter or coalescer media changeout;
(10) fiberglass grinding operations associated with the seventeen (17) fiberglass spray, chop, and grind booths (ID No. EU-1), with dry filters for particulate matter (PM) control, having PM emissions less than 5 pounds per hour;
(11) woodworking equipment for a portion of the mold making operations with PM emissions less than 5 pounds per hour or 25 pounds per day;
(12) final finish repair of fiberglass, with VOC emissions less than 3 pounds per hour or 15 pounds per day;
(13) mold making paint, with VOC emissions less than 3 pounds per hour or 15 pounds per day;
(14) miscellaneous fillers and sealants usage, with VOC emissions less than 3 pounds per hour or 15 pounds per day;
(15) one (1) 6,000 gallon resin storage tank, with VOC emissions less than 3 pounds per hour or 15 pounds per day; and
(16) one (1) 7000 gallon resin storage tank, with VOC emissions less than 3 pounds per hour or 15 pounds per day.

Existing Approvals

The source has been operating under the following approvals:

(1) CP 099-4110-00037, issued on January 20, 1995; and

(2) CP 099-2879-00037, issued on March 9, 1995.

Enforcement Issue

(a) IDEM is aware that the following equipment has been constructed and operated prior to receipt of the proper permit:

(1) one (1) fiberglass resin and gel coat spray, chop, and grind booth (also part of EU-1), utilizing an air assisted spray application system, with dry filters for particulate matter overspray control, and exhausting through one (1) stack, identified as S-1.

(b) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

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

An administratively complete Part 70 permit application for the purposes of this review was received on October 18, 1996. Additional information was received on October 10, 1997.

A notice of completeness letter was mailed to Charleston Corporation on October 29, 1996.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (4 pages).

Potential Emissions

Pursuant to 326 IAC 1-2-55, Potential Emissions are defined as "emissions of any one (1) pollutant which would be emitted from a facility, if that facility were operated without the use of pollution control equipment unless such control equipment is necessary for the facility to produce its normal product or is integral to the normal operation of the facility."

Pollutant	Potential Emissions (tons/year)
PM	greater than 250
PM-10	greater than 250
SO_2	less than 100
VOC	greater than 250
CO	less than 100
NO_x	less than 100

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential Emissions (tons/year)
Styrene	greater than 10
Xylene	less than 10
Toluene	less than 10
Triethylamine	less than 10

Methyl Methacrylate	greater than 10
Dimethyl Phthalate	greater than 10
Methyl Ethyl Ketone	less than 10
Glycol Ethers	less than 10
TOTAL	greater than 25

(a) The potential emissions (as defined in the Indiana Rule) of volatile organic compounds (VOC) and particulate matter with an aerodynamic diameter less than or equal to 10 microns (PM-10) are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(b) The potential emissions (as defined in Indiana Rule) of any single HAP is equal to or greater than ten (10) tons per year and the potential emissions (as defined in Indiana Rule) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(c) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the OAM 1995 emission data. Due to lack of information on actual styrene emissions, the actual styrene emissions presented below were calculated by multiplying the actual VOC emissions by the ratio of potential styrene emissions to potential VOC emissions.

Pollutant	Actual Emissions (tons/year)
PM	0.0
PM-10	0.0
SO_2	0.0
VOC	56.5
CO	0.0
HAP (Styrene)	40.0
NO_x	0.0

Limited Potential to Emit

The table below summarizes the total limited potential to emit of the significant emission units.

	Limited Potential to Emit (tons/year)						
Process/ facility	PM	PM-10	SO_2	VOC	CO	NO_X	HAPs
Surface Coating	25.6	25.6	0.0	223.5	0.0	0.0	191.6
Total Emissions*	36.3	36.3	0.1	228.0	1.6	7.7	191.6

* Includes Insignificant Activity emissions (see Appendix A, 4 pages).

Attached Table A summarizes the permit conditions and requirements.

County Attainment Status

The source is located in Marshall County.

Pollutant	Status
TSP	attainment
PM-10	attainment
SO_2	attainment
NO_2	attainment
Ozone	attainment
CO	attainment
Lead	attainment

(a) Volatile organic compounds (VOC) and oxides of nitrogen are precursors for the formation of ozone. Therefore, VOC and NO_X emissions are considered when evaluating the rule applicability relating to the ozone standards. Marshall County has been designated as attainment or unclassifiable for ozone.

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

(1) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.

(2) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

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

(b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP)(40 CFR Part 63) applicable to this source.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

This source is not subject to 326 IAC 2-2 (PSD). This rule applies to sources with potential emissions of any criteria pollutant greater than or equal to 250 tons per year. This source will limit coating and solvent usage in the seventeen (17) spray booths (ID No. EU-1) such that associated VOC emissions do not exceed 223.5 tons per year for a source wide VOC emission limit of 228 tons per year, therefore, the requirements of 326 IAC 2-2 do not apply.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of VOC and PM-10. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

(a) Visible emissions shall not exceed an average of forty percent (40%) opacity in twenty-four (24) consecutive readings as determined by 326 IAC 5-1-4,

(b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

326 IAC 6-4 (Fugitive Dust Emissions)

This source is subject to 326 IAC 6-4 for fugitive dust emissions. Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions), fugitive dust shall not be visible crossing the boundary or property line of a source. Observances of visible emissions crossing property lines may be refuted by factual data expressed in 326 IAC 6-4-2(1), (2) or (3).

State Rule Applicability - Individual Facilities

326 IAC 2-1-3.4 (New Source Toxics Control)

The seventeen (17) spray booths (ID No. EU-1) are not subject to 326 IAC 2-1-3.4. This rule applies to new or reconstructed facilities with potential emissions of any single HAP equal to or greater than ten (10) tons per year and potential emissions of a combination of HAPs greater than or equal to twenty-five (25) tons per year. The rule does not apply to facilities that have been constructed before the effective date of this rule (July 27, 1997). Since the seventeen (17) spray booths are not new or reconstructed facilities, and have been constructed and/or permitted prior to July 27, 1997, the requirements of 326 IAC 2-1-3.4 do not apply.

326 IAC 6-3-2 (Process Operations)

The total particulate matter (PM) emissions from the grinding operations in the seventeen (17) spray booths shall not exceed 3.5 pounds per hour, based on a total process weight rate of 1,600 pounds per hour. This is based on the following 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 (0.8 tons per hour)

$E = 4.10\ (0.8)^{0.67}$
E = 3.5 pounds per hour (15.5 tons per year)

Total potential uncontrolled PM emissions from the grinding operations are 0.56 pounds per hour, therefore, the grinding operations will comply with 326 IAC 6-3-2.

The particulate matter (PM) overspray from the seventeen (17) spray booths shall be limited by the following:

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

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

326 IAC 8-1-6 (New Facilities, General Reduction Requirements)

Pursuant to CP 099-2879-00037, issued on March 9, 1995, the Best Available Control Technology for the five (5) permitted fiberglass spray booths, each constructed in 1990, was no add-on VOC control with the following work practices:

(a) use of spray guns with a transfer efficiency of 77%;
(b) use of resin with a styrene content less than or equal to 38% by weight;
(c) “Super Blue” shall be used in replacement of acetone in the chop, cleaning, repairing, and rolling areas; and
(d) Process Changes - a change in process made in conjunction with the new spray equipment was to produce van tops in one color or gel coat in order to reduce acetone usage.

Since this BACT analysis was based on acetone being a VOC and acetone is no longer used at the source, the BACT determination is being revised under the ENSR process so that the work practices related to acetone usage reduction and/or elimination are removed. Also, the applicant has stated that the construction permit issued for the five (5) spray booths, each constructed in 1990, was actually based on emissions from material usages for all six (6) spray booths constructed in 1990, but that the sixth booth was erroneously not listed in the permit application. Therefore, since potential VOC emissions from the six (6) spray booths, based on the current Part 70 permit application, are less than the potential VOC emissions on which the BACT analysis was based, the BACT determination for five (5) spray booths will also apply to the sixth spray booth. Therefore, BACT for the six (6) spray booths, constructed in 1990, shall be no add-on VOC control with the following work practices:

(a) use of spray guns with a transfer efficiency of 77%; and
(b) use of resin with a styrene content less than or equal to 38% by weight.

326 IAC 8-6 (Organic Solvent Emission Limitations)

The eleven (11) spray booths, constructed in 1966, are not subject to the requirements of 326 IAC 8-6. Pursuant to 326 IAC 8-6-1, this rule applies to existing sources as of January 1, 1980, located in Lake and Marion Counties, and sources commencing operation after October 7, 1974, and prior to January 1, 1980, located anywhere in the state with potential VOC emissions greater than 100 tons per year, not limited by other rules in Article 8. The eleven (11) spray booths were constructed in 1966, and commenced operation prior to October 7, 1974, and are located in Marshall County. Therefore, the requirements of 326 IAC 8-6 do not apply. Since this rule does not apply, the 99 tons per year limit on VOC emissions from the eleven (11) spray booths to avoid the requirements of this rule is unnecessary and will be removed under the ENSR process. However, this source will limit coating and solvent usage in all seventeen (17) spray booths (ID No. EU-1) such that associated VOC emissions do not exceed 223.5 tons per year for a source wide VOC emission limit of 228 tons per year to avoid the requirements of 326 IAC 2-2.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

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

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

The seventeen (17) fiberglass spray, chop, and grind booths (ID No. EU-1) have applicable compliance monitoring conditions as specified below:

(a) Total emissions of VOC shall not exceed 223.5 tons per 12 consecutive month period, rolled on a monthly basis, based on 35% flash off for non vapor suppressed (NVS) gel coat spray layup and 13% flash off for NVS resin spray layup;

(b) Quarterly reports shall be submitted to OAM Compliance Section. These reports shall include total monthly VOC emissions for the seventeen (17) spray booths.

(c) Daily inspections shall be performed to verify the placement, integrity and particle loading of the dry filters for PM overspray control. To monitor the performance of the dry filters, daily observations shall be made of the overspray while one or more of the booths are in operation.

(d) Weekly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an overspray emission, evidence of overspray emission, or other abnormal emission is observed.

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

These monitoring requirements are necessary to ensure that the requirements of 326 IAC 2-2 (PSD) do not apply, because the dry filters controlling PM emissions from the seventeen (17) spray booths must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and to ensure compliance with 326 IAC 2-7 (Part 70).

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 187 hazardous air pollutants set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Part 70 Application Form GSD-08.

(a) This source will emit levels of air toxics greater than those that constitute major source applicability according to Section 112 of the Clean Air Act.

(b) See attached calculations for detailed air toxic calculations (page 3 of 4).

Conclusion

The operation of this stationary fiberglass motor vehicle parts and accessories manufacturing operation shall be subject to the conditions of the attached proposed **Part 70 Permit No. T099-6954-00037.**

Indiana Department of Environmental Management
Office of Air Management

Addendum to the
Technical Support Document for a Part 70 Operating Permit and Enhanced New Source Review (ENSR)

Source Name:	Charleston Corporation
Source Location:	U.S. 6 and Dogwood, Bremen, Indiana 46506
County:	Marshall
SIC Code:	3714
Operation Permit No.:	T099-6954-00037
Permit Reviewer:	Trish Earls/EVP

On December 5, 1997, the Office of Air Management (OAM) had a notice published in the Plymouth Pilot News, Plymouth, Indiana, stating that Charleston Corporation had applied for a Part 70 Operating Permit to operate a fiberglass motor vehicle parts and accessories manufacturing operation. The notice also stated that OAM proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Upon further review, the OAM has decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted). The Table Of Contents has been modified to reflect these changes.

