

# **PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY**

**Covermaster, Inc.  
57784 C.R. 3  
Elkhart, Indiana 46517**

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

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

Operation Permit No.: T039-7354-00137	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: April 18, 2001 Expiration Date: April 18, 2006

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## SECTION A

## SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

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

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The Permittee owns and operates a stationary fiberglass truck cap and component manufacturing source.

Responsible Official:	Dillard Fletcher, President
Source Address:	57784 C.R. 3, Elkhart, Indiana 46517
Mailing Address:	57784 C.R. 3, Elkhart, Indiana 46517
SIC Code:	3799
County Location:	Elkhart
Source Location Status:	Attainment for all criteria pollutants Attainment for all other criteria pollutants
Source Status:	Part 70 Permit Program Major 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)]

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This stationary source consists of the following emission units and pollution control devices, which are separated listed under two (2) groups identified by the source as Plant #1 and Plant #2, corresponding to onsite production Buildings #1 and #2, respectively:

#### Plant #1:

- (a) One (1) resin chop coat booth identified as B-1, constructed October 11, 1995, producing a maximum of 8.125 fiberglass units per hour, equipped with a high volume low pressure (HVLP) spray application system consisting of one (1) airless chop gun and dry filter for particulate matter overspray control, and exhausting at one (1) stack identified as SV-1.
- (b) One (1) gel coat application booth identified as B-2, constructed October 11, 1995, producing a maximum of 8.125 fiberglass units per hour, equipped with a high volume low pressure (HVLP) spray application system consisting of three (3) spray guns for color changes, using only one (1) gun at a time, and dry filter for particulate matter overspray control, and exhausting at one (1) stack identified as SV-2.
- (c) One (1) cut and grind booth identified as B-4, constructed October 11, 1995, processing 656 pounds of fiberglass product per hour, equipped with four (4) Torit dust collectors for particulate matter control respectively identified as GRDC-1, GRDC-2, GRDC-3 and GRDC-4, each exhausting inside the building.
- (d) One (1) mold construction and rail assembly booth identified as B-5, constructed October 20, 1995, producing a maximum of 8.125 fiberglass units per hour and 1 mold per month, equipped with one (1) airless resin chop gun and dry filter for particulate matter overspray control, and exhausting at one (1) stack identified as SV-5.

- (e) One (1) spray paint booth identified as B-6, constructed October 20, 1995, coating a maximum of 8.125 fiberglass units per hour, equipped with a high volume low pressure (HVLP) spray application system consisting of two (2) spray guns and dry filter for particulate matter overspray control, and exhausting at four (4) stacks collectively identified as SV-6.
- (f) One (1) gel coat application booth identified as B-7, producing a maximum of 10 fiberglass truck caps and parts per hour, equipped with a high volume low pressure (HVLP) spray application system consisting of three (3) spray guns for color changes, using only one (1) gun at a time, and dry filter for particulate matter overspray control, and exhausting at one (1) stack identified as SV-7.
- (g) One (1) resin chop coat booth identified as B-8, producing a maximum of 10 fiberglass truck caps and parts per hour, equipped with one (1) flow coater chop gun and dry filter for particulate matter overspray control, and exhausting at one (1) stack identified as SV-8.
- (h) Two (2) product preparation booths, identified as Prep Booth B-1 and Prep Booth B-2, containing grinders, cutters and buffers and processing up to a total of 650 pounds of fiberglass product per hour, each equipped with a filter bank system for particulate matter control and exhausting inside the building.

Plant #2:

- (a) One (1) paint booth constructed July 16, 1998, coating a maximum of 195 fiberglass truck caps per day, equipped with a high volume low pressure (HVLP) spray application system consisting of one (1) basecoat gun and one (1) clear coat gun and dry filter for particulate matter overspray control, and exhausting at two (2) stacks identified as SV-14 and SV-15.
- (b) One (1) mold repair area consisting of three (3) fiberglass mold production booths, constructed July 16, 1998, producing a maximum of 12 molds per week, equipped with a total of two (2) high volume low pressure (HVLP) spray guns and one (1) flow coater chop gun, with dry filter for particulate matter overspray control, and exhausting at three (3) stacks SV-16 through SV-18.
- (c) One (1) production area constructed July 16, 1998, producing a maximum of 195 fiberglass truck caps per day and consisting of:
  - (1) One (1) chop booth equipped with one (1) flow coater chop gun exhausting at two (2) stacks identified as SV-1 and SV-2, and
  - (2) One (1) gel coat application booth equipped with a high volume low pressure (HVLP) spray application system consisting of three (3) spray guns for color changes, using only one (1) gun at a time, with dry filter for particulate matter overspray control, and exhausting at one (1) stack identified as SV-3.
- (d) One Plant #2 Grind Booth for miscellaneous cutting and sanding operations for fiberglass and wood, constructed July 16, 1998, processing 730 pounds of product per hour, consisting of twelve (12) DA sanders, six (6) buffers, three (3) hand cutters, two (2) band saws, and two (2) table saws, exhausting at one (1) stack identified as SV-7.

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

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

- (a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6, including two (2) Safety-Kleen wash tanks each at a capacity of 660 gallons and containing pure grade lacquer thinner. [326 IAC 8-3-2] [326 IAC 8-3-5]
- (b) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment and welding equipment, including two (2) welders. [326 IAC 6-3-2]

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

## SECTION B GENERAL CONDITIONS

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

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

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

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

### B.3 Enforceability [326 IAC 2-7-7]

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

### B.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

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

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

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

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

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

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(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 Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

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

(b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality. [326 IAC 2-7-5(6)(E)]

(c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 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, except those specifically designated as not federally enforceable, 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.
- (c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in condition B, Emergency Provisions.

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

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

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

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

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
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, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
  - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;
  - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
  - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

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

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

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) 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; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs 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 Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

The PMP and the PMP extension notification do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.

- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

B.12 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, 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, OAQ, and IDEM - Northern Regional Office, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

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

Telephone Number: 317-233-5674 (ask for Compliance Section)

Facsimile Number: 317-233-5967

Telephone No.: 1-800-753-5519 (IDEM Northern Regional Office)

Facsimile No.: 219-245-4877 (IDEM Northern Regional Office)

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

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, 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). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) 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.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

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

- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. All previously issued operating permits are superseded by this permit.
- (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, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (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. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (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, OAQ, 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, OAQ, has issued the modification. [326 IAC 2-7-12(b)(7)]

**B.14 Multiple Exceedances [326 IAC 2-7-5(1)(E)]**

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

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

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

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report.

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

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit 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) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.

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

- (c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

**B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]**

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

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

- (1) That this permit contains a material mistake.

- (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
- (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

**B.17 Permit Renewal [326 IAC 2-7-4]**

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- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, 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, OAQ, on or before the date it is due.
  - (2) If IDEM, OAQ, 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, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.

- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]  
If IDEM, OAQ, 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.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]**

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

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

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, 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).

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

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

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

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

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

- (4) The Permittee notifies the:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, 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, OAQ, in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

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

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

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

- (c) Emission Trades [326 IAC 2-7-20(c)]  
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

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

A modification, construction, or reconstruction is governed by 326 IAC 2 and 326 IAC 2-7-10.5.

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

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

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy any records that must be kept under the conditions of this permit;
- (c) Inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor 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.

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

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

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

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

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

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

## SECTION C

## SOURCE OPERATION CONDITIONS

Entire Source

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

- C.1 **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.2 **Opacity [326 IAC 5-1]**  
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
  - (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- C.3 **Open Burning [326 IAC 4-1] [IC 13-17-9]**  
The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.
- C.4 **Incineration [326 IAC 4-2] [326 IAC 9-1-2]**  
The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.
- C.5 **Fugitive Dust Emissions [326 IAC 6-4]**  
The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.
- C.6 **Operation of Equipment [326 IAC 2-7-6(6)]**  
Except as otherwise provided by statute, rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.
- C.7 **Stack Height [326 IAC 1-7]**  
The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4(d)(3), (e), and (f), and 326 IAC 1-7-5(d) are not federally enforceable.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Quality  
100 North Senate Avenue, 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 applicable 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 applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **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]**

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

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

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

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

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ, not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

### **Compliance Requirements [326 IAC 2-1.1-11]**

#### **C.10 Compliance Requirements [326 IAC 2-1.1-11]**

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

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

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

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

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, 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).

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

**C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]**

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

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

**C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]**

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

- (a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on October 14, 1998.
- (b) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (c) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

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

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

- (a) A compliance schedule for meeting the requirements of 40 CFR 68; or
- (b) As a part of the annual 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).

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]**

(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. The compliance monitoring plan can be either an entirely new document, consist in whole of information contained in other documents, or consist of a combination of new information and information contained in other documents. If the compliance monitoring plan incorporates by reference information contained in other documents, the Permittee shall identify as part of the compliance monitoring plan the documents in which the information is found. The elements of the compliance monitoring plan are:

- (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, OAQ, upon request and shall be subject to review and approval by IDEM, OAQ. 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) Reasonable response steps that may 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 reasonable 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, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to take reasonable response steps may constitute a violation of the permit.
- (c) Upon investigation of a compliance monitoring excursion, the Permittee is excused from taking further response steps for any of the following reasons:
- (1) A false reading occurs due to the malfunction of the monitoring equipment. 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.
  - (3) An automatic measurement was taken when the process was not operating.
  - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) 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.
- (e) All monitoring required in Section D shall be performed at all times the equipment is operating. If monitoring is required by Section D and the equipment is not operating, then the Permittee may record the fact that the equipment is not operating or perform the required monitoring.