1. Section A (Source Summary) has been revised to clarify that the description of the source in conditions A.1 through A.3 is informational only and does not constitute separately enforceable conditions. The descriptive information in other permit conditions is enforceable.

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) ~~and presented in the permit application.~~ **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.**

2. Condition A.5 (Prior Permit Conditions Superceded) has been deleted. Language has been added to B.14 (Permit Shield) to address the effect of prior permit conditions. U.S. EPA stated that it would object to any permit that contained such supersession language.

3. Condition B.1(b) (Permit No Defense) has been revised to reference the permit shield condition that is found later in Section B.

> (b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-1-3.2 or 326 IAC 2-7-15**, as set out in this permit in the Section B condition entitled "Permit Shield."**

4. Condition B.8 (c) (Duty to Supplement Information) has been revised to clarify how the Permittee may assert a claim that records are confidential information:

> (c) Upon request, the Permittee shall also furnish to IDEM, OAM copies of records required to be kept by this permit. **If the Permittee wishes to assert a claim of confidentiality over any of the furnished records,** ~~For information claimed to be confidential~~, the Permittee **must** ~~shall~~ furnish such records to IDEM, OAM along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, **to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records,** then the Permittee **must** ~~shall~~ furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

5. Section B.11 (c) (Annual Compliance Certification) has been revised to match changes to the federal Part 70 rules. The language in (c)(3) has been revised since it appears to be a clarification rather than a change in the requirement. The language in (c)(5) has been added to clarify the treatment of insignificant activities. OAM is revising the nonrule policy document Air-007 NPD to provide more guidance regarding the annual compliance certification requirements for sources with Title V permits:

> (c) The annual compliance certification report shall include the following:
>
> (1) The identification of each term or condition of this permit that is the basis of the certification;
>
> (2) The compliance status;
>
> (3) Whether compliance was **based on** continuous or intermittent **data**;
>
> (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); ~~and~~
>
> **(5) Any insignificant activity that has been added without a permit revision; and**
>
> ~~(5)~~ **(6)** Such other facts, as specified in Sections D of this permit, as IDEM, OAM, may require to determine the compliance status of the source.
>
> The ~~notification which shall be submitted~~ **submittal** by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

6. Condition B.12 (a) (Preventive Maintenance Plan) has been revised to more closely match the language in 326 IAC 1-6-3. A provision allowing a one time extension of the time within which the Permittee must prepare and maintain the PMP has also been added to (a).

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

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each **facility**:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing ~~emission units and associated~~ emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) PMP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM.

7. Condition B.14 (Permit Shield) condition has been revised to clarify how the permit shield affects applicable requirements from previous permits and how the permit shield affects determinations that a specific requirement is not applicable to the source.

B.14 Permit Shield [326 IAC 2-7-15]

(a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.

~~(a)~~ **(b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits.** Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided **that** ~~either of the following:~~

(1) The applicable requirements are included and specifically identified in this permit; **or**

(2) ~~IDEM, OAM, in acting on the Part 70 permit application or revision, determines in writing that other requirements specifically identified are not applicable to the source, and the Part 70 permit includes the determination or a concise summary thereof.~~ **The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.**

~~(b)~~ **(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.~~ **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, including any term or condition from a previously issued construction or operation permit, IDEM, OAM 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)~~ **(d)** ~~If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement, IDEM, OAM, 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.~~ **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.**

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

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

8. Condition B.16 (Deviations from Permit Requirements and Conditions) has been revised to add the deviation terminology that had been contained in Section C, in the General Reporting Requirements condition:

B.16 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 Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation.

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or

(2) An emergency as defined in 326 IAC 2-7-1(12); or

(3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.

(4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

~~(b)~~ **(c)** Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. **The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).**

~~(c)~~ **(d)** Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

9. Condition B.18 (a) (Permit Renewal) has been changed as follows to clarify the treatment of certain trivial activities :

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, 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).**

10. Conditions B.19 (Administrative Permit Amendment), B.20 (Minor Permit Modification) , and B.21 (Significant Permit Modification) have all been combined into one condition numbered B.19 (Permit Amendment or Modification). Conditions B.20 and B.21 have been deleted. The new Condition B.19 (Permit Amendment or Modification) will read as follows:

B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

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

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule.

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

11. Condition B.26 (now renumbered B.24) (Inspection and Entry) has been revised to remove the requirement for an IDEM identification card, which other agencies do not have.

B.26 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of ~~IDEM~~ **proper** identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM, 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) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements. [326 IAC 2-7-6(6)]

(1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM, or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAM, nor an authorized representative, may disclose the information unless and until IDEM, OAM, makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]

(2) The Permittee, and IDEM, OAM, acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

12. Condition B.27 (b)(now re-numbered B.25) (Transfer of Ownership or Operation) has been revised to clarify that this notification does not require a certification by a responsible official.

(b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11. **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).**

13. Condition B.28 (now renumbered B.26) (Annual Fee Payment) has been revised to clarify the Permittee's responsibility for the timely payment of annual fees.

B.28 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

(a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing. ~~or in a time period consistent with the fee schedule established in 326 IAC 2-7-19.~~ **If the Permittee does not receive a bill from IDEM, OAM the applicable fee is due April 1 of each year.**

(b) Failure to pay may result in administrative enforcement action, or revocation of this permit.

(c) ~~If the Permittee does not receive a bill from IDEM, OAM, thirty (30) calendar days before the due date,~~ The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee. ~~The applicable fee is due April 1 of each year.~~

14. Condition C.1 is revised to change the overall source to an amount “less than” the applicable limit.

C.1 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]

(a) The total source potential to emit VOC is limited to ~~228~~ **less than 250** tons per ~~twelve (12) consecutive month period~~ **year**. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.

(b) Any change or modification which may increase potential to emit to 250 tons per ~~twelve (12) consecutive month period~~ **year from this source**, ~~from the equipment covered in this permit,~~ shall **cause this source to be considered a major source under PSD**, ~~require a PSD permit pursuant to~~ 326 IAC 2-2 **and 40 CFR 52.21**, ~~before such change may occur~~ **and shall require approval from IDEM, OAM prior to making the change**.

15. Condition C.2 (Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour) is a new condition that reads as follows to address the PM emission limitation for facilities below 100 pounds per hour.

C.2 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

16. Condition C.2 (now renumbered as C.3) (Opacity) has been revised as follows:

C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (~~Visible Emissions~~ **Opacity** Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), ~~visible emissions~~ **opacity** shall meet the following, unless otherwise stated in this permit:

(a) ~~Visible Emissions~~ **Opacity** shall not exceed an average of forty percent (40%) ~~opacity~~ **in any one (1) six (6) minute averaging period** ~~in twenty-four (24) consecutive readings~~, as determined in 326 IAC 5-1-4.

(b) ~~Visible Emissions~~ **Opacity** shall not exceed sixty percent (60%) opacity 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.

17. Condition C.6 (now renumbered C.7) (Operation of Equipment) has been revised to clarify the requirement.

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

All air pollution control equipment listed in this permit **and used to comply with an applicable requirement** shall be operated at all times that the emission unit vented to the control equipment is in operation. ~~as described in Section D of this permit.~~

18. Conditions C.7 (Asbestos Abatement Projects-Accreditation) and C.12 (Asbestos Abatement Projects) have been combined into one new condition C.8 (Asbestos Abatement Projects).

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

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 emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory 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) 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 that the inspector be accredited is federally enforceable.

19. Condition C.8 (now re-numbered C.9) (Performance Testing) is revised to correct a rule citation, add a notification requirement, and clarify that any submittal under this condition does not require a certification by a responsible official:

C.9 Performance Testing ~~[326 IAC 3-2.1]~~ **[326 IAC 3-6]**

(a) All testing shall be performed according to the provisions of 326 IAC ~~3-2.1~~ **3-6** (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAM.

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days ~~before~~ **prior to** the intended test date. **The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.**

(b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

20. Condition C.9 (now re-numbered C.10) (Compliance Schedule) has been revised to more closely match the rule language.

C.10 Compliance Schedule [326 IAC 2-7-6(3)]

The Permittee:

(a) **Has certified that all facilities at this source are in compliance with all applicable requirements; and** ~~Will continue to comply with such requirements that become effective during the term of this permit; and~~

(b) Has submitted a statement that the Permittee will continue to comply with such requirements; and

(c) **Will comply with such applicable requirements that become effective during the term of this permit.** ~~Has certified that all facilities at this source are in compliance with all applicable requirements.~~

21. Condition C.10 (now re-numbered C.11) (Compliance Monitoring) has been revised to allow a one time extension of the time to install and initiate any required monitoring.

C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee **may extend compliance schedule an additional ninety (90) days provided the Permittee** ~~shall~~ notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, **prior to the end of the initial ninety (90) day compliance schedule** ~~no more than ninety (90) days after receipt of this permit~~, with full justification of the reasons for the inability to meet this date. ~~and a schedule which it expects to meet. If a denial of the request is not received before the monitoring is fully implemented, the schedule shall be deemed approved.~~

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).

22. Condition C.11 (now re-numbered as C.12) (Monitoring Methods) has been revised to clarify the requirement.

C.12 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the **applicable** requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

23. Condition C.13 (Emergency Reduction Plans) has been revised to clarify that the plan does not require a certification by a responsible official.

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 shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ninety (90) days after the date of issuance of this permit.

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

(c) If the ERP is disapproved by IDEM, OAM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP. ~~If after this time, the Permittee does not submit an approvable ERP, then IDEM, OAM, shall supply such plan.~~

(d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

(e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

(f) Upon direct notification by IDEM, OAM, 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]

24. Condition C.14 (Risk Management Plan) has been revised to more closely match the rule language of 40 CFR 68 and clarify that any submittal under this condition requires a certification by a responsible official.

C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present **in a process** in more than the threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

(a) Submit:

(1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or

(2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and

(3) A verification to IDEM, OAM, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.

(b) Provide annual certification to IDEM, OAM, that the Risk Management Plan is being properly implemented.

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

25. Condition C.15 (Compliance Monitoring Plan-Failure to Take Response Steps) the following rule cites were changed and added to the title, as follows:

C.15 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5~~(3)~~] **[326 IAC 2-7-6] [326 IAC 1-6]**

26. Condition C.16 is revised to add the following rule cites to the title, and clarify that any submittal under this condition does not require a certification by a responsible official.

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 corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.