- (f) At its discretion, IDEM may excuse the Permittee's failure to perform the monitoring and record keeping as required by Section D, if the Permittee provides adequate justification and documents that such failures do not exceed five percent (5%) of the operating time in any quarter. Temporary, unscheduled unavailability of qualified staff shall be considered a valid reason for failure to perform the monitoring or record keeping requirements in Section D.

**C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]  
[326 IAC 2-7-6]**

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

The 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]**

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- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 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 estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
  - (2) Indicate estimated actual emissions of other regulated pollutants (as defined by 326 IAC 2-7-1) from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:

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

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

- (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, OAQ, on or before the date it is due.

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

- (a) Records of all required data, reports 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. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

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

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, 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, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly or semi-annual report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) 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. Reporting periods are based on calendar years.

## **Stratospheric Ozone Protection**

### **C.20 Compliance with 40 CFR 82 and 326 IAC 22-1**

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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)]

#### Plant #1:

- (a) One (1) resin chop coat booth identified as B-1, constructed October 11, 1995, producing a maximum of 8.125 fiberglass units per hour, equipped with a high volume low pressure (HVLP) spray application system consisting of one (1) airless chop gun and dry filter for particulate matter overspray control, and exhausting at one (1) stack identified as SV-1.
- (b) One (1) gel coat application booth identified as B-2, constructed October 11, 1995, producing a maximum of 8.125 fiberglass units per hour, equipped with a high volume low pressure (HVLP) spray application system consisting of three (3) spray guns for color changes, using only one (1) gun at a time, and dry filter for particulate matter overspray control, and exhausting at one (1) stack identified as SV-2.
- (c) One (1) cut and grind booth identified as B-4, constructed October 11, 1995, processing 656 pounds of fiberglass product per hour, equipped with four (4) Torit dust collectors for particulate matter control respectively identified as GRDC-1, GRDC-2, GRDC-3 and GRDC-4, each exhausting inside the building.
- (d) One (1) mold construction and rail assembly booth identified as B-5, constructed October 20, 1995, producing a maximum of 8.125 fiberglass units per hour and 1 mold per month, equipped with one (1) airless resin chop gun and dry filter for particulate matter overspray control, and exhausting at one (1) stack identified as SV-5.
- (e) One (1) spray paint booth identified as B-6, constructed October 20, 1995, coating a maximum of 8.125 fiberglass units per hour, equipped with a high volume low pressure (HVLP) spray application system consisting of two (2) spray guns and dry filter for particulate matter overspray control, and exhausting at four (4) stacks collectively identified as SV-6.

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

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

#### D.1.1 NESHAPs [326 IAC 20] [40 CFR Part 63]

Currently there are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 20 and 40 CFR Part 63) applicable to this source. However, the United States Environmental Protection Agency (US EPA) has established the *Reinforced Plastic Composites Production* and the *Plastic Parts and Products (Surface Coating)* source categories as those requiring hazardous air pollutant control and has tentatively established August 2001 and December 2001 as the final rule promulgation dates, respectively. The source shall evaluate applicability to each rule upon its promulgation and shall comply with the applicable rules.

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

Pursuant to CP-039-4510-00137, issued on October 11, 1995, compliance with 326 IAC 8-1-6 ((New Facilities: General Reduction Requirements) shall be achieved with the best available control technology (BACT) for chop coat booth B-1; gel coat booth B-2; mold construction booth B-5; and spray paint booth B-6, as follows:

- (a) Utilize low styrene concentration in the resin used in chop coat booth B-1 and gel coat booth B-2;
- (b) Utilize high quality resin and gel coat in mold construction booth B-5, also reduce the quantity of mold construction which would be one (1) mold construction per month;

- (c) Low VOC content and high solids in the paint shall be used in paint booth B-6;
- (d) Low VOC resin shall be used in the rail assembly at mold construction booth B-5;
- (e) All paint guns shall be high volume low pressure (HVLP) resulting in less usage with the high transfer efficiency of 75 percent;
- (f) The solvent used to clean up spray guns and other tools shall be discharged into containers, and these containers shall be covered at all other times.
- (g) The total VOC input to facilities B-1, B-2, B-3, B-5 and B-6, including VOC solvent usage, minus VOC solvent shipped out, shall be limited such that the potential to emit VOC is limited to 138.0 tons per twelve (12) consecutive month period. Compliance with this condition shall be based on the following:
  - (1) When applying gel coats and resins, VOC emissions shall be calculated by multiplying the material usage by the appropriate emission factor based on the monomer content, method of application, and other emission reduction techniques, and summing the emissions for all gel coats and resins. Emission factors shall be obtained from the reference approved by IDEM, OAQ.
  - (2) Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA- approved form, emission factors for the gel coat and resin applications shall be taken from the following reference approved by IDEM, OAQ: "CFA Emission Models for the Reinforced Plastics Industries," Composites Fabricators Association, February 28, 1998 (updated as the "Unified Emission Factors for Open Molding of Composites" ("CFA Factors", April 1999). For the purposes of these emission calculations, monomer in resins and gel coats that is not styrene shall be considered as styrene on an equivalent weight basis.
  - (3) When applying coatings and VOC solvents other than gel coats and resins, VOC emissions shall be calculated using an emission factor of 2,000 pounds of VOC emitted per ton of VOC used.

D.1.3 PSD Minor Status [326 IAC 2-2] [40 CFR 52.21]

Compliance with Conditions D.1.2 and D.3.2 shall limit the potential emissions of volatile organic compounds (VOC) of the facilities listed at Sections D.1 and D.3 to less than 250 tons per twelve (12) consecutive month period. Any change or modification to the facilities listed at Sections D.1 and D.3 which may increase VOC usage to 250 tons per twelve (12) consecutive month, or greater, shall require OAQ's prior approval before such change can take place. Therefore the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.

**D.1.4 Particulate Matter (PM) [326 IAC 6-3-2]**

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Pursuant to 326 IAC 6-3-2(c), particulate matter emissions shall be limited as follows:

- (a) Particulate matter as overspray from the resin chop coat booth B-1, gel coat application booth B-2, mold construction and rail assembly booth B-5, and spray paint booth B-6, each shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

or

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

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour.}$$

- (b) The allowable PM emission rate from cut and grind booth B-4 shall not exceed 1.94 pounds per hour when operating at a process weight rate of 656 pounds per hour. The pounds per hour limitation was calculated with the following equation:

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

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

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

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

**Compliance Determination Requirements**

**D.1.6 Volatile Organic Compounds (VOC)**

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Compliance with the VOC content and usage limitations contained in Condition 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.

**D.1.7 VOC Emissions**

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Compliance with Condition D.1.2 shall be demonstrated within 30 days of 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)**

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In order to comply with Condition D.1.4, the dry filters for PM control shall be in operation at all times when the resin chop coat booth B-1, gel coat application booth B-2, mold construction and rail assembly booth B-5, and the spray paint booth B-6 are in operation.

#### D.1.9 Volatile Organic Compounds (VOC)

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Pursuant to CP 039-4510-00137, issued on October 11, 1995, the exhaust fans associated with stacks S/V-5 and S/V-6 shall be in operation at all times when the mold construction and rail assembly booth B-5 and spray paint booth B-6, respectively, are in operation.

#### D.1.10 Monitoring

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- (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 surface coating booth stacks SV-1, SV-2, SV-5 and SV-6 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 stacks 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.1.11 Record Keeping Requirements

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- (a) To document compliance with Conditions D.1.2(b) and (g), the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.2.
  - (1) The usage by weight and monomer content of each resin and gel coat used, and the usage by weight 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 added to coatings and those used as cleanup solvents;
  - (2) A log of the dates of use;
  - (3) Number of molds constructed for each month; and
  - (4) The calculated total volatile organic compounds (VOC) emitted from all coatings, including resin and gel coat usage, for each month and for the compliance period.
- (b) To document compliance with Conditions D.1.8 and D.1.10, 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.1.12 Reporting Requirements

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

## SECTION D.2

## FACILITY OPERATION CONDITIONS

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

#### Plant #1

- (f) One (1) gel coat application booth identified as B-7, producing a maximum of 10 fiberglass truck caps and parts per hour, equipped with a high volume low pressure (HVLP) spray application system consisting of three (3) spray guns for color changes, using only one (1) gun at a time, and dry filter for particulate matter overspray control, and exhausting at one (1) stack identified as SV-7.
- (g) One (1) resin chop coat booth identified as B-8, producing a maximum of 10 fiberglass truck caps and parts per hour, equipped with one (1) flow coater chop gun and dry filter for particulate matter overspray control, and exhausting at one (1) stack identified as SV-8.
- (h) Two (2) product preparation booths, identified as Prep Booth B-1 and Prep Booth B-2, containing grinders, cutters and buffers and processing up to a total of 650 pounds of fiberglass product per hour, each equipped with a filter bank system for particulate matter control and exhausting inside the building.