(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, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

27. Condition C.17 (a) has been revised to clarify the certification requirement for the emission statement.

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) The Permittee shall submit a**n** ~~certified,~~ annual emission statement **certified pursuant to the requirements of 326 IAC 2-6,** that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

28. Condition C.19 (General Record Keeping) is revised to add the following rule citation and to change the requirements for keeping records, making records available, and furnishing records, to more closely match the rule language as follows:

C.19 General Record Keeping Requirements [326 IAC 2-7-5(3)~~(B)~~]**[326 IAC 2-7-6]**

(a) Records of all required monitoring data and support information 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 kept at the source location **for a minimum of three (3) years** and available **upon the request** ~~within one (1) hour upon verbal request~~ of an IDEM, OAM representative, ~~for a minimum of three (3) years~~. ~~They~~ **The records** may be stored elsewhere for the remaining two (2) years **as long as they are available upon request** ~~providing they are made available within thirty (30) days after written request.~~ **If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.**

29. Condition C.20 (General Reporting Requirements) is revised to clarify what is included in the compliance monitoring reports and clarify that any submittal under this condition does not require a certification by a responsible official. The deviation terminology was moved to a Section B condition titled Deviations from Permit Requirements and Conditions.

C.20 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

(a) To affirm that the source has met all the **compliance monitoring** requirements stated in this permit the source shall submit a Quarterly Compliance **Monitoring** Report. Any deviation from the requirements and the date(s) of each deviation must be reported.

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

(d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period.

(e) All instances of deviations **as described in Section B- Deviations from Permit Requirements Conditions** must be clearly identified in such reports. ~~A reportable deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:~~

~~(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or~~

~~(2) An emergency as defined in 326 IAC 2-7-1(12); or~~

~~(3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.~~

~~(4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.~~

~~A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred or failure to monitor or record the required compliance monitoring is a deviation.~~

(f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.

(g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

30. The facility description box in Sections D.1 and D.2 is revised to include the rule citation:

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

31. The Certification Form is revised to clarify which forms require a certification.

32. The Emergency/Deviation Occurrence Reporting Form is revised to eliminate the certification requirement.

33. The Quarterly Compliance Report is renamed the Quarterly Compliance Monitoring Report and is revised to make it easier to understand and use.

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

PART 70 OPERATING PERMIT
CERTIFICATION

Source Name: Charleston Corporation
Source Address: U.S. 6 and Dogwood, Bremen, Indiana 46506
Mailing Address: U.S. 6 and Dogwood, Bremen, Indiana 46506
Part 70 Permit No.: T099-6954-00037

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:

9 Annual Compliance Certification Letter

~~**9** Emergency/Deviation Occurrence Reporting Form~~

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Other (specify) _____

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

Signature:

Printed Name:

Title/Position:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

PART 70 OPERATING PERMIT
EMERGENCY/DEVIATION OCCURRENCE REPORT

Source Name: Charleston Corporation
Source Address: U.S. 6 and Dogwood, Bremen, Indiana 46506
Mailing Address: U.S. 6 and Dogwood, Bremen, Indiana 46506
Part 70 Permit No.: T099-6954-00037

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

Check either No. 1 or No.2
9 1. This is an emergency as defined in 326 IAC 2-7-1(12) C The Permittee must notify the Office of Air Management (OAM), within four (**4**) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and C The Permittee must submit notice in writing or by facsimile within two (**2**) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
9 2. This is a deviation, reportable per 326 IAC 2-7-5(3)(c) C The Permittee must submit notice in writing within ten (**10**) calendar days

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/Deviation:
Describe the cause of the Emergency/Deviation:

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
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: _____

~~Attach a signed certification to complete this report.~~

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

PART 70 OPERATING PERMIT
QUARTERLY COMPLIANCE MONITORING REPORT

Source Name: Charleston Corporation
Source Address: U.S. 6 and Dogwood, Bremen, Indiana 46506
Mailing Address: U.S. 6 and Dogwood, Bremen, Indiana 46506
Part 70 Permit No.: T099-6954-00037

Months: _____ to _____ Year: _____

This report is an affirmation that the source has met all the **compliance monitoring** requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the **compliance monitoring** requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify ~~zero in the column marked "No Deviations".~~ **in the box marked "No deviations occurred this reporting period".**

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD: ~~LIST EACH COMPLIANCE REQUIREMENT EXISTING FOR THIS SOURCE:~~

Compliance Monitoring Requirement (e.g. Permit Condition D.1.3)	**Number of Deviations**	**Date of each Deviations**	**~~No~~ ~~Deviations~~**

Form Completed By: _____
Title/Position: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

34. The equipment description in section A.2 and section D.1 of the Part 70 Operating Permit, has been revised to more specifically describe the equipment present, based on a recent inspection of the source, and now reads as follows (deleted text in strikeout, new text in bold):

(1) ~~seventeen (17) fiberglass spray, chop, and grind booths (ID No. EU-1)~~ **seven (7) gel coat booths (ID Nos. GC1 through GC7), one of which (ID No. GC1) is also used as a paint spray booth,** each utilizing an air assisted spray application system, ~~producing a maximum total of 16 fiberglass parts per hour,~~ each with dry filters for particulate matter overspray control, ~~and all exhausting through one (1) stack, identified as S-1.~~ **and each exhausting through one (1) stack, (ID Nos. S2, S3, S4, S5, S16, S17, and S18, respectively); and**

(2) four (4) resin/chopper booths (ID Nos. C1 through C4), each utilizing an air assisted spray application system, each with dry filters for particulate matter overspray control, three (3) of which each exhaust through one (1) stack (ID Nos. S1, S6, and S7, respectively), and one (1) of which (ID No. C4) exhausts through two (2) stacks (ID Nos. S14 and S15).

All of the above booths produce a maximum total of 16 fiberglass parts per hour.

There are no changes in VOC permit conditions and limits due to the equipment revision.

35. The new AP-42 emission factors, based on the "CFA Emission Models for the Reinforced Plastics Industries", February, 1998, were used for the resin and gel coat emission calculations. Instead of using a flash off factor based on the type of resin or gel coat used, the new emission factors are determined based on the weight percent of styrene monomer present in the resin or gel coat. The emission factor represents the weight percent of resin or gel coat that is emitted as styrene (which is a VOC and a HAP). The new emission factors resulted in an increase in potential VOC and HAP emissions from the fiberglass layup operations. The emission calculation spreadsheets have been revised to incorporate the new emission factors. Condition D.1.1, of the Part 70 Operating permit, has been revised to incorporate the changes in the equipment description, to change the VOC usage limitation since the OAM no longer truncates monthly rolling limits by a factor of 11/12ths, and to reflect the revised emission calculation method. The condition now reads as follows (changes in bold or strikeout):

D.1.1 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

The total ~~emissions~~ **usage** of volatile organic compounds (VOC) from the ~~seventeen (17) fiberglass spray, chop, and grind booths~~ **seven (7) gel coat booths (ID Nos. GC1 through GC7), the four (4) resin/chopper booths (ID Nos. C1 through C4), and the six (6) fiberglass grinding booths listed in section D.2** shall be limited to no more than ~~223.5~~ **244.48** tons of VOC per twelve (12) consecutive month period based on **a maximum of 17.2% by weight of the gel coat (containing a maximum of 35.45% styrene monomer) usage being emitted and a maximum of 7.8% by weight of the resin (containing a maximum of 36.12% styrene monomer) usage being emitted. The emission factors were based on the reference approved by IDEM, OAM: "CFA Emission Models for the Reinforced Plastics Industries," Composites Fabricators Association, February 28, 1998.** ~~35% flash off for non-vapor suppressed (NVS) gel coat spray layup and 13% flash off for NVS resin spray layup.~~ This **usage** ~~emission~~ limit is required to limit the source wide potential to emit of VOC to ~~228~~ **less than 250** tons per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) **and 40 CFR 52.21** not applicable.

The Quarterly Report form of the Part 70 Operating Permit has also been revised such that the equipment description matches the above and to state the revised VOC usage limitation.

36. The equipment descriptions on page 1 of the TSD, under the Permitted Emission Units and Pollution Control Equipment and the Unpermitted Emission Units and Pollution Control Equipment sections, have also been revised to read as follows (changes in bold or strikeout):

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

(1) ~~sixteen (16) fiberglass resin and gel coat spray, chop, and grind booths (ID No. EU-1),~~ **seven (7) gel coat booths (ID Nos. GC1 through GC7), one of which (ID No. GC1) is also used as a paint spray booth,** each utilizing an air assisted spray application system, ~~producing a maximum total of 16 fiberglass parts per hour,~~ each with dry filters for particulate matter overspray control, ~~and all exhausting through one (1) stack, identified as S-1.~~ **and each exhausting through one (1) stack, (ID Nos. S2, S3, S4, S5, S16, S17, and S18, respectively); and**

(2) four (4) resin/chopper booths (ID Nos. C1 through C4), each utilizing an air assisted spray application system, each with dry filters for particulate matter overspray control, three (3) of which each exhaust through one (1) stack (ID Nos. S1, S6, and S7, respectively), and one (1) of which (ID No. C4) exhausts through two (2) stacks (ID Nos. S14 and S15).

All of the above booths produce a maximum total of 16 fiberglass parts per hour.

Unpermitted Emission Units and Pollution Control Equipment

The source also consists of the following unpermitted facilities/units:

~~(2)~~**(3)** ~~one (1) fiberglass resin and gel coat spray, chop, and grind booth (also part of EU-1),~~ **one (1) resin/chopper booth (ID No. C4),** utilizing an air assisted spray application system, with dry filters for particulate matter overspray control, and exhausting through ~~one (1) stack, identified as S-1.~~ **two (2) stacks (ID Nos. S14 and S15).**

37. The equipment description in section A.3 and section D.2 of the Part 70 Operating Permit has been revised to more specifically describe the equipment, based on a recent inspection of the source, and now reads as follows (changes in bold or strikeout):

(1) ~~fiberglass grinding operations associated with the seventeen (17) fiberglass spray, chop, and grind booths (ID No. EU-1),~~ **six (6) fiberglass grinding booths (ID Nos. G1 through G6),** with dry filters for particulate matter (PM) control, **each exhausting through one (1) stack (ID Nos. S8 through S13, respectively),** having PM emissions less than 5 pounds per hour.

38. Item (10) of the Insignificant Activities section of the TSD, page 2 of 9, has also been revised to read as follows (changes in bold or strikeout):

(10) ~~fiberglass grinding operations associated with the seventeen (17) fiberglass spray, chop, and grind booths (ID No. EU-1),~~ **six (6) fiberglass grinding booths (ID Nos. G1 through G6),** with dry filters for particulate matter (PM) control, **each exhausting through one (1) stack (ID Nos. S8 through S13, respectively),** having PM emissions less than 5 pounds per hour.