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

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

#### D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

Pursuant to Significant Source Modification 039-12770-00137, issued January 26, 2001, and the BACT determination under 326 IAC 8-1-6, operating conditions for booths B-7 and B-8 shall be the following:

- (c) Use of resins, gel coats and clean-up solvents, as well as VOC delivered to the applicators, shall be limited such that the potential to emit (PTE) VOC from resin and gel coat applications shall be limited to less than 100 tons per twelve (12) consecutive month period. Compliance with this limit shall be determined based upon the following criteria:
  - (1) Monthly usage by weight, monomer content, method of application, and other emission reduction techniques for each gel coat and resin shall be recorded. VOC emissions shall be calculated by multiplying the usage of each gel coat and resin by the emission factor that is appropriate for the monomer content, method of application, and other emission reduction techniques for each gel coat and resin, and summing the emissions for all gel coats and resins. Emission factors shall be obtained from the reference approved by IDEM, OAQ.
  - (2) Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA- approved form, emission factors shall be taken from the following reference approved by IDEM, OAQ: "CFA Emission Models for the Reinforced Plastics Industries," Composites Fabricators Association, February 28, 1998, or its update, and shall not exceed 32.3% styrene emitted per weight of gel coat applied and 17.7% styrene emitted per weight of resin applied. For the purposes of these emission calculations, monomer in resins and gel coats that is not styrene shall be considered as styrene on an equivalent weight basis.
  - (3) When applying coatings and VOC solvents other than gel coats and resins, VOC emissions shall be calculated using an emission factor of 2,000 pounds of VOC emitted per ton of VOC used.

- (d) Resins and gel coats used, including filled resins and tooling resins and gel coats, shall be limited to maximum monomer contents of 35 percent (35%) by weight for resins, 37 percent (37%) by weight for gel coats or their equivalent on an emissions mass basis. Monomer contents shall be calculated on a neat basis, i.e., excluding any filler. Compliance with these monomer content limits shall be demonstrated on a monthly basis.

The use of resins with monomer contents lower than 35%, gel coats with monomer contents lower than 37%, and/or additional emission reduction techniques approved by IDEM, OAQ, may be used to offset the use of resins with monomer contents higher than 35%, and/or gel coats with monomer contents higher than 37%. Examples of other techniques include, but are not limited to, lower monomer content resins and gel coats, closed molding, vapor suppression, vacuum bagging, controlled spraying, or installing a control device with an overall reduction efficiency of 95%. This is allowed to meet the monomer content limits for resins and gel coats, and shall be calculated on an equivalent emissions mass basis as shown below:

$(\text{Emissions from } >35\% \text{ resin or } >37\% \text{ gel coat}) - (\text{Emissions from } 35\% \text{ resin or } 37\% \text{ gel coat}) \leq (\text{Emissions from } <35\% \text{ resin, } <37\% \text{ gel coat, and or other emission reduction techniques}).$

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

EF, Monomer emission factor = emission factor, expressed as % styrene emitted per weight of resin applied, which is indicated by the monomer content, method of application, and other emission reduction techniques for each gel coat and resin used.

- (e) Flow coaters, a type of non-spray application technology of a design and specifications to be approved by IDEM, OAQ, shall be used to apply neat resins. If it is not possible to apply neat resins with flow coaters, equivalent emissions reductions must be obtained via use of other techniques elsewhere in the process. Examples of other techniques include, but are not limited to, lower monomer content resins and gel coats, closed molding, vapor suppression, or installing a control device with an overall reduction efficiency of 95%.
- (d) Optimized spray techniques according to a manner approved by IDEM shall be used for gel coats and filled resins (where fillers are required for corrosion or fire retardant purposes) at all times. Optimized spray techniques include, but are not limited to, the use of airless, air-assisted airless, high volume low pressure (HVLP), or other spray applicators demonstrated to the satisfaction of IDEM, OAQ, to be equivalent to the spray applicators listed above.

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

- (e) The listed work practices shall be followed:
- (1) To the extent possible, a non-VOC, non-HAP solvent shall be used for cleanup.
  - (2) Cleanup solvent containers used to transport solvent from drums to work stations shall be closed containers having soft gasketed spring-loaded closures.

- (3) Cleanup rags saturated with solvent shall be stored, transported, and disposed of in containers that are closed tightly.
- (4) The spray guns used shall be the type that can be cleaned without the need for spraying the solvent into the air.
- (5) All solvent sprayed during cleanup or resin changes shall be directed into containers, such containers shall be closed as soon as solvent spraying is complete and the waste solvent shall be disposed of in such a manner that evaporation is minimized.
- (6) Storage containers used to store VOC- and/or HAP- containing materials shall be kept covered when not in use.

D.2.2 New Source Toxics Control [326 IAC 2-4.1-1]

Pursuant to Significant Source Modification 039-12770-00137, issued January 26, 2001, and the MACT determination under 326 IAC 2-4.1-1, operating conditions for the new booths B-7 and B-8 shall be the following:

- (a) Use of resins and gel coats shall be limited such that the potential to emit (PTE) volatile organic HAP from resins and gel coats only shall be less than 100 tons twelve (12) consecutive months. Compliance with this limit shall be determined based upon the following criteria:
  - (1) Monthly usage by weight, monomer content, method of application, and other emission reduction techniques for each gel coat and resin shall be recorded. Volatile organic HAP emissions shall be calculated by multiplying the usage of each gel coat and resin by the emission factor that is appropriate for the monomer content, method of application, and other emission reduction techniques for each gel coat and resin, and summing the emissions for all gel coats and resins. Emission factors shall be obtained from the reference approved by IDEM, OAQ.
  - (2) Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA- approved form, emission factors shall be taken from the following reference approved by IDEM, OAQ: "CFA Emission Models for the Reinforced Plastics Industries," Composites Fabricators Association, February 28, 1998 (updated as the "Unified Emission Factors for Open Molding of Composites" ("CFA Factors", April 1999)), and shall not exceed 32.3% styrene emitted per weight of gel coat applied and 17.7% styrene emitted per weight of resin applied. For the purposes of these emission calculations, monomer in resins and gel coats that is not styrene shall be considered as styrene on an equivalent weight basis.
- (b) Resins and gel coats used, including filled resins and tooling resins and gel coats, shall be limited to maximum monomer contents of 35 percent (35%) by weight for resins, 37 percent (37%) by weight for gel coats or their equivalent on an emissions mass basis. Monomer contents shall be calculated on a neat basis, i.e., excluding any filler. Compliance with these monomer content limits shall be demonstrated on a monthly basis.

The use of resins with monomer contents lower than 35%, gel coats with monomer contents lower than 37%, and/or additional emission reduction techniques approved by IDEM, OAQ, may be used to offset the use of resins with monomer contents higher than 35%, and/or gel coats with monomer contents higher than 37%. Examples of other techniques include, but are not limited to, lower monomer content resins and gel coats, closed molding, vapor suppression, vacuum bagging, controlled spraying, or installing a control device with an overall reduction efficiency of 95%. This is allowed to meet the monomer content limits for resins and gel coats, and shall be calculated on an equivalent emissions mass basis as shown below:

$(\text{Emissions from } >35\% \text{ resin or } >37\% \text{ gel coat}) - (\text{Emissions from } 35\% \text{ resin or } 37\% \text{ gel coat}) \leq (\text{Emissions from } 35\% \text{ resin or } 37\% \text{ gel coat}) - (\text{Emissions from } <35\% \text{ resin, } <37\% \text{ gel coat, and or other emission reduction techniques}).$

Where: Emissions, lb or ton = M (mass of resin or gel coat used, lb or ton) \* EF  
(Monomer emission factor for resin or gel cat used, %):

EF, Monomer emission factor = emission factor, expressed as % styrene emitted per weight of resin applied, which is indicated by the monomer content, method of application, and other emission reduction techniques for each gel coat and resin used.

- (c) Flow coaters, a type of non-spray application technology of a design and specifications to be approved by IDEM, OAQ, shall be used to apply neat resins. If it is not possible to apply neat resins with flow coaters, equivalent emissions reductions must be obtained via use of other techniques elsewhere in the process. Examples of other techniques include, but are not limited to, lower monomer content resins and gel coats, closed molding, vapor suppression, or installing a control device with an overall reduction efficiency of 95%.
- (d) Optimized spray techniques according to a manner approved by IDEM shall be used for gel coats and filled resins (where fillers are required for corrosion or fire retardant purposes) at all times. Optimized spray techniques include, but are not limited to, the use of airless, air-assisted airless, high volume low pressure (HVLP), or other spray applicators demonstrated to the satisfaction of IDEM, OAQ, to be equivalent to the spray applicators listed above.