39. Item (a)(1) of the Enforcement Issue section of the TSD, page 2 of 9, has been revised to incorporate new model changes and now reads as follows:

(a) IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled *Unpermitted Emission Units and Pollution Control Equipment Requiring ENSR.*

40. Based on the revised equipment list per a recent inspection of the source and information provided by Charleston Corporation, and due to the revised potential emissions from the fiberglass layup operations, the portion of the State Rule Applicability - Individual Facilities section of the TSD, page 7 of 10, discussing the applicability of 326 IAC 8-1-6 has been revised as follows (deleted language in strikeout, new language in bold):

326 IAC 8-1-6 (New Facilities, General Reduction Requirements)

Pursuant to CP 099-2879-00037, issued on March 9, 1995, the Best Available Control Technology for ~~the five (5) permitted fiberglass spray booths, each constructed in 1990,~~ **three (3) of the gel coat booths (ID Nos. GC5 through GC7) and one (1) of the resin/chopper booths (ID No. C4), each constructed in 1992**, was no add-on VOC control with the following work practices:

(a) use of spray guns with a transfer efficiency of 77%;
(b) use of resin with a styrene content less than or equal to 38% by weight;
(c) "Super Blue" shall be used in replacement of acetone in the chop, cleaning, repairing, and rolling areas; and
(d) Process Changes - a change in process made in conjunction with the new spray equipment was to produce van tops in one color or gel coat in order to reduce acetone usage.

Since this BACT analysis was based on acetone being a VOC and acetone is no longer ~~used at the source~~ **considered a VOC**, the BACT determination is being revised under the ENSR process so that the work practices related to acetone usage reduction and/or elimination are removed. Also, the applicant has stated that the construction permit issued for the ~~five (5) spray booths~~ **three (3) gel coat booths (ID Nos. GC5 through GC7) and two (2) fiberglass grinding booths (ID Nos. G5 and G6)**, each constructed in ~~1990~~ **1992**, was actually based on emissions from ~~material usages for~~ all ~~six (6)~~ **five (5)** ~~spray~~ booths **and the resin/chopper booth (ID No. C4)** constructed in ~~1990~~ **1992**, but that the ~~sixth booth~~ **resin/chopper booth (ID No. C4)** was erroneously not listed in the permit application. ~~Therefore, since~~ Potential VOC emissions from the ~~six (6) spray booths~~ **three (3) gel coat booths (ID Nos. GC5 through GC7) and the resin/chopper booth (ID No. C4),** based on the current Part 70 permit application, are ~~less~~ **greater** than the potential VOC emissions on which the BACT analysis was based, **however, the source has accepted a material usage limitation on coating and solvent usage in the seven (7) gel coat booths and four (4) resin/chopper booths of 244.5 tons per year, such that source wide VOC emissions are limited to 249.0 tons per year so that the requirements of 326 IAC 2-2 (PSD) do not apply. Based on this usage limitation, the limited potential VOC emissions from the three (3) gel coat booths (ID Nos. GC5 through**

GC7) and the resin/chopper booth (ID No. C4) are less than the potential VOC emissions on which the BACT analysis was based, therefore, the BACT determination for ~~five (5) spray booths~~ **the three (3) gel coat booths (ID Nos. GC5 through GC7)** will also apply to the ~~sixth spray booth~~ **one (1) resin/chopper booth (ID No. C4)**. Therefore, BACT for the ~~six (6) spray booths~~ **three (3) gel coat booths (ID Nos. GC5 through GC7) and one (1) resin/chopper booth (ID No. C4)**, constructed in ~~1990~~ **1992**, shall be no add-on VOC control with the following work practices:

(a) use of spray guns with a transfer efficiency of 77%; and
(b) use of resin with a styrene content less than or equal to 38% by weight.

41. To incorporate the requirements for particulate matter emissions from the surface coating operations to be in compliance with 326 IAC 6-3, that were included in CP-099-2879-00037 and CP-099-4110-00037, Condition D.1.3 of the Part 70 Operating Permit has been revised to read as follows (changes in bold or strikeout):

D.1.3 Particulate Matter (PM) [326 IAC 6-3-2(c)]

(p) The PM overspray from the ~~seventeen (17) fiberglass spray, chop, and grind booths (ID No. EU-1)~~ **seven (7) gel coat booths (ID Nos. GC1 through GC7) and the four (4) resin/chopper booths (ID Nos. C1 through C4)** shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

(b) Overspray from the seven (7) gel coat booths (ID Nos. GC1 through GC7) and the four (4) resin/chopper booths (ID Nos. C1 through C4) shall not be visibly detectable at the exhaust.

(c) Overspray from the seven (7) gel coat booths (ID Nos. GC1 through GC7) and the four (4) resin/chopper booths (ID Nos. C1 through C4) shall not be accumulated at the rooftops or on the ground.

42. Condition D.1.5 (Testing Requirements) of the Part 70 Operating Permit has been revised due to new model permit changes as follows (changes in bold):

D.1.5 Testing Requirements [326 IAC 2-7-6(1)**,(6)**]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required **by IDEM**, compliance with the VOC limit specified in Condition D.1.1 and the PM limit specified in D.1.3 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. ~~This does not preclude testing requirements on this facility under 326 IAC 2-7-5 and 326 IAC 2-7-6.~~

43. Two (2) additional Compliance Determination Requirements were added to section D.1 of the Part 70 Operating Permit to determine compliance with the VOC emission limits. These new conditions read as follows:

D.1.6 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.1.1 and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM 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 VOC Emissions

Compliance with Condition D.1.1 shall be demonstrated at the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

Condition D.1.6 through D.1.9 were re-numbered as D.1.8 through D.1.11. Also note additional revisions to the new Condition D.1.6 on page 38 below.

44. With the exception of spray booths that qualify as insignificant activities and a positive establishment that controls would never be necessary to comply, the previous Part 70 permit model included daily filter checks, daily visible observations, and weekly checks for abnormal over spray accumulation at the exhaust. This can require a significant amount of resources at a plant with a large number of spray booths. The daily filter checks are one of the very few examples of a direct check on the air pollution control equipment that is included in our compliance monitoring provisions. The OAM believes that this is a very effective means of ensuring ongoing compliance. Additional monitoring of emissions is still useful to ensure that the filter is operating as designed, however, this can be done less frequently. The new Part 70 permit model requires weekly, rather than daily, visible observations and monthly, rather than weekly, rooftop over spray checks. Therefore, condition D.1.7, now re-numbered as D.1.9, Monitoring, has been revised to read as follows (changes in bold or strikeout):

D.1.9 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, ~~daily~~ **weekly** observations shall be made of the overspray **from the seven (7) gel coat booth stacks (S2, S3, S4, S5, S16, S17, and S18) and the four (4) resin/chopper booth stacks (S1, S6, S7, S14, and S15)** while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

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

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

45. To further ensure that there are no 326 IAC 6-3 violations from the grinding operation and to ensure that the dry filters are operating properly, Conditions D.2.1 and D.2.4(a), have been revised as follows (changes in bold):

D.2.1 Particulate Matter (PM) [326 IAC 6-3]

(a) Pursuant to 326 IAC 6-3 (Process Operations), the total allowable PM emission rate from the ~~fiberglass grinding operations associated with the seventeen (17) fiberglass spray, chop, and grind booths (ID No. EU-1),~~ **six (6) fiberglass grinding booths (ID Nos. G1 through G6)** shall not exceed 3.5 pounds per hour when operating at a total process weight rate of 1,600 pounds per hour (100 pounds per part, **heaviest part**).

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

(b) Particulate matter emissions from the six (6) fiberglass grinding booths (ID Nos. G1 through G6) shall not be visibly detectable at the exhaust.

(c) Particulate matter emissions from the six (6) fiberglass grinding booths (ID Nos. G1 through G6) shall not be accumulated at the rooftops or on the ground.

D.2.4 Visible Emissions Notations

(a) **Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters.** Daily visible emission notations of the grinding operation stack exhaust shall be performed during normal daylight operations **when exhausting to the atmosphere**. A trained employee shall record whether emissions are normal or abnormal.

46. Condition D.2.2 (Testing Requirements) of the Part 70 Operating Permit has been revised due to new model permit changes as follows (changes in bold):

D.2.2 Testing Requirements [326 IAC 2-7-6(1)**,(6)**]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required **by IDEM**, compliance with the PM limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. ~~This does not preclude testing requirements on this facility under 326 IAC 2-7-5 and 326 IAC 2-7-6.~~

On December 31, 1997, Charleston Corporation submitted comments on the proposed Part 70 permit. The summary of the comments and corresponding responses is as follows:

Comment #1

In Section C.19, General Record Keeping Requirements, page 24 of 35, of the Part 70 Operating Permit, we request the item (c)(4) be removed from the permit because this item is not required by 326 IAC 2-7-5(3)(B) and would be overly burdensome.

Response #1

Item (c)(4) of Condition C.19 will not be deleted because the purpose of the condition is to allow the Permittee to demonstrate that if a violation of any limitation on emissions or potential to emit occurs, it was not due to improper maintenance of equipment by the Permittee.

Comment #2

In section D.1.2, Volatile Organic Compounds, page 26 of 35, of the Part 70 Operating Permit, refers to CP-099-6954-00037 and "six (6) fiberglass spray, chop, and grind booths that were constructed in 1990". This should refer to CP-099-2879-00037" and "six (6) fiberglass spray, chop, and grind booths that were constructed in 1992".

Response #2

Condition D.1.2, now on page 29 of 39, of the Part 70 Operating Permit, has been revised to include the correct permit number and to incorporate the changes in the equipment descriptions and now reads as follows (changes in bold or strikeout):

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

Pursuant to **CP-099-**~~6954~~ **2879-00037**, issued on March 9, 1995, the Best Available Control Technology (BACT) for ~~the six (6) fiberglass spray, chop, and grind booths that were constructed in 1990~~ **three (3) of the gel coat booths (ID Nos. GC5 through GC7) and one (1) of the resin/chopper booths (ID No. C4) that were constructed in 1992** shall be no VOC control with the following work practices:

(a) use of spray guns with a transfer efficiency of 77%; and
(b) use of resin with a styrene content less than or equal to 38% by weight.

Comment #3

In section D.1.3, Particulate Matter, page 26 of 35, of the Part 70 Operating Permit, please change "The PM overspray from the seventeen fiberglass spray, chop, and grind booths" to "The PM overspray from the fiberglass spraying operations". The PM grinding emissions are addressed in section D.2.1.

Response #3

See item 41 of the OAM revisions to the Part 70 Operating Permit, on page 23 above, for the revised condition D.1.3, now on page 29 of 39.

Comment #4

In section D.1.6, Particulate Matter (PM), page 27 of 35, of the Part 70 Operating Permit, please change "The dry filters for PM control shall be in operation at all times when the seventeen (17) spray booths are in operation" to "The dry filters for PM control shall be in operation at all times when the fiberglass spraying equipment is in operation." Not all the booths are used for spraying.

Response #4

Condition D.1.6 (now re-numbered as D.1.8), now on page 30 of 39, of the Part 70 Operating Permit has been revised to read as follows (changes in bold or strikeout):

D.1.8 Particulate Matter (PM)

The dry filters for PM control shall be in operation at all times when the ~~seventeen (17) spray booths~~ **seven (7) gel coat booths (ID Nos. GC1 through GC7) and the four (4) resin/chopper booths (ID Nos. C1 through C4)** are in operation.

Comment #5

In section D.1.7(a), page 27 of 35, of the Part 70 Operating Permit, please remove "To monitor the performance of the dry filters, daily observations shall be made of the overspray while one or more of the booths are in operation." This requirement is overly burdensome and redundant to the requirement of "Daily inspections shall be performed to verify the placement, integrity, and particulate loading of the filters." Also, we should be allowed to choose how we will determine the performance of the dry filters through our Compliance Monitoring Plan and Preventive Maintenance Plan.

Please remove section D.1.7(b), page 27 of 35, of the Part 70 Operating Permit. Under normal operating conditions, since control equipment is not 100% efficient, there may be some deposition present. It would be a judgement call by an inspector to determine if the deposition is normal or abnormal.

Response #5

Complying with the requirements of 326 IAC 6-3-2 can be especially variable for spray booths. The actual substrate being coated and the solids content of the coating being used can affect the process weight rate, the gallons or pounds of solids used, transfer efficiency, or other factors that directly affect actual, allowable, or potential emissions. While permit applications contain representative information regarding these factors, relying on this information as an ongoing demonstration of compliance is difficult if the factors are not themselves enforceable. The OAM does not believe that it would be generally advisable to include these factors as permit conditions, to make them enforceable or to presume that they are so fixed they define a source's potential emissions because either could severely limit a source's operational flexibility. Properly operating the air pollution controls that are already in place is generally adequate to demonstrate compliance with 326 IAC 6-3 in lieu of a stack test and also assures compliance with applicable rules limiting fugitive dust, opacity, and (when necessary) Potential to Emit. The OAM believes that checking the placement and integrity of the filters once a day is a very effective means of ensuring proper operation and ongoing compliance. The OAM has re-evaluated the other compliance monitoring provisions related to evidence of actual emissions from the paint booths and believes that less resource intensive provisions are appropriate. The frequency of visible emissions evaluations has been changed from daily to weekly. The frequency of inspections of rooftops or other surfaces for a noticeable change in solids deposition has been changed from weekly to monthly. See item 44 of the OAM revisions to the Part 70 Operating Permit, on page 24 above, for the revised condition D.1.7 (now re-numbered as D.1.9).

Comment #6

Section D.1.8(a)(1), Record Keeping Requirements, page 27 of 35, of the Part 70 Operating Permit, states that "Solvent usage records shall differentiate between those added to coatings and those used as clean-up solvents." We do not mix solvents or add solvents to coatings. In addition, there is no reason or rule which requires the solvents be tracked separately. We request that this requirement be removed from the permit.

Section D.1.8(a)(3) requires "the volume weighted VOC content of the coatings used for each month" be recorded. This is not used for any calculations for VOC emissions and therefore should not be required. Tracking volume weighted VOC would be overly burdensome. We request that this be removed from the permit.

Section (b) requires a "log of daily overspray observations, daily and weekly inspections, and those additional inspections...". Please change this to reflect the changes in D.1.7, Monitoring.

Response #6

Solvents must be tracked separately because besides clean up solvent usage, a catalyst and release agent are used in the resin and gel coat operations at the source. However, since no solvents are actually added to the coatings before spraying, Condition D.1.8(a)(1), now re-numbered as D.1.10(a)(1) on page 31 of 39, will be revised such that the solvent usage records shall differentiate between cleanup solvents and other solvents.

Condition D.1.8(a)(3) is only necessary to show compliance with a VOC content limit. Since there are no applicable VOC content limits for the surface coating operations, this requirement will be deleted.

Part (b) of Condition D.1.8 (now re-numbered as D.1.10) has been revised to reflect the changes in monitoring frequency.

Condition D.1.8 (now re-numbered as D.1.10) is revised to read as follows (changes in bold or strikeout):

D.1.10 Record Keeping Requirements

(a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through ~~(6)~~ **(5)** below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC emission limits established in Conditions D.1.1 and D.1.2.

(1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those **used as cleanup solvents and other solvents**;

(2) A log of the dates of use;

~~(3) The volume weighted VOC content of the coatings used for each month;~~

(3) The cleanup solvent usage for each month;

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

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

(b) To document compliance with Conditions ~~D.1.6 and D.1.7~~ **D.1.8 and D.1.9**, the Permittee shall maintain a log of ~~daily~~ **weekly** overspray observations, daily and ~~weekly~~ **monthly** inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

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

Comment #7

In section D.2.1, Particulate Matter (PM), page 29 of 35, please change "a total process weight rate of 1,600 pounds per hour (100 pounds per part)" to "a total process weight rate of 1,600 pounds per hour (100 pounds per part, heaviest part)".

Response #7

Condition D.2.1, now on page 33 of 39, of the Part 70 Operating Permit has been revised to include the requested change. See item 45 under the changes made by the OAM on page 24 above.

Comment #8

In section D.2.4(a), Visible Emissions Notations, page 29 of 35 of the Part 70 Operating Permit, please change "Daily visible emission notations of the grinding operation stack exhaust shall be performed during normal daylight operations." to "Daily visible emission notations of the grinding operation stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere".

Response #8

See item 45 under the changes made by the OAM on page 25 above for the revised Condition D.2.4(a). The phrase "when exhausting to the atmosphere" was already added to the condition due to the new model permit changes.

Comment #9

The Part 70 Operating Permit Emergency/Deviation Occurrence Report, on page 32 of 35, is not consistent with section B.13, Emergency Provisions, as it does not state "each emergency lasting one hour or more." Clarification needs to be made on when to report.

Response #9

The Part 70 Operating Permit Emergency/Deviation Occurrence Report, now on page 36 and 37 of 39, is consistent with Condition B.13, Emergency Provisions, because under item No. 1, the report specifically states that when there is an emergency as defined in 326 IAC 2-7-1(12), the Permittee must notify the OAM within four (4) business hours and submit the notice in writing or by facsimile within two (2) days, and follow the other requirements of 326 IAC 2-7-16. Condition B.13 lists the requirements of 326 IAC 2-7-16. The form is therefore for emergencies lasting one (1) hour or more as stated in 326 IAC 2-7-16.

Comment #10

An Annual Compliance Certification is required to certify that the source has complied with the terms and conditions contained in the permit. The Part 70 Operating Permit Certification is required when submitting monitoring, testing reports/results or other documents. The Quarterly Compliance Report is just another report stating the same as the previous two reports, and therefore is redundant, unnecessary and overly burdensome. Please remove all references to the Quarterly Compliance Report requirement. The Annual Compliance Certification is sufficient.

Response #10

The Quarterly Compliance Monitoring Report required in the Part 70 Operating Permit is to affirm that the source is in continuous compliance with all the permit requirements. The Annual Compliance Certification is to certify that all the information contained in the documents submitted as required by the permit are true, accurate, and complete. This form is required in all Part 70 Operating Permits and will not be removed from this permit.

Comment #11

On page 1 of 9 of the TSD, under the Emission Units and Pollution Control Equipment Under Enhanced New Source Review (ENSR) section, please remove "the source no longer uses acetone." This statement is irrelevant since acetone is no longer considered a VOC. Please also make a note that the "unpermitted spray booth" was accidentally omitted from the original permit CP-099-2879. The maximum potential emissions were based off of the 6 booths, therefore, the incorporation of this booth into this permit should not constitute an enforcement action.

Response #11

The Emission Units and Pollution Control Equipment Under Enhanced New Source Review (ENSR) section of the TSD, page 1 of 9, is revised to read as follows (changes in bold or strikeout):

Emission Units and Pollution Control Equipment Under Enhanced New Source Review (ENSR)

> All facilities will be reviewed under the ENSR process. Eleven (11) of the permitted spray booths, constructed in 1966, are being reviewed under the ENSR process to remove a 99 tons per year limit contained in a previous permit. This limit was taken by the source to avoid the requirements of 326 IAC 8-6-1. This limit is unnecessary because this rule should not have applied since the booths were all constructed in 1966. The remaining permitted booths are being reviewed under the ENSR process so that the Best Available Control Technology (BACT) requirements from a previous permit can be modified since acetone is no longer considered a VOC ~~and the source no longer uses acetone~~. **The maximum potential emissions for CP-099-2879-00037 were based on emissions from the three (3) permitted gel coat booths (ID Nos. GC5 through GC7), two (2) permitted fiberglass grinding booths (ID Nos. G5 and G6) and the one (1) unpermitted resin/chopper booth (ID No. C4).** The unpermitted spray booth ~~is CWOP/OWOP~~ **was accidentally not included in CP-099-2879-00037** and therefore will be reviewed under the ENSR process.

Comment #12

Please change the HAP (Styrene) Actual Emissions (tons/year) from 40.0 to 49.4 based on the 1995 Emissions Inventory. 1996 actual emissions were 37.5 tons per year of styrene based on the 1996 Emissions Inventory.

Response #12

The Actual Emissions section of the TSD, page 4 of 9, is revised as follows (changes in bold or strikeout):

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the OAM 1995 emission data. **Actual styrene emissions were provided by the Permittee based on the source's 1995 Emissions Inventory.** ~~Due to lack of information on actual styrene emissions, the actual styrene emissions presented below were calculated by multiplying the actual VOC emissions by the ratio of potential styrene emissions to potential VOC emissions.~~

Pollutant	Actual Emissions (tons/year)
PM	0.0
PM-10	0.0
SO_2	0.0
VOC	56.5
CO	0.0
HAP (Styrene)	**49.4**
NO_x	0.0

Comment #13

In the State Rule Applicability - Entire Source section of the TSD, page 5 of 9, under 326 IAC 2-2 (Prevention of Significant Deterioration), please change "This source will limit coating and solvent usage in the seventeen (17) spray booths (ID No. EU-1) such that associated VOC emissions do not exceed 223.5 tons per year for a source wide VOC emission limit of 228 tons per year, ..." to "This source will limit coating and solvent usage in the fiberglass spraying operations such that associated VOC emissions do not exceed 223.5 tons per twelve (12) consecutive months for a source wide VOC emission limit of 228 tons per twelve (12) consecutive months,..."

Response #13

Based on the revised equipment list per a recent inspection of the source, and to change the VOC usage limitation since the OAM no longer truncates monthly rolling limits by a factor of 11/12ths, and to reflect the revised emission calculation method, the 326 IAC 2-2 (PSD) portion of the State Rule Applicability - Entire Source section of the TSD is revised as follows (changes in bold):

326 IAC 2-2 (Prevention of Significant Deterioration)

This source is not subject to 326 IAC 2-2 (PSD). This rule applies to sources with potential emissions of any criteria pollutant greater than or equal to 250 tons per year. This source will limit coating and solvent usage in the ~~seventeen (17) spray booths (ID No. EU-1)~~ **seven (7) gel coat booths (ID Nos. GC1 through GC7), the four (4) resin/chopper booths (ID Nos. C1 through C4), and the six (6) fiberglass grinding booths (ID Nos. G1 through G6)** such that associated VOC emissions do not exceed ~~223.5~~ **244.48** tons per ~~year~~ **twelve (12) consecutive month period** for a source wide VOC emission limit of ~~228~~ **249** tons per ~~year~~ **twelve (12) consecutive month period**, therefore, the requirements of 326 IAC 2-2 do not apply.

Comment #14

In the State Rule Applicability - Individual Facilities section of the TSD, page 6 of 9, under 326 IAC 2-1-3.4 (New Source Toxics Control), please change "the seventeen (17) spray booths" to "fiberglass spraying operations".