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

- (e) The listed work practices shall be followed:
  - (1) To the extent possible, a non-VOC, non-HAP solvent shall be used for cleanup.
  - (2) Cleanup solvent containers used to transport solvent from drums to work stations shall be closed containers having soft gasketed spring-loaded closures.
  - (3) Cleanup rags saturated with solvent shall be stored, transported, and disposed of in containers that are closed tightly.
  - (4) The spray guns used shall be the type that can be cleaned without the need for spraying the solvent into the air.

- (5) All solvent sprayed during cleanup or resin changes shall be directed into containers, such containers shall be closed as soon as solvent spraying is complete and the waste solvent shall be disposed of in such a manner that evaporation is minimized.
- (6) Storage containers used to store VOC- and/or HAP- containing materials shall be kept covered when not in use.

**D.2.3 Particulate Matter (PM) [326 IAC 6-3-2]**

Pursuant to 326 IAC 6-3-2(c), particulate matter emissions shall be limited as follows:

- (a) Particulate matter as overspray from the gel coat booth B-7 and resin booth B-8 shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

or

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

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour.}$$

- (b) The allowable PM emission rate from Prep Booth 1 and Prep Booth 2 shall not exceed 1.93 pounds per hour when operating at a total process weight rate of 650 pounds per hour. The pounds per hour limitation was calculated with the following equation:

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

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

**D.2.4 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 facilities B-7 and B-8 and their control devices.

**Compliance Determination Requirements**

**D.2.5 Volatile Organic Compounds (VOC) and Volatile Organic Hazardous Air Pollutants (HAP)**

Compliance with the VOC and volatile organic HAP content and usage limitations respectively contained in Conditions D.2.1 and D.2.2 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.

**D.2.6 VOC and HAP Emissions**

Compliance with Conditions D.2.1 and D.2.2 for VOC and volatile organic HAP, respectively, shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound and volatile organic HAP usages for the most recent twelve (12) month period.

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

### **D.2.7 Particulate Matter (PM)**

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In order to comply with D.2.3, the dry filters for PM control shall be in operation at all times when the gel and resin application booths B-7 and B-8 are in operation.

### **D.2.8 Monitoring**

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- (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 B-7 and B-8 facility stacks SV-7 and SV-8 while 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 stacks 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.2.9 Record Keeping Requirements**

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- (a) To document compliance with Conditions D.2.1 and D.2.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the volatile organic compounds (VOC) and volatile organic HAP emission limits established.
  - (1) The usage by weight and monomer content of resin and gel coat used, and the usage by weight and VOC and volatile organic HAP 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 added to coatings and those used as cleanup solvents;
  - (2) A log of the dates of use;
  - (3) Method of application and other emission reduction techniques for each resin and gel coat used;
  - (4) The calculated total volatile organic HAP emitted from resin and gel coat usage for each month and for the compliance period; and
  - (5) The calculated total volatile organic compounds (VOC) emitted from all coatings, including resin and gel coat usage, for each month and for the compliance period.

- (b) To document compliance with Condition D.2.8, 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.2.10 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.2.1 and D.2.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

### SECTION D.3

### FACILITY OPERATION CONDITIONS

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

##### Plant #2:

- (a) One (1) paint booth constructed July 16, 1998, coating a maximum of 195 fiberglass truck caps per day, equipped with a high volume low pressure (HVLP) spray application system consisting of one (1) basecoat gun and one (1) clear coat gun and dry filter for particulate matter overspray control, and exhausting at two (2) stacks identified as SV-14 and SV-15.
- (b) One (1) mold repair area consisting of three (3) fiberglass mold production booths, constructed July 16, 1998, producing a maximum of 12 molds per week, equipped with a total of two (2) high volume low pressure (HVLP) spray guns and one (1) flow coater chop gun, with dry filter for particulate matter overspray control, and exhausting at three (3) stacks SV-16 through SV-18.
- (c) One (1) production area constructed July 16, 1998, producing a maximum of 195 fiberglass truck caps per day and consisting of:
  - (1) One (1) chop booth equipped with one (1) flow coater chop gun exhausting at two (2) stacks identified as SV-1 and SV-2, and
  - (2) One (1) gel coat application booth equipped with a high volume low pressure (HVLP) spray application system consisting of three (3) spray guns for color changes, using only one (1) gun at a time, with dry filter for particulate matter overspray control, and exhausting at one (1) stack identified as SV-3.
- (d) One Plant #2 Grind Booth for miscellaneous cutting and sanding operations for fiberglass and wood, constructed July 16, 1998, processing 730 pounds of product per hour, consisting of twelve (12) DA sanders, six (6) buffers, three (3) hand cutters, two (2) band saws, and two (2) table saws, exhausting at one (1) stack identified as SV-7.

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

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

##### D.3.1 NESHAPs [326 IAC 20] [40 CFR Part 63]

Currently there are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 20 and 40 CFR Part 63) applicable to this source. However, the United States Environmental Protection Agency (US EPA) has established the *Reinforced Plastic Composites Production* and the *Plastic Parts and Products (Surface Coating)* source categories as those requiring hazardous air pollutant control and has tentatively established August 2001 and December 2001 as the final rule promulgation dates, respectively. The source shall evaluate applicability to each rule upon its promulgation and shall comply with the applicable rules.

##### D.3.2 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

Pursuant to CP-039-9337-00137, issued on July 15, 1998, the paint booth, mold repair area consisting of three (3) fiberglass mold production booths, and production area consisting of (1) chop booth and one (1) gel coat booth, are subject to the requirements of 326 IAC 8-1-6 ((New Facilities: General Reduction Requirements), which requires that the Best Available Control Technology (BACT) be used to control VOC emissions as follows:

- (a) The total potential to emit (PTE) VOC from these facilities shall be less than 95.3 tons per twelve (12) consecutive month period. For the purpose of determining compliance with this limit, each ton of volatile organic hazardous air pollutant (HAP) emitted from resins and gel coats applied, as determined by the criteria set forth in D.3.2(a)(1) and (2), shall be considered a ton of VOC emitted.

- (b) This limit on the potential to emit (PTE) VOC is required as a component of the BACT determination and, in addition to the requirements of 326 IAC 2-4.1-1 (New Source Toxics Control) specified in Condition D.3.2, shall satisfy the BACT requirements for these facilities.

D.3.3 New Source Toxics Control [326 IAC 2-4.1-1]

Pursuant to CP-039-9337-00137, issued on July 15, 1998, the MACT determination under 326 IAC 2-4.1-1 for the paint booth, mold repair area consisting of three (3) fiberglass mold production booths, and production area consisting of (1) chop booth and one (1) gel coat booth, shall be the following:

- (a) Use of resins and gel coats shall be limited such that the total potential to emit (PTE) volatile organic hazardous air pollutant (HAP) from resins and gel coats only shall be less than 95.3 tons per twelve (12) consecutive month period. Compliance with this limit shall be determined based upon the following criteria:
- (1) Monthly usage by weight, monomer content, method of application, and other emission reduction techniques for each gel coat and resin shall be recorded. Volatile organic HAP emissions shall be calculated by multiplying the usage of each gel coat and resin by the emission factor that is appropriate for the monomer content, method of application, and other emission reduction techniques for each gel coat and resin, and summing the emissions for all gel coats and resins. Emission factors shall be obtained from the reference approved by IDEM, OAQ.
  - (2) Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA-approved form, emission factors shall be taken from the following reference approved by IDEM, OAQ: "CFA Emission Models for the Reinforced Plastics Industries", Composites Fabricators Association, February 28, 1998, and shall not exceed 32.3% styrene emitted per weight of gel coat applied and 17.7% styrene emitted per weight of resin applied. For the purposes of these emission calculations, monomer in resins and gel coats that is not styrene shall be considered as styrene on an equivalent weight basis.
- (b) Resins and gel coats used, including filled resins and tooling resins and gel coats, shall be limited to a maximum of 35 percent (35%) by weight for resins, 37 percent (37%) by weight for gel coats or their equivalent on an emissions mass basis. Monomer contents shall be calculated on a neat basis, i.e., excluding any filler. Compliance with these monomer content limits shall be demonstrated on a monthly basis.

The use of resins with monomer contents lower than 35%, gel coats with monomer contents lower than 37%, and/or additional emission reduction techniques approved by IDEM, OAQ, may be used to offset the use of resins with monomer contents higher than 35%, and/or gel coats with monomer contents higher than 37%. This is allowed to meet the monomer content limits for resins and gel coats, and shall be calculated on an equivalent emissions mass basis as shown below:

$(\text{Emissions from } >35\% \text{ resin or } >37\% \text{ gel coat}) - (\text{Emissions from } 35\% \text{ resin or } 37\% \text{ gel coat}) \# (\text{Emissions from } 35\% \text{ resin or } 37\% \text{ gel coat}) - (\text{Emissions from } <35\% \text{ resin, } <37\% \text{ gel coat, and/or other emission reduction techniques}).$

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

EF, Monomer emission factor = emission factor, expressed as % styrene emitted per weight of resin applied, which is indicated by the monomer content, method of application, and other emission reduction techniques for each gel coat and resin used.

- (c) Flow coaters, a type of non-spray application technology of a design and specifications to be approved by IDEM, OAQ, shall be used to apply 100% of all neat resins used. If it is not possible to apply neat resins with flow coaters, equivalent emissions reductions must be obtained via use of other techniques elsewhere in the process. Examples of other techniques include, but are not limited to, lower monomer content resins and gel coats, closed molding, vapor suppression, or installing a control device with an overall reduction efficiency of 95%.
- (d) Optimized spray techniques according to a manner approved by IDEM shall be used for coatings, gel coats and filled resins (where fillers are required for corrosion or fire retardant purposes) at all times. Optimized spray techniques include, but are not limited to, the use of airless, air-assisted airless, high volume low pressure (HVLP), or other spray applicators demonstrated to the satisfaction of IDEM, OAQ, to be equivalent to the spray applicators listed above.

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

- (e) The listed work practices shall be followed:
  - (1) To the extent possible, a non-VOC, non-HAP solvent shall be used for cleanup.
  - (2) Cleanup solvent containers shall be used to transport solvent from drums to work.
  - (3) Clean up stations shall be closed containers having soft gasketed spring-loaded closures and shall be kept completely closed when not in use.
  - (4) Cleanup rags saturated with solvent shall be stored, transported, and disposed of in containers that are closed tightly.
  - (5) The spray guns used shall be the type that can be cleaned without the need for spraying the solvent into the air.
  - (6) All solvent sprayed during cleanup or resin changes shall be directed into containers. Such containers shall be closed as soon as solvent spraying is complete and the waste solvent shall be disposed of in such a manner that evaporation is minimized.
  - (7) Storage containers used to store VOC- and/or HAP- containing materials shall be kept covered when not in use.

**D.3.4 Particulate Matter (PM) [326 IAC 6-3-2]**

Pursuant to 326 IAC 6-3-2(c), particulate matter emissions shall be limited as follows:

- (a) Particulate matter as overspray from the paint booth, three (3) fiberglass mold production booths, and the production area chop booth and gel coat application booth, each shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

or

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

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour.}$$

- (b) The allowable PM emission rate from miscellaneous cutting and sanding operations at the Plant #2 Grind Booth shall not exceed 2.08 pounds per hour when operating at a process weight rate of 730 pounds per hour. The pounds per hour limitation was calculated with the following equation:

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

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

**D.3.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]**

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

**Compliance Determination Requirements**

**D.3.6 Volatile Organic Compounds (VOC)**

Compliance with the VOC content and usage limitations contained in Conditions D.3.2 and D.3.3 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.

**D.3.7 VOC and HAP Emissions**

Compliance with Conditions D.3.2 and D.3.3 for VOC and volatile organic HAP, respectively, shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound and volatile organic HAP usages for the most recent twelve (12) month period.

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

**D.3.8 Particulate Matter (PM)**

Pursuant to CP-039-9337-00137, issued on July 15, 1998, and in order to comply with Condition D.3.4, the dry filters for PM control shall be in operation and control emissions from the paint booth, three (3) fiberglass mold production booths, and production area gel coat application booth at all times when the facilities are in operation.

#### D.3.9 Monitoring

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- (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 paint booth stacks SV-14 and SV-15; mold production booth stacks SV-16, SV-17 and SV-18; and production area gel coat booth stack SV-3, while 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 stacks 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.3.10 Record Keeping Requirements

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- (a) To document compliance with Conditions D.3.2 and D.3.3, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the volatile organic compounds (VOC) and volatile organic HAP emission limits established.
  - (1) The usage by weight and monomer content of resin and gel coat used, and the usage by weight 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 added to coatings and those used as cleanup solvents;
  - (2) A log of the dates of use;
  - (3) Method of application and other emission reduction techniques for each resin and gel coat used;
  - (4) The calculated total volatile organic HAP emitted from resin and gel coat usage for each month and for the compliance period; and
  - (5) The calculated total volatile organic compounds (VOC) emitted from all coatings, including resin and gel coat usage, for each month and for the compliance period.
- (b) To document compliance with Condition D.3.9, 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.3.11 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.3.2 and D.3.3 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

## SECTION D.4

## FACILITY OPERATION CONDITIONS

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

The following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6, including two (2) Safety-Kleen wash tanks each at a capacity of 660 gallons and containing pure grade lacquer thinner. [326 IAC 8-3-2] [326 IAC 8-3-5]
- (b) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment and welding equipment. [326 IAC 6-3-2]

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

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

#### **Process Weight Activities**

##### **D.4.1 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. This includes the following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment and welding equipment.

#### **Degreasing Operations**

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

##### **D.4.2 Volatile Organic Compounds (VOC)**

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations) for cold cleaning operations constructed after January 1, 1980, the owner or operator shall ensure that the following requirements are met for each of the two (2) 660 gallon Safety-Kleen wash tanks:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

#### D.4.3 Volatile Organic Compounds (VOC)

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- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility construction of which commenced after July 1, 1990, shall ensure that the following control equipment requirements are met for each of the two (2) 660 gallon Safety-Kleen wash tanks:
- (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
    - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
    - (B) The solvent is agitated; or
    - (C) The solvent is heated.
  - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
  - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
  - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
  - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
    - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
    - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
    - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility construction of which commenced after July 1, 1990, shall ensure that the following operating requirements are met for each of the two (2) 660 gallon Safety-Kleen wash tanks:
- (1) Close the cover whenever articles are not being handled in the degreaser.

- (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
- (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

**Compliance Determination Requirements**

There are no applicable compliance determination requirements for these facilities.

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

There are no applicable compliance monitoring requirements for these facilities.

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

There are no specific record keeping or reporting requirements for these facilities.

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

**PART 70 OPERATING PERMIT  
CERTIFICATION**

Source Name: Covermaster, Inc.  
Source Address: 57784 C.R. 3, Elkhart, Indiana 46517  
Mailing Address: 57784 C.R. 3, Elkhart, Indiana 46517  
Part 70 Permit No.: T039-7354-00137

**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 Affidavit (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 QUALITY  
COMPLIANCE BRANCH  
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 OCCURRENCE REPORT**

Source Name: Covermaster, Inc.  
Source Address: 57784 C.R. 3, Elkhart, Indiana 46517  
Mailing Address: 57784 C.R. 3, Elkhart, Indiana 46517  
Part 70 Permit No.: T039-7354-00137

**This form consists of 2 pages**

**Page 1 of 2**

<p><b>9</b> This is an emergency as defined in 326 IAC 2-7-1(12)</p> <ul style="list-style-type: none"><li><b>c</b> The Permittee must notify the Office of Air Quality (OAQ), within four <b>(4)</b> business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and</li><li><b>c</b> The Permittee must submit notice in writing or by facsimile within two <b>(2)</b> days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16.</li></ul>
---

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

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

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

Page 2 of 2

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

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

A certification is not required for this report.

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

### Part 70 Quarterly Report

Source Name: Covermaster, Inc.  
 Source Address: 57784 C.R. 3, Elkhart, Indiana 46517  
 Mailing Address: 57784 C.R. 3, Elkhart, Indiana 46517  
 Part 70 Permit No.: T039-7354-00137  
 Facility: Plant #1 chop coat booth B-1; gel coat booth B-2; mold construction booth B-5; and spray paint booth B-6  
 Parameter: volatile organic compounds (VOC)  
 Limit: total VOC input, including VOC solvent usage, minus VOC solvent shipped out, shall be limited such that the potential to emit VOC is limited to 138.0 tons per twelve (12) consecutive month period. Compliance with this condition shall be based on the following:

- (a) When applying gel coats and resins, VOC emissions shall be calculated by multiplying the material usage by the appropriate emission factor based on the monomer content, method of application, and other emission reduction techniques, and summing the emissions for all gel coats and resins.
- (b) Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA- approved form, emission factors for the gel coat and resin applications shall be taken from the following reference approved by IDEM, OAQ: "CFA Emission Models for the Reinforced Plastics Industries," Composites Fabricators Association, February 28, 1998 (updated as the "Unified Emission Factors for Open Molding of Composites" ("CFA Factors", April 1999). For the purposes of these emission calculations, monomer in resins and gel coats that is not styrene shall be considered as styrene on an equivalent weight basis.
- (c) When applying coatings and VOC solvents other than gel coats and resins, VOC emissions shall be calculated using an emission factor of 2,000 pounds of VOC emitted per ton of VOC used.

YEAR: \_\_\_\_\_

Month	Total VOC Emitted (tons)	Total VOC Emitted (tons)	Total VOC Emitted (tons)
	This Month	Previous 11 Months	12 Month Total
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: \_\_\_\_\_

Attach a signed certification to complete this report.