Response #14

Based on the revised equipment list per a recent inspection of the source, the 326 IAC 2-1-3.4 (New Source Toxics Control) portion of the State Rule Applicability - Individual Facilities section of the TSD is revised as follows (changes in bold):

326 IAC 2-1-3.4 (New Source Toxics Control)

The **seven (7) gel coat booths (ID Nos. GC1 through GC7), the four (4) resin/chopper booths (ID Nos. C1 through C4), and the six (6) fiberglass grinding booths (ID Nos. G1 through G6)** are not subject to 326 IAC 2-1-3.4. This rule applies to new or reconstructed facilities with potential emissions of any single HAP equal to or greater than ten (10) tons per year and potential emissions of a combination of HAPs greater than or equal to twenty-five (25) tons per year. The rule does not apply to facilities that have been constructed before the effective date of this rule (July 27, 1997). Since the **seven (7) gel coat booths (ID Nos. GC1 through GC7), the four (4) resin/chopper booths (ID Nos. C1 through C4), and the six (6) fiberglass grinding booths (ID Nos. G1 through G6)** are not new or reconstructed facilities, and have been constructed and/or permitted prior to July 27, 1997, the requirements of 326 IAC 2-1-3.4 do not apply.

Comment #15

In the State Rule Applicability - Individual Facilities section of the TSD, pages 6 and 7 of 9, under 326 IAC 6-3-2 (Process Operations), please change all references to “the seventeen (17) spray booths” to “fiberglass grinding operations”.

Response #15

Based on the revised equipment list per a recent inspection of the source, the 326 IAC 6-3-2 (Process Operations) portion of the State Rule Applicability - Individual Facilities section of the TSD is revised as follows (changes in bold):

326 IAC 6-3-2 (Process Operations)

The total particulate matter (PM) emissions from the grinding operations in the **six (6) fiberglass grinding booths (ID Nos. G1 through G6)** shall not exceed 3.5 pounds per hour, based on a total process weight rate of 1,600 pounds per hour. This is based on the following 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 (0.8 tons per hour)

$E = 4.10\ (0.8)^{0.67}$
E = 3.5 pounds per hour (15.5 tons per year)

Total potential uncontrolled PM emissions from the grinding operations are 0.56 pounds per hour, therefore, the grinding operations will comply with 326 IAC 6-3-2.

The particulate matter (PM) overspray from the **seven (7) gel coat booths (ID Nos. GC1 through GC7) and the four (4) resin/chopper booths (ID Nos. C1 through C4)** shall be limited by the following:

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

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

Comment #16

In the State Rule Applicability - Individual Facilities section of the TSD, page 7 of 9, under 326 IAC 8-1-6 (New Facilities, General Reduction Requirements), please change all references to booth construction in 1990 to 1992. Also, please remove "acetone is no longer used at the source" since acetone is no longer a VOC, and this is irrelevant.

Response #16

See item 40 under the changes made by the OAM on page 22 above for the revised paragraph discussing the applicability of 326 IAC 8-1-6 (New Facilities, General Reduction Requirements) in the State Rule Applicability - Individual Facilities section of the TSD. The above requested changes have been made.

Comment #17

In the State Rule Applicability - Individual Facilities section of the TSD, page 7 of 9, under 326 IAC 8-6 (Organic Solvent Emission Limitations), please change "However, this source will limit coating and solvent usage in all seventeen (17) spray booths (ID No. EU-1) such that associated VOC emissions do not exceed 223.5 tons per year for a source wide VOC emission limit of 228 tons per year to avoid the requirements of 326 IAC 2-2." to "However, this source will limit coating and solvent usage in the fiberglass spraying operation such that associated VOC emissions do not exceed 223.5 tons per twelve (12) consecutive months for a source wide VOC emission limit of 228 tons per twelve (12) consecutive months to avoid the requirements of 326 IAC 2-2".

Response #17

Based on the revised equipment list per a recent inspection of the source, and to change the VOC usage limitation since the OAM no longer truncates monthly rolling limits by a factor of 11/12ths, the 326 IAC 8-6 (Organic Solvent Emission Limitations) portion of the State Rule Applicability - Individual Facilities section of the TSD is revised as follows (changes in bold):

326 IAC 8-6 (Organic Solvent Emission Limitations)

The eleven (11) spray booths, constructed in 1966, are not subject to the requirements of 326 IAC 8-6. Pursuant to 326 IAC 8-6-1, this rule applies to existing sources as of January 1, 1980, located in Lake and Marion Counties, and sources commencing operation after October 7, 1974, and prior to January 1, 1980, located anywhere in the state with potential VOC emissions greater than 100 tons per year, not limited by other rules in Article 8. The eleven (11) spray booths were constructed in 1966, and commenced operation prior to October 7, 1974, and are located in Marshall County. Therefore, the requirements of 326 IAC 8-6 do not apply. Since this rule does not apply, the 99 tons per year limit on VOC emissions from the eleven (11) spray booths to avoid the requirements of this rule is unnecessary and will be removed under the ENSR process. However, this source will limit coating and solvent usage in ~~all seventeen (17) spray booths (ID No. EU-1)~~ **the seven (7) gel coat booths (ID Nos. GC1 through GC7), the four (4) resin/chopper booths (ID Nos. C1 through C4), and the six (6) fiberglass grinding booths (ID Nos. G1 through G6)** such that associated VOC emissions do not exceed ~~223.5~~ **244.5** tons per ~~year~~ **twelve (12) consecutive month period** for a source wide VOC emission limit of ~~228~~ **249** tons per ~~year~~ **twelve (12) consecutive month period** to avoid the requirements of 326 IAC 2-2.

Comment #18

In the Compliance Requirements section of the TSD, page 8 of 9, please make changes in Sections (c) and (d) to be consistent with changes in D.1.7 Monitoring. Please change "monthly VOC emissions for the seventeen (17) spray booths" to "monthly VOC emissions from the fiberglass spray operations (EU-1)." Please change all references of "seventeen (17) fiberglass spray, chop, and grind booths (ID No. EU-1)" to "seventeen (17) fiberglass spray or fiberglass grind booths".

Response #18

The Compliance Requirements section of the TSD has been revised to read as follows (changes in bold or strikeout):

16. The ~~seventeen (17) fiberglass spray, chop, and grind booths (ID No. EU-1)~~ **seven (7) gel coat booths (ID Nos. GC1 through GC7), the four (4) resin/chopper booths (ID Nos. C1 through C4), and the six (6) fiberglass grinding booths (ID Nos. G1 through G6)** have applicable compliance monitoring conditions as specified below:

(a) Total emissions of VOC shall not exceed ~~223.5~~ **244.5** tons per 12 consecutive month period, rolled on a monthly basis. ~~based on 35% flash off for non-vapor suppressed (NVS) gel coat spray layup and 13% flash off for NVS resin spray layup~~ **The emission factor representing the percent by weight of gel coat usage that is emitted and the emission factor representing the percent by weight of resin usage that is emitted, shall each be based on the styrene monomer content of the gel coat and resin, respectively, and shall be calculated using the reference approved by IDEM, OAM: "CFA Emission Models for the Reinforced Plastics Industries," Composites Fabricators Association, February 28, 1998.**

(b) Quarterly reports shall be submitted to OAM Compliance Section. These reports shall include total monthly VOC emissions for the seventeen (17) ~~spray~~ booths.

(c) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, ~~daily~~ **weekly** observations shall be made of the overspray **from the seven (7) gel coat booth stacks (S2, S3, S4, S5, S16, S17, and S18) and the four (4) resin/chopper booth stacks (S1, S6, S7, S14, and S15)** while one or more of the booths are in operation.

(d) ~~Weekly~~ **Monthly** inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The ~~Preventive Maintenance Plan~~ **Compliance Response Plan** for this unit shall contain troubleshooting contingency and response steps for when ~~an~~ **a noticeable change in** overspray emission, **or** evidence of overspray emission ~~or other abnormal emission~~ is observed.

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

These monitoring requirements are necessary to ensure that the requirements of 326 IAC 2-2 (PSD) do not apply, because the dry filters controlling PM emissions from the ~~seventeen (17) spray booths~~ **seven (7) gel coat booths (ID Nos. GC1 through GC7), the four (4) resin/chopper booths (ID Nos. C1 through C4), and the six (6) fiberglass grinding booths (ID Nos. G1 through G6)** must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and to ensure compliance with 326 IAC 2-7 (Part 70).

Comment #19

On page 2 of 4 TSD Appendix A, please change the transfer efficiency for the Black Paint coating. This coating is sprayed with an air assisted spray gun. Also, please change the Weight % Volatile of the Stypol Resin from 35.35% to 36.12%.

On page 3 of 4 TSD Appendix A, please change Lupersol catalyst volatiles and flash off percentages based on the attached technical information supplied by the manufacturer.

Response #19

Since the BACT requirements in this permit only apply to the application of gel coat and resin, the transfer efficiency for spraying of the Black Paint coating is changed from 77%, as required by 326 IAC 8-1-6 (BACT) for gel coat and resin spray layup, to 50%, a typical transfer efficiency for spraying flat pieces with an air assisted spray gun. Also, the weight % volatile for the Stypol resin has been changed to 36.12%. Based on a second review of the MSDS for the gel coat, the weight % volatiles has been changed to 35.45%. Page 2 of 4 TSD Appendix A has been revised to include the above changes.

Information was provided by the manufacturer of the Lupersol catalyst on how emissions of HAPs should be calculated based on the chemistry of the catalyst. The emission calculations for the HAP and VOC emissions now include Relative Weight Factors, based on the manufacturer's calculations, which are essentially the portion of the HAPs which flash off as VOCs. Pages 2 and 3 of 4 TSD Appendix A have been revised to include the above changes.

Based on the revised emission calculations per the above changes, new emission factors for resin and gel coat emissions, and new emission factors for natural gas combustion, the summary page of emissions, page 1 of 4 TSD Appendix A, has been revised accordingly. Also, the Limited Potential to Emit section of the TSD, page 4 of 9, is revised to read as follows (changes in bold):

Limited Potential to Emit

The table below summarizes the total limited potential to emit of the significant emission units.

	Limited Potential to Emit (tons/year)						
Process/ facility	PM	PM-10	SO_2	VOC	CO	NO_X	HAPs
Surface Coating	**16.3**	**16.3**	0.0	**244.5**	0.0	0.0	**238.6**
Total Emissions*	**16.9**	**16.9**	0.1	**249.0**	**6.9**	**8.2**	**238.6**

* Includes Insignificant Activity emissions (see Appendix A, 4 pages).

Comment #20

On page 4 of 4, TSD Appendix A, please change the Heat Input Capacity in MMBtu/hr from 17.74 to 18.75 for the insignificant combustion units.

Response #20

The total heat input capacity of the insignificant natural gas combustion units, on page 4 of 4 TSD Appendix A, has been changed from 17.74 to 18.75 MMBtu per hour.

Due to the model permit changes made to the Part 70 Operating permit, Charleston Corporation was given another opportunity to review the revised draft Part 70 Operating permit. On September 11, 1998, the Charleston Corporation submitted additional comments on the permit. A summary of the comments and responses is as follows:

Comment #1

The Quarterly Compliance Monitoring Report does not clarify what is to be monitored specifically. The Quarterly Compliance Monitoring Report is a redundant and overly burdensome requirement since the Annual Compliance Certification required under 326 IAC 2-7-6(5) already addresses the status of the source's compliance in a sufficient time frame and is adequate to evaluate and assure continuous compliance.