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

### Part 70 Quarterly Report

Source Name: Covermaster, Inc.  
 Source Address: 57784 C.R. 3, Elkhart, Indiana 46517  
 Mailing Address: 57784 C.R. 3, Elkhart, Indiana 46517  
 Part 70 Permit No: T039-7354-00137  
 Facility: gel coat booth B-7 & chop coat booth B-8, Plant #1  
 Parameter: volatile organic compounds (VOC) and volatile organic hazardous air pollutants (HAPs)  
 Limit: (a) Use of resins, gel coats and clean-up solvents, as well as VOC delivered to the applicators, shall be limited such that the potential to emit (PTE) VOC from resin and gel coat applications shall be limited to less than 100 tons per twelve (12) consecutive month period.  
 (b) Use of resins and gel coats shall be limited such that the total potential to emit (PTE) volatile organic hazardous air pollutant (HAP) from resins and gel coats only shall be less than 100 tons per twelve (12) consecutive month period. Compliance with this limit shall be determined based upon the following criteria:  
 (1) When applying gel coats and resins, VOC emissions shall be calculated by multiplying the material usage by the appropriate emission factor based on the monomer content, method of application, and other emission reduction techniques, and summing the emissions for all gel coats and resins.  
 (2) Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA- approved form, emission factors for the gel coat and resin applications shall be taken from the following reference approved by IDEM, OAQ: "CFA Emission Models for the Reinforced Plastics Industries," Composites Fabricators Association, February 28, 1998 (updated as the "Unified Emission Factors for Open Molding of Composites" ("CFA Factors", April 1999). For the purposes of these emission calculations, monomer in resins and gel coats that is not styrene shall be considered as styrene on an equivalent weight basis.  
 (3) When applying coatings and VOC solvents other than gel coats and resins, VOC emissions shall be calculated using an emission factor of 2,000 pounds of VOC emitted per ton of VOC used.

YEAR: \_\_\_\_\_

Month	Emitted This Month (tons)		Emitted Previous 11 Months (tons)		Total Emitted 12 Months (tons)	
	VOC	volatile organic HAPs	VOC	volatile organic HAPs	VOC	volatile organic HAPs
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: \_\_\_\_\_

Attach a signed certification to complete this report.

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

### Part 70 Quarterly Report

Source Name: Covermaster, Inc.  
 Source Address: 57784 C.R. 3, Elkhart, Indiana 46517  
 Mailing Address: 57784 C.R. 3, Elkhart, Indiana 46517  
 Part 70 Permit No: T039-7354-00137  
 Facility: Plant #2 paint booth; mold repair area consisting of three (3) fiberglass mold production booths; and production area consisting of (1) chop booth and one (1) gel coat booth  
 Parameter: volatile organic compounds (VOC) and volatile organic hazardous air pollutants (HAPs)  
 Limit: (a) total VOC usage shall be limited such that the potential to emit (PTE) VOC from these facilities is less than 95.3 tons per twelve (12) consecutive month period. For the purpose of determining compliance with this limit, each ton of volatile organic hazardous air pollutant (HAP) emitted from resins and gel coats applied, as determined by the criteria set forth below, shall be considered a ton of VOC emitted.  
 (b) Use of resins and gel coats shall be limited such that the total potential to emit (PTE) volatile organic hazardous air pollutant (HAP) from resins and gel coats only shall be less than 95.3 tons per twelve (12) consecutive month period. Compliance with this limit shall be determined based upon the following criteria:  
 (1) Volatile organic HAP emissions shall be calculated by multiplying the usage of each gel coat and resin by the emission factor that is appropriate for the monomer content, method of application, and other emission reduction techniques for each gel coat and resin, and summing the emissions for all gel coats and resins. Emission factors shall be obtained from the reference approved by IDEM, OAQ.  
 (2) Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA-approved form, emission factors shall be taken from the following reference approved by IDEM, OAQ: "CFA Emission Models for the Reinforced Plastics Industries", Composites Fabricators Association, February 28, 1998, and shall not exceed 32.3% styrene emitted per weight of gel coat applied and 17.7% styrene emitted per weight of resin applied. For the purposes of these emission calculations, monomer in resins and gel coats that is not styrene shall be considered as styrene on an equivalent weight basis.

YEAR: \_\_\_\_\_

Month	Emitted This Month (tons)		Emitted Previous 11 Months (tons)		Total Emitted 12 Months (tons)	
	VOC	volatile organic HAPs	VOC	volatile organic HAPs	VOC	volatile organic HAPs
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: \_\_\_\_\_

Attach a signed certification to complete this report.

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

**PART 70 OPERATING PERMIT  
 QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Covermaster, Inc.  
 Source Address: 57784 C.R. 3, Elkhart, Indiana 46517  
 Mailing Address: 57784 C.R. 3, Elkhart, Indiana 46517  
 Part 70 Permit No.: T039-7354-00137

**Months:** \_\_\_\_\_ **to** \_\_\_\_\_ **Year:** \_\_\_\_\_

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

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

Form Completed By: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

## Indiana Department of Environmental Management Office of Air Quality

### Addendum to the Technical Support Document (TSD) for a Part 70 Operating Permit

Source Name:	Covermaster, Inc.
Source Location:	57784 C.R. 3, Elkhart, Indiana 46517
County:	Elkhart
SIC Code:	3799
Operation Permit No.:	T039-7354-00137
Permit Reviewer:	Michael Hirtler / EVP

On December 20, 2000, the Office of Air Quality (OAQ) had a notice published in the Elkhart Truth, Elkhart, Indiana, stating that Covermaster, Inc. had applied for a Part 70 operating permit for their fiberglass truck cap and component manufacturing source. The notice also stated that OAQ proposed to issue a Part 70 Operating Permit for this source 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 Part 70 Operating Permit should be issued as proposed.

On October 5, 2000, Covermaster, Inc. submitted an application to the OAQ requesting a source modification for the installation and operation of one (1) gel coat booth, one (1) resin application booth, two (2) product preparation booths and one (1) water cutting machine at the existing fiberglass products manufacturing plant. On January 26, 2001, OAQ issued approval of this significant source modification as SSM 039-12770-00137. As a result, Sections A and D of Part 70 permit T039-7354-00137 are revised to include the equipment and conditions of SSM 039-12770-00137. This is consistent with Condition B.4 of the source modification approval. Additionally, the draft permit has been modified in its entirety to revise the name of the permitting authority from the previously identified Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM), to the current Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). Such changes have been made without replication below. The changes to the draft permit are presented below, with new language in bold and deleted language with a line through it. Due to the number of changes made, the revised Part 70 Operating Permit Table of Contents should be consulted for the new page numbers to the revised conditions described below.

#### **SECTION A:**

1. Condition A.1 (General Information) is revised to clarify that the source status is major for the PSD rules. New equipment has been approved for construction and operation under Significant Source Modification 039-12770-00137, issued on January 26, 2001. The approved source modification has increased the source-wide limited PTE VOC to greater than 250 tons per year. Therefore, the source status in Section A.1 has been revised to PSD major and, since the source is not located in an area designated in 326 IAC 1-4 as nonattainment, the Emission Offset rule cited at 326 IAC 2-3 is not applicable and is removed.

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

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The Permittee owns and operates a stationary fiberglass truck cap and component manufacturing source.

Responsible Official: Dillard Fletcher, President  
Source Address: 57784 C.R. 3, Elkhart, Indiana 46517  
Mailing Address: 57784 C.R. 3, Elkhart, Indiana 46517  
SIC Code: 3799  
County Location: Elkhart  
Source Location Status: Attainment for all criteria pollutants  
Attainment for all other criteria pollutants  
Part 70 Permit Program  
Source Status: Part 70 Permit Program  
~~Minor~~ **Major** Source, under PSD or Emission Offset Rules;  
Major Source, Section 112 of the Clean Air Act

2. Condition A.2 has been revised to include the equipment approved in Significant Source Modification 039-12770-00137, issued January 26, 2001. The facility listed as a water jet cutting machine in the source modification is not expected to have pollutant emissions that qualify this facility as significant or insignificant and therefore it is not listed in respective Conditions A.2 or A.3 of the Part 70 permit.

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

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This stationary source consists of the following emission units and pollution control devices, which are separated listed under two (2) groups identified by the source as Plant #1 and Plant #2, corresponding to onsite production Buildings #1 and #2, respectively:

Plant #1:

- (a) One (1) resin chop coat booth identified as B-1, constructed October 11, 1995, producing a maximum of 8.125 fiberglass units per hour, equipped with a high volume low pressure (HVLP) spray application system consisting of one (1) airless chop gun and dry filter for particulate matter overspray control, and exhausting at one (1) stack identified as SV-1.
- (b) One (1) gel coat application booth identified as B-2, constructed October 11, 1995, producing a maximum of 8.125 fiberglass units per hour, equipped with a high volume low pressure (HVLP) spray application system consisting of three (3) spray guns for color changes, using only one (1) gun at a time, and dry filter for particulate matter overspray control, and exhausting at one (1) stack identified as SV-2.
- (c) One (1) cut and grind booth identified as B-4, constructed October 11, 1995, processing 656 pounds of fiberglass product per hour, equipped with four (4) Torit dust collectors for particulate matter control respectively identified as GRDC-1, GRDC-2, GRDC-3 and GRDC-4, each exhausting inside the building.
- (d) One (1) mold construction and rail assembly booth identified as B-5, constructed October 20, 1995, producing a maximum of 8.125 fiberglass units per hour and 1 mold per month, equipped with one (1) airless resin chop gun and dry filter for particulate matter overspray control, and exhausting at one (1) stack identified as SV-5.

- (e) One (1) spray paint booth identified as B-6, constructed October 20, 1995, coating a maximum of 8.125 fiberglass units per hour, equipped with a high volume low pressure (HVLP) spray application system consisting of two (2) spray guns and dry filter for particulate matter overspray control, and exhausting at four (4) stacks collectively identified as SV-6.
- (f) **One (1) gel coat application booth identified as B-7, producing a maximum of 10 fiberglass truck caps and parts per hour, equipped with a high volume low pressure (HVLP) spray application system consisting of three (3) spray guns for color changes, using only one (1) gun at a time, and dry filter for particulate matter overspray control, and exhausting at one (1) stack identified as SV-7.**
- (g) **One (1) resin chop coat booth identified as B-8, producing a maximum of 10 fiberglass truck caps and parts per hour, equipped with one (1) flow coater chop gun and dry filter for particulate matter overspray control, and exhausting at one (1) stack identified as SV-8.**
- (h) **Two (2) product preparation booths, identified as Prep Booth B-1 and Prep Booth B-2, containing grinders, cutters and buffers and processing up to a total of 650 pounds of fiberglass product per hour, each equipped with a filter bank system for particulate matter control and exhausting inside the building.**

Plant #2:

- (a) One (1) paint booth constructed July 16, 1998, coating a maximum of 195 fiberglass truck caps per day, equipped with a high volume low pressure (HVLP) spray application system consisting of one (1) basecoat gun and one (1) clear coat gun and dry filter for particulate matter overspray control, and exhausting at two (2) stacks identified as SV-14 and SV-15.
- (b) One (1) mold repair area consisting of three (3) fiberglass mold production booths, constructed July 16, 1998, producing a maximum of 12 molds per week, equipped with a total of two (2) high volume low pressure (HVLP) spray guns and one (1) flow coater chop gun, with dry filter for particulate matter overspray control, and exhausting at three (3) stacks SV-16 through SV-18.
- (c) One (1) production area constructed July 16, 1998, producing a maximum of 195 fiberglass truck caps per day and consisting of:
  - (1) One (1) chop booth equipped with one (1) flow coater chop gun exhausting at two (2) stacks identified as SV-1 and SV-2, and
  - (2) One (1) gel coat application booth equipped with a high volume low pressure (HVLP) spray application system consisting of three (3) spray guns for color changes, using only one (1) gun at a time, with dry filter for particulate matter overspray control, and exhausting at one (1) stack identified as SV-3.
- (d) One Plant #2 Grind Booth for miscellaneous cutting and sanding operations for fiberglass and wood, constructed July 16, 1998, processing 730 pounds of product per hour, consisting of twelve (12) DA sanders, six (6) buffers, three (3) hand cutters, two (2) band saws, and two (2) table saws, exhausting at one (1) stack identified as SV-7.

## SECTION B

1. Condition B.12 (Emergency Provisions), paragraph (b)(4), has been revised to include the IDEM - Northern Regional Office as an additional office to be contacted in the case of an emergency, as defined in the condition. Identification of the regional office was inadvertently omitted from the draft permit.

### B.12 Emergency Provisions [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:

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

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

Telephone Number: 317-233-5674 (ask for Compliance Section)

Facsimile Number: 317-233-5967

**Telephone No.: 1-800-753-5519 (IDEM Northern Regional Office)**

**Facsimile No.: 219-245-4877 (IDEM Northern Regional Office)**

## SECTION D

1. Condition D.1.3 (PSD Minor Source Status) is revised to clarify that the VOC limit applies to the facilities listed in Sections D.1 and D.2 (now re-numbered to D.3). This clarification is necessary since new equipment has been approved for construction and operation under Significant Source Modification 039-12770-00137, issued on January 26, 2001. The new facilities, which must comply with the conditions of new Section D.2 (see following item 2, below), are not included under draft Condition D.1.3 and the revised condition clarifies this fact.

### D.1.3 PSD Minor ~~Source~~ Status [326 IAC 2-2] [40 CFR 52.21]

Compliance with Conditions D.1.2 and D.23.2 shall limit the potential emissions of volatile organic compounds (VOC) of the ~~source~~ **facilities listed at Sections D.1 and D.3** to less than 250 tons per twelve (12) consecutive month period. Therefore the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply. Any change or modification **to the facilities listed at Sections D.1 and D.3** which may increase VOC usage to 250 tons per twelve (12) consecutive month, or greater, shall require OAQ's prior approval before such change can take place.

2. Draft Sections D.2 and D.3 have been re-numbered to Sections D.3 and D.4, respectively, and a new Section D.2 is inserted. New Section D.2 contains the conditions from Section D.1 of Significant Source Modification 039-12770-00137, issued January 26, 2001. The related quarterly reporting form is also inserted into the Part 70 permit, as shown at the end of this document.

## SECTION D.2 FACILITY OPERATION CONDITIONS

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

#### Plant #1

- (f) One (1) gel coat application booth identified as B-7, producing a maximum of 10 fiberglass truck caps and parts per hour, equipped with a high volume low pressure (HVLV) spray application system consisting of three (3) spray guns for color changes, using only one (1) gun at a time, and dry filter for particulate matter overspray control, and exhausting at one (1) stack identified as SV-7.
- (g) One (1) resin chop coat booth identified as B-8, producing a maximum of 10 fiberglass truck caps and parts per hour, equipped with one (1) flow coater chop gun and dry filter for particulate matter overspray control, and exhausting at one (1) stack identified as SV-8.
- (h) Two (2) product preparation booths, identified as Prep Booth B-1 and Prep Booth B-2, containing grinders, cutters and buffers and processing up to a total of 650 pounds of fiberglass product per hour, each equipped with a filter bank system for particulate matter control and exhausting inside the building.

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

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

#### D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

Pursuant to the BACT determination under 326 IAC 8-1-6, operating conditions for booths B-7 and B-8 shall be the following:

- (a) Use of resins, gel coats and clean-up solvents, as well as VOC delivered to the applicators, shall be limited such that the potential to emit (PTE) VOC from resin and gel coat applications shall be limited to less than 100 tons per twelve (12) consecutive month period. Compliance with this limit shall be determined based upon the following criteria:
  - (1) Monthly usage by weight, monomer content, method of application, and other emission reduction techniques for each gel coat and resin shall be recorded. VOC emissions shall be calculated by multiplying the usage of each gel coat and resin by the emission factor that is appropriate for the monomer content, method of application, and other emission reduction techniques for each gel coat and resin, and summing the emissions for all gel coats and resins. Emission factors shall be obtained from the reference approved by IDEM, OAQ.

- (2) Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA- approved form, emission factors shall be taken from the following reference approved by IDEM, OAQ: "CFA Emission Models for the Reinforced Plastics Industries," Composites Fabricators Association, February 28, 1998, or its update, and shall not exceed 32.3% styrene emitted per weight of gel coat applied and 17.7% styrene emitted per weight of resin applied. For the purposes of these emission calculations, monomer in resins and gel coats that is not styrene shall be considered as styrene on an equivalent weight basis.
- (3) When applying coatings and VOC solvents other than gel coats and resins, VOC emissions shall be calculated using an emission factor of 2,000 pounds of VOC emitted per ton of VOC used.
- (b) Resins and gel coats used, including filled resins and tooling resins and gel coats, shall be limited to maximum monomer contents of 35 percent (35%) by weight for resins, 37 percent (37%) by weight for gel coats or their equivalent on an emissions mass basis. Monomer contents shall be calculated on a neat basis, i.e., excluding any filler. Compliance with these monomer content limits shall be demonstrated on a monthly basis.

The use of resins with monomer contents lower than 35%, gel coats with monomer contents lower than 37%, and/or additional emission reduction techniques approved by IDEM, OAQ, may be used to offset the use of resins with monomer contents higher than 35%, and/or gel coats with monomer contents higher than 37%. Examples of other techniques include, but are not limited to, lower monomer content resins and gel coats, closed molding, vapor suppression, vacuum bagging, controlled spraying, or installing a control device with an overall reduction efficiency of 95%. This is allowed to meet the monomer content limits for resins and gel coats, and shall be calculated on an equivalent emissions mass basis as shown below:

$(\text{Emissions from } >35\% \text{ resin or } >37\% \text{ gel coat}) - (\text{Emissions from } 35\% \text{ resin or } 37\% \text{ gel coat}) \leq (\text{Emissions from } 35\% \text{ resin or } 37\% \text{ gel coat}) - (\text{Emissions from } <35\% \text{ resin, } <37\% \text{ gel coat, and or other emission reduction techniques}).$

Where: Emissions, lb or ton = M (mass of resin or gel coat used, lb or ton) \* EF (Monomer emission factor for resin or gel cat used, %):

EF, Monomer emission factor = emission factor, expressed as % styrene emitted per weight of resin applied, which is indicated by the monomer content, method of application, and other emission reduction techniques for each gel coat and resin used.