Response #1

As stated earlier, the Quarterly Compliance Monitoring Report required in the Part 70 Operating Permit is to affirm that the source is in continuous compliance with all the permit requirements. The Annual Compliance Certification is to be submitted with all documents that are required to be submitted by the permit and is to certify that all the information contained in those documents are true, accurate, and complete. This form is required in all Part 70 Operating Permits and will not be removed from this permit.

Comment #2

Condition D.1.1, PSD Minor Limit, of the Part 70 Operating permit should not refer to the six (6) fiberglass grinding booths.

Response #2

Since the fiberglass grinding booths are not spray booths, they are not a source of VOC emissions. Therefore, since condition D.1.1 refers to a VOC usage limit, the six (6) fiberglass grinding booths do not have to be included in the limit since there are no VOC emissions from these booths. Condition D.1.1 is revised to read as follows (changes in bold or strikeout):

D.1.1 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

The total usage of volatile organic compounds (VOC) from the seven (7) gel coat booths (ID Nos. GC1 through GC7) **and** the four (4) resin/chopper booths (ID Nos. C1 through C4)~~, and the six (6) fiberglass grinding booths listed in section D.2~~ shall be limited to no more than 244.48 tons of VOC per twelve (12) consecutive month period based on a maximum of 17.2% by weight of the gel coat (containing a maximum of 35.45% styrene monomer) usage being emitted and a maximum of 7.8% by weight of the resin (containing a maximum of 36.12% styrene monomer) usage being emitted. The emission factors were based on the reference approved by IDEM, OAM: "CFA Emission Models for the Reinforced Plastics Industries," Composites Fabricators Association, February 28, 1998. This usage limit is required to limit the source wide potential to emit of VOC to less than 250 tons per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

Comment #3

This Title V permit does not include any new sources or any increase in emissions, therefore, MACT is not applicable. Stating the actual percent by weight of the gel coat or resin (emission factor) in the permit actually limits the styrene monomer content through the CFA emission factor chart. Our original State Operating permit included a styrene content usage limit for resin of 38% through the BACT analysis for the modification to the original permitted source (CP 099-2879). Since the original permit (CP 099-4110) did not require a limit under 326 IAC 8-6-1 and this facility went through ENSR under Title V (however didn't have new construction or modification which would have increased emissions) the BACT for the modification is also applicable to this facility, therefore, the entire source should only be limited to a styrene content of less than or equal to 38% for resin. There was not a gel coat styrene content limit.

In condition D.1.1 of the Part 70 Operating permit, please delete "based on a maximum of 17.2% by weight of the gel coat (containing a maximum of 35.45% styrene monomer) usage being emitted and a maximum of 7.8% by weight of the resin (containing a maximum of 36.12% styrene monomer) usage being emitted" and replace with "based on emissions calculated with the appropriate emission factor as determined by the weight percent of styrene monomer content of the product per the CFA Emissions Models for the Reinforced Plastics Industries, February, 1998."

Response #3

The emission factors and styrene monomer contents listed in condition D.1.1 originally were based on the worst case resin and gel coat listed in the permit application. However, as long as VOC emissions from the seven (7) gel coat booths (ID Nos. GC1 through GC7) and the four (4) resin/chopper booths (ID Nos. C1 through C4) do not exceed 244.48 tons per year to avoid the requirements of 326 IAC 2-2 (PSD) and the styrene monomer content of the resin used in three (3) of the gel coat booths (ID Nos. GC5 through GC7) and one (1) of the resin/chopper booths (ID No. C4) does not exceed 38% by weight pursuant to 326 IAC 8-1-6 (BACT), a limit on the styrene monomer content of the gel coat and resin is not necessary. Therefore, condition D.1.1 has been further revised as follows (changes in bold or strikeout):

D.1.1 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

The total usage of volatile organic compounds (VOC) from the seven (7) gel coat booths (ID Nos. GC1 through GC7) and the four (4) resin/chopper booths (ID Nos. C1 through C4) shall be limited to no more than 244.48 tons of VOC per twelve (12) consecutive month period. **The emission factor representing the percent by weight of gel coat usage that is emitted and the emission factor representing the percent by weight of resin usage that is emitted, shall each be based on the styrene monomer content of the gel coat and resin, respectively, and shall be calculated using the reference approved by IDEM, OAM: "CFA Emission Models for the Reinforced Plastics Industries," Composites Fabricators**

Association, February 28, 1998. ~~based on a maximum of 17.2% by weight of the gel coat (containing a maximum of 35.45% styrene monomer) usage being emitted and a maximum of 7.8% by weight of the resin (containing a maximum of 36.12% styrene monomer) usage being emitted. The emission factors were based on the reference approved by IDEM, OAM: "CFA Emission Models for the Reinforced Plastics Industries," Composites Fabricators Association, February 28, 1998.~~ This usage limit is required to limit the source wide potential to emit of VOC to less than 250 tons per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

Comment #4

We should be allowed the use of additional emission reduction techniques to offset higher monomer content materials and averaging of materials to achieve our styrene content limit. We would like to use monthly volume weighted averaging to comply with this limit.

Response #4

Compliance with the 38% styrene content limit for the resin used in the three (3) gel coat booths (ID Nos. GC5 through GC7) and one (1) of the resin/chopper booths (ID No. C4) pursuant to 326 IAC 8-1-6 (BACT) may be demonstrated through the use of a monthly volume weighted average of the resins used in these booths. This monthly volume weighted average shall be determined by the following equation:

$$A = \Sigma (C \times U) / \Sigma U$$

Where: A is the volume weighted average weight percent styrene
C is the weight percent styrene in each resin used
U is the usage rate of each resin in gallons per month

Condition D.1.6 has been revised as follows (changes in bold or strikeout):

D.1.6 Volatile Organic Compounds (VOC)

(a) Compliance with the VOC content and usage limitations contained in Condition~~s~~ D.1.1 ~~and D.1.2~~ shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

(b) Compliance with the styrene content limit contained in Condition D.1.2 shall be determined using monthly volume weighted averaging of the resins used in the three (3) gel coat booths (ID Nos. GC5 through GC7) and one (1) of the resin/chopper booths (ID No. C4). This monthly volume weighted average shall be determined by the following equation:

$A = \Sigma (C \times U) / \Sigma U$

Where: A is the volume weighted average weight percent styrene
C is the weight percent styrene in each resin used
U is the usage rate of each resin in gallons per month

Condition D.1.8 (now re-numbered as D.1.10) is again revised to include record keeping of the volume weighted average styrene content of the resins used. The condition now reads as follows (changes in bold or strikeout):

D.1.10 Record Keeping Requirements

(a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through ~~(5)~~ **(6)** below. Records maintained for (1) through ~~(5)~~ **(6)** shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC emission limits established in Conditions D.1.1 and D.1.2.

(1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those used as cleanup solvents and other solvents;

(2) A log of the dates of use;

(3) The cleanup solvent usage for each month;

(4) The total VOC usage for each month; ~~and~~

(5) The weight of VOCs emitted for each compliance period; **and**

(6) The volume weighted styrene content of the resins used for each month.

(b) To document compliance with Conditions D.1.8 and D.1.9, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

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

Comment #5

As previously stated in my December 17, 1997, the unit described as being an unpermitted facility in the Unpermitted Emission Units and Pollution Control section of the TSD and in the State Rule Applicability - Individual Facilities section of the TSD in the discussion of 326 IAC 8-1-6, was not actually “unpermitted”. The original application included the maximum potential emissions based off of the 5 booths (three (3) gel coat and one (1) chop with two (2) spray gun systems). The grinding booths (G5 and G6) are not spray booths and were not included in the VOC calculations used to determine maximum potential. During a recent IDEM, OAM inspection, the inspector stated that this is not an enforceable issue based on his subsequent review of the original application submission. This unit, therefore, should not constitute an enforcement action since this was not an addition nor an increase in emissions.

Response #5

In a memo from Eric Courtright, the inspector for this source, to Herm Carney of the Air Compliance Section of IDEM, dated December 30, 1997, Eric Courtright stated that when he performed an inspection of the source on July 9, 1997, he determined that an error was made in the review of construction permit CP 099-2879. He stated that the original construction permit application included the resin/chopper booth (ID No. C4) but it was not addressed in the permit. Therefore, limited liability should not be initiated for this booth. There will be no enforcement actions for this booth, but it will still be listed as an unpermitted booth since it was not listed in the previous construction permit. This will also be noted in the Enforcement Issue section of the TSD. Part (b) of the Enforcement Issue section of the TSD is revised to read as follows:

(b) ~~IDEM is reviewing this matter and will take appropriate action.~~ **Based on an inspection of the source on July 9, 1997, it was determined by the inspector that an error was made in review of CP-099-2879-00037. The resin/chopper booth (ID No. C4) was included in the original construction permit application, but was not included in the permit. Therefore, there will be no enforcement action taken as a result of this error.** This proposed permit is intended to satisfy the requirements of the construction permit rules.

Comment #6

In conditions D.1.3 and D.2.1 of the Part 70 Operating Permit, the requirement that the overspray shall not be visibly detectable at the exhaust and shall not be accumulated at the rooftops or on the ground should be reworded such that overspray shall not be abnormally visibly detectable at the exhaust and there shall not be abnormal accumulation at the rooftops or on the ground.

Response #6

Conditions D.1.3 and D.2.1 of the Part 70 Operating Permit are further revised to read as follows (changes in bold):

D.1.3 Particulate Matter (PM) [326 IAC 6-3-2(c)]

(b) The PM overspray from the seven (7) gel coat booths (ID Nos. GC1 through GC7) and the four (4) resin/chopper booths (ID Nos. C1 through C4) shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

(b) Overspray from the seven (7) gel coat booths (ID Nos. GC1 through GC7) and the four (4) resin/chopper booths (ID Nos. C1 through C4) shall not be **abnormally** visibly detectable at the exhaust.

(c) Overspray from the seven (7) gel coat booths (ID Nos. GC1 through GC7) and the four (4) resin/chopper booths (ID Nos. C1 through C4) shall not be **abnormally** accumulated at the rooftops or on the ground.

D.2.1 Particulate Matter (PM) [326 IAC 6-3]

(a) Pursuant to 326 IAC 6-3 (Process Operations), the total allowable PM emission rate from the six (6) fiberglass grinding booths (ID Nos. G1 through G6) shall not exceed 3.5 pounds per hour when operating at a total process weight rate of 1,600 pounds per hour (100 pounds per part, heaviest part).

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

Interpolation and extrapolation 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

(b) Particulate matter emissions from the six (6) fiberglass grinding booths (ID Nos. G1 through G6) shall not be **abnormally** visibly detectable at the exhaust.

(c) Particulate matter emissions from the six (6) fiberglass grinding booths (ID Nos. G1 through G6) shall not be **abnormally** accumulated at the rooftops or on the ground.