- (c) **Flow coaters, a type of non-spray application technology of a design and specifications to be approved by IDEM, OAQ, shall be used to apply neat resins. If it is not possible to apply neat resins with flow coaters, equivalent emissions reductions must be obtained via use of other techniques elsewhere in the process. Examples of other techniques include, but are not limited to, lower monomer content resins and gel coats, closed molding, vapor suppression, or installing a control device with an overall reduction efficiency of 95%.**
- (d) **Optimized spray techniques according to a manner approved by IDEM shall be used for gel coats and filled resins (where fillers are required for corrosion or fire retardant purposes) at all times. Optimized spray techniques include, but are not limited to, the use of airless, air-assisted airless, high volume low pressure (HVLP), or other spray applicators demonstrated to the satisfaction of IDEM, OAQ, to be equivalent to the spray applicators listed above.**

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

- (e) **The listed work practices shall be followed:**
- (1) **To the extent possible, a non-VOC, non-HAP solvent shall be used for cleanup.**
  - (2) **Cleanup solvent containers used to transport solvent from drums to work stations shall be closed containers having soft gasketed spring-loaded closures.**
  - (3) **Cleanup rags saturated with solvent shall be stored, transported, and disposed of in containers that are closed tightly.**
  - (4) **The spray guns used shall be the type that can be cleaned without the need for spraying the solvent into the air.**
  - (5) **All solvent sprayed during cleanup or resin changes shall be directed into containers, such containers shall be closed as soon as solvent spraying is complete and the waste solvent shall be disposed of in such a manner that evaporation is minimized.**
  - (6) **Storage containers used to store VOC- and/or HAP- containing materials shall be kept covered when not in use.**

**D.2.2 New Source Toxics Control [326 IAC 2-4.1-1]**

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Pursuant to the MACT determination under 326 IAC 2-4.1-1, operating conditions for the new booths B-7 and B-8 shall be the following:

- (a) Use of resins and gel coats shall be limited such that the potential to emit (PTE) volatile organic HAP from resins and gel coats only shall be less than 100 tons twelve (12) consecutive months. Compliance with this limit shall be determined based upon the following criteria:
- (1) Monthly usage by weight, monomer content, method of application, and other emission reduction techniques for each gel coat and resin shall be recorded. Volatile organic HAP emissions shall be calculated by multiplying the usage of each gel coat and resin by the emission factor that is appropriate for the monomer content, method of application, and other emission reduction techniques for each gel coat and resin, and summing the emissions for all gel coats and resins. Emission factors shall be obtained from the reference approved by IDEM, OAQ.
  - (2) Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA- approved form, emission factors shall be taken from the following reference approved by IDEM, OAQ: "CFA Emission Models for the Reinforced Plastics Industries," Composites Fabricators Association, February 28, 1998 (updated as the "Unified Emission Factors for Open Molding of Composites" ("CFA Factors", April 1999)), and shall not exceed 32.3% styrene emitted per weight of gel coat applied and 17.7% styrene emitted per weight of resin applied. For the purposes of these emission calculations, monomer in resins and gel coats that is not styrene shall be considered as styrene on an equivalent weight basis.
- (b) Resins and gel coats used, including filled resins and tooling resins and gel coats, shall be limited to maximum monomer contents of 35 percent (35%) by weight for resins, 37 percent (37%) by weight for gel coats or their equivalent on an emissions mass basis. Monomer contents shall be calculated on a neat basis, i.e., excluding any filler. Compliance with these monomer content limits shall be demonstrated on a monthly basis.

The use of resins with monomer contents lower than 35%, gel coats with monomer contents lower than 37%, and/or additional emission reduction techniques approved by IDEM, OAQ, may be used to offset the use of resins with monomer contents higher than 35%, and/or gel coats with monomer contents higher than 37%. Examples of other techniques include, but are not limited to, lower monomer content resins and gel coats, closed molding, vapor suppression, vacuum bagging, controlled spraying, or installing a control device with an overall reduction efficiency of 95%. This is allowed to meet the monomer content limits for resins and gel coats, and shall be calculated on an equivalent emissions mass basis as shown below:

**(Emissions from >35% resin or >37% gel coat) - (Emissions from 35% resin or 37% gel coat) ≤ (Emissions from 35% resin or 37% gel coat) - (Emissions from <35% resin, <37% gel coat, and or other emission reduction techniques).**

**Where: Emissions, lb or ton = M (mass of resin or gel coat used, lb or ton) \* EF (Monomer emission factor for resin or gel cat used, %):**

**EF, Monomer emission factor = emission factor, expressed as % styrene emitted per weight of resin applied, which is indicated by the monomer content, method of application, and other emission reduction techniques for each gel coat and resin used.**

- (c) Flow coaters, a type of non-spray application technology of a design and specifications to be approved by IDEM, OAQ, shall be used to apply neat resins. If it is not possible to apply neat resins with flow coaters, equivalent emissions reductions must be obtained via use of other techniques elsewhere in the process. Examples of other techniques include, but are not limited to, lower monomer content resins and gel coats, closed molding, vapor suppression, or installing a control device with an overall reduction efficiency of 95%.**
- (d) Optimized spray techniques according to a manner approved by IDEM shall be used for gel coats and filled resins (where fillers are required for corrosion or fire retardant purposes) at all times. Optimized spray techniques include, but are not limited to, the use of airless, air-assisted airless, high volume low pressure (HVLP), or other spray applicators demonstrated to the satisfaction of IDEM, OAQ, to be equivalent to the spray applicators listed above.**

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

- (e) The listed work practices shall be followed:**
  - (1) To the extent possible, a non-VOC, non-HAP solvent shall be used for cleanup.**
  - (2) Cleanup solvent containers used to transport solvent from drums to work stations shall be closed containers having soft gasketed spring-loaded closures.**
  - (3) Cleanup rags saturated with solvent shall be stored, transported, and disposed of in containers that are closed tightly.**
  - (4) The spray guns used shall be the type that can be cleaned without the need for spraying the solvent into the air.**

- (5) All solvent sprayed during cleanup or resin changes shall be directed into containers, such containers shall be closed as soon as solvent spraying is complete and the waste solvent shall be disposed of in such a manner that evaporation is minimized.
- (6) Storage containers used to store VOC- and/or HAP- containing materials shall be kept covered when not in use.

**D.2.3 Particulate Matter (PM) [326 IAC 6-3-2]**

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Pursuant to 326 IAC 6-3-2(c), particulate matter emissions shall be limited as follows:

- (a) Particulate matter as overspray from the gel coat booth B-7 and resin booth B-8 shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

or

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

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour.}$$

- (b) The allowable PM emission rate from Prep Booth 1 and Prep Booth 2 shall not exceed 1.93 pounds per hour when operating at a total process weight rate of 650 pounds per hour. The pounds per hour limitation was calculated with the following equation:

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

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

**D.2.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]**

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A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for facilities B-7 and B-8 and their control devices.

## **Compliance Determination Requirements**

### **D.2.5 Volatile Organic Compounds (VOC) and Volatile Organic Hazardous Air Pollutants (HAP)**

Compliance with the VOC and volatile organic HAP content and usage limitations respectively contained in Conditions D.2.1 and D.2.2 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.

### **D.2.6 VOC and HAP Emissions**

Compliance with Conditions D.2.1 and D.2.2 for VOC and volatile organic HAP, respectively, shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound and volatile organic HAP usages for the most recent twelve (12) month period.

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

### **D.2.7 Particulate Matter (PM)**

In order to comply with D.2.3, the dry filters for PM control shall be in operation at all times when the gel and resin application booths B-7 and B-8 are in operation.

### **D.2.8 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 B-7 and B-8 facility stacks SV-7 and SV-8 while 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 stacks 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.2.9 Record Keeping Requirements**

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- (a) To document compliance with Conditions D.2.1 and D.2.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the volatile organic compounds (VOC) and volatile organic HAP emission limits established.
- (1) The usage by weight and monomer content of resin and gel coat used, and the usage by weight and VOC and volatile organic HAP 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 added to coatings and those used as cleanup solvents;
  - (2) A log of the dates of use;
  - (3) Method of application and other emission reduction techniques for each resin and gel coat used;
  - (4) The calculated total volatile organic HAP emitted from resin and gel coat usage for each month and for the compliance period; and
  - (5) The calculated total volatile organic compounds (VOC) emitted from all coatings, including resin and gel coat usage, for each month and for the compliance period.
- (b) To document compliance with Condition D.2.8, 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.2.10 Reporting Requirements**

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A quarterly summary of the information to document compliance with Conditions D.2.1 and D.2.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

3. Condition D.2.3(b) (New Source Toxics Control), re-numbered to Condition D.3.3(b), has been revised at the third paragraph to correct a typographical error in the stated equation.

D.23.3 New Source Toxics Control [326 IAC 2-4.1-1]

- (b) Resins and gel coats used, including filled resins and tooling resins and gel coats, shall be limited to a maximum of 35 percent (35%) by weight for resins, 37 percent (37%) by weight for gel coats or their equivalent on an emissions mass basis. Monomer contents shall be calculated on a neat basis, i.e., excluding any filler. Compliance with these monomer content limits shall be demonstrated on a monthly basis.

The use of resins with monomer contents lower than 35%, gel coats with monomer contents lower than 37%, and/or additional emission reduction techniques approved by IDEM, OAQ, may be used to offset the use of resins with monomer contents higher than 35%, and/or gel coats with monomer contents higher than 37%. This is allowed to meet the monomer content