Comment #7

In Condition D.1.9 of the Part 70 Operating Permit, daily inspection on the placement of filters and of the overspray and weekly inspections of the coating stacks is overly burdensome. We could perform these functions once per month to ease the personnel burden and the paperwork burden of documenting compliance with this requirement.

Response #7

See item 44 of the OAM revisions to the Part 70 Operating Permit, on page 24 above, for the revised condition D.1.9.

Comment #8

The VOC emission calculations for the Lupersol Catalyst did not take into account the relative weight factors previously submitted in the original comment package. Please use the relative weight factors to correctly calculate the emissions from this product.

Response #8

The VOC emission calculations for the Lupersol Catalyst have been revised to include the relative weight factors for the dimethyl phthalate and methyl ethyl ketone portion of the total volatile organics. See the revised pages 1 through 3 of Appendix A. See Response #19 on page 35 above for the revised Limited Potential to Emit table of the TSD.

Appendix A: Emissions Calculations
Form DD: Reinforced Plastics and Composites
Fiberglass Processes

Company Name: Charleston Corporation
Address City IN Zip: U.S. 6 and Dogwood, Bremen, Indiana 46506
Operation Permit No.: T099-6954
Plt ID: 099-00037
Reviewer: Trish Earls/EVP
Date: November 3, 1998

State Potential Emissions (uncontrolled):

Material (as applied)	Emission Unit ID	Density (Lb/Gal)	Weight % Styrene Monomer or VOC	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Emission Factor % of Resin/ Gel Coat Weight	Gal of Mat (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential ton/yr	lb VOC /gal solids	Transfer Efficiency
Black Paint	GC1	7.25	84.00%	0.00%	84.00%	0.00%	11.95%	N/A	0.0260	16.00	6.1	6.09	2.53	60.80	11.10	1.06	101.92	50.00%
White Gel Coat	GC1-GC7	10.87	35.45%	0.00%	35.45%	0.00%	48.32%	17.20%	1.8400	16.00	3.9	3.85	55.04	1321.01	241.08	208.10	10.36	77.00%
Stypol Resin	C1-C4	9.21	36.12%	0.00%	36.12%	0.00%	60.00%	7.80%	8.7800	16.00	3.3	3.33	100.95	2422.87	442.17	832.90	7.20	77.00%
Lupersol Catalyst	GC1-GC7, C1-C4	9.03	99.00%	1.00%	98.00%	0.00%	0.00%	N/A	0.1500	16.00	8.8	8.85	16.74	401.65	73.30	0.22	N/A	77.00%
Release Agent	GC1-GC7, C1-C4	6.56	70.00%	0.00%	70.00%	0.00%	30.00%	N/A	0.0366	16.00	4.6	4.59	2.69	64.51	11.77	0.00	15.31	100.00%
Super Blue Resin Cleaner	GC1-GC7, C1-C4	8.83	86.38%	79.50%	6.88%	0.00%	0.00%	N/A	0.0065	16.00	0.6	0.61	0.06	1.51	0.27	0.00	N/A	100.00%
Super Flush	GC1-GC7, C1-C4	8.86	100.00%	0.00%	100.00%	0.00%	0.00%	N/A	0.0041	16.00	8.9	8.86	0.58	13.82	2.52	0.00	N/A	100.00%
Total State Potential Emissions:													**178.59**	**4286.18**	**782.23**	**1042.27**		

Federal Potential Emissions (controlled):

	Material Usage Limitation	Control Efficiency: VOC	Control Efficiency: PM	Controlled VOC lbs per Hour	Controlled VOC lbs per Day	Controlled VOC tons per Year	Controlled PM tons/yr
tal Federal Potential Emissions:	31.25%	0.00%	95.00%	**55.82**	**1339.62**	**244.48**	**16.29**

Note:
At a 31.25% material usage limitation, VOC emissions are limited to 244.48 tons per year for a source wide total of 249.0 tons per year, therefore, the requirements of 326 IAC 2-2 (PSD) do not apply.

Methodology:
Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Potential VOC Pounds per Hour (for resin and gel coat) = Density of coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * Emission Factor
Potential VOC Pounds per Day (for resin and gel coat) = Density of coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day) * Emission Factor
Potential VOC Tons per Year (for resin and gel coat) = Density of coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs) * Emission Factor
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids) * Transfer Efficiency
Total = Sum of all materials and solvents used
Controlled emission rate = uncontrolled emission rate * (1 - control efficiency)
Emission Factors are based on new AP42 factors which were taken from the "CFA Emission Models for the Reinforced Plastics Industries", February, 1998.
For Lupersol Catalyst, VOC emissions were calculated based on manufacturer's information on flash off percentages for the HAPs in the catalyst. The Relative Weight Factors for Dimethyl Phthalate and MEK are 0.001 and 1.0, respectively.

Appendix A: Emission Calculations
HAP Emissions - Potential to Emit

Company Name: Charleston Corporation
Address City IN Zip: U.S. 6 and Dogwood, Bremen, Indiana 46506
Operation Permit No.: T099-6954
PIt ID: 099-00037
Reviewer: Trish Earls/EVP
Date: November 3, 1998

Potential To Emit

Material	Emission Unit ID	Density (lb/gal)	Gal of Mat (gal/unit)	Maximum Production (unit/hr)	Emission Factor	Weight % Styrene	Weight % Xylene	Weight % Toluene	Weight % Triethylamine	Weight % Methyl Methacrylate	Weight % Dimethyl Phthalate	Weight % Methyl Ethyl Ketone	Weight % Glycol Ethers	Material Usage Limitation	Styrene Emissions (tons/yr)	Xylene Emissions (tons/yr)	Toluene Emissions (tons/yr)	Triethylamine Emissions (tons/yr)	Methyl Methacrylate Emissions (tons/yr)	Dimethyl Phthalate Emissions (tons/yr)	Methyl Ethyl Ketone Emissions (tons/yr)	Glycol Ethers Emissions (tons/yr)
Black Paint	GC1	7.25	0.0260	16.00	N/A	0.00%	8.40%	62.00%	1.00%	0.00%	0.00%	0.00%	0.00%	31.25%	0.00	0.35	2.56	0.04	0.00	0.00	0.00	0.00
White Gel Coat	GC1-GC7	10.87	1.8400	16.00	17.20%	30.53%	0.00%	0.00%	0.00%	4.92%	0.00%	0.00%	0.00%	31.25%	75.34	0.00	0.00	0.00	21.55	0.00	0.00	0.00
Stypol Resin	C1-C4	9.21	8.7800	16.00	7.80%	35.35%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	31.25%	138.18	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Lupersol Catalyst	GC1-GC7, C1-C4	9.03	0.1500	16.00	N/A	0.00%	0.00%	0.00%	0.00%	0.00%	20.80%	1.00%	0.00%	31.25%	0.00	0.00	0.00	0.00	0.00	0.01	0.30	0.00
Release Agent	GC1-GC7, C1-C4	6.56	0.0366	16.00	N/A	0.00%	2.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	31.25%	0.00	0.11	0.00	0.00	0.00	0.00	0.00	0.00
Super Blue Resin Cleaner	GC1-GC7, C1-C4	8.83	0.0065	16.00	N/A	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	10.00%	31.25%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.12
Super Flush	GC1-GC7, C1-C4	8.86	0.0041	16.00	N/A	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	31.25%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
															213.52	0.45	2.56	0.04	21.55	0.01	0.30	0.12

Total State Potential Emissions: 238.55

Methodology:
HAPs emission rate (tons/yr) = density (lb/gal) * (gal/unit) * (units/hour) * weight % HAP * % Flash Off * (8,760 hrs/yr) * (1 ton/2,000 lb)
HAPs emission rate for Lupersol Catalyst (tons/yr) = density (lb/gal) * (gal/unit) * (units/hour) * weight % HAP * Relative Weight Factor * (8,760 hrs/yr) * (1 ton/2,000 lb)
For Lupersol Catalyst, HAP emissions were calculated based on manufacturer's information on flash off percentages for the HAPs in the catalyst. The Relative Weight Factors for Dimethyl Phthalate and MEK are 0.001 and 1.0, respectively.

Appendix A: Emission Calculations

Company Name: Charleston Corporation
Address City IN Zip: U.S. 6 and Dogwood, Bremen, Indiana 46506
Operation Permit No.: T099-6954
Plt ID: 099-00037
Reviewer: Trish Earls/EVP
Date: November 3, 1998

Total Potential To Emit (tons/year)

	Emissions Generating Activity		
Pollutant	Surface Coating	Insignificant Activities	**TOTAL**
PM	1042.27	3.07	1045.34
PM10	1042.27	3.07	1045.34
SO2	0.00	0.05	0.05
NOx	0.00	8.21	8.21
VOC	782.23	4.52	786.75
CO	0.00	6.90	6.90
total HAPs	238.55	0.00	238.55
worst case single HAP	213.52	0.00	213.52

Total emissions based on rated capacities at 8,760 hours/year.
*Insignificant Activity Emissions represent emissions from natural gas combustion, final finish fiberglass repair, usage of mold making paint, fillers, and sealants, grinding operations, and storage tanks.
**For the purposes of determining Title V applicability, PM10 (not PM) is the regulated pollutant in consideration

Limited Potential to Emit (tons/year)

	Emissions Generating Activity		
Pollutant	Surface Coating	Insignificant Activities	**TOTAL**
PM	16.29	0.65	16.94
PM10	16.29	0.65	16.94
SO2	0.00	0.05	0.05
NOx	0.00	8.21	8.21
VOC	244.48	4.52	249.00
CO	0.00	6.90	6.90
total HAPs	238.55	0.00	238.55
worst case single HAP	213.52	0.00	213.52

Total emissions based on rated capacities at 8,760 hours/year.
*Insignificant Activity Emissions represent emissions from natural gas combustion, final finish fiberglass repair, usage of mold making paint, fillers, and sealants, grinding operations, and storage tanks.
**For the purposes of determining Title V applicability, PM10 (not PM) is the regulated pollutant in consideration

Appendix A: Emission Calculations
Insignificant Natural Gas Combustion
MM Btu/hr 0.3 - < 100

Company Name: Charleston Corporation
Address City IN Zip: U.S. 6 and Dogwood, Bremen, Indiana 46506
Operation Permit No.: T099-6954
Plt ID: 099-00037
Reviewer: Trish Earls/EVP
Date: August 7, 1998

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
18.75	164.3

Heat Input Capacity includes:
Insignificant natural gas fired combustion units with a total heat input of 18.75 MMBtu/hr.

	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	7.6	7.6	0.6	100.0	5.5	84.0
Potential Emission in tons/yr	0.62	0.62	0.05	8.21	0.45	6.90

Methodology:
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas
Emission Factors for NOx: uncontrolled = 100, Low Nox Burner = 50, Flue gas recirculation = 32
All PM is assumed to be less than 1.0 micrometer in diameter. Therefore, the PM emission factors may be used to estimate PM10, PM2.5, and PM1 emissio
Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors from AP 42, Chapter 1.4, Tables 1.4-1 and 1.4-2, SCC #1-01-006-02, #1-02-006-02, #1-03-006-02, #1-03-006-03
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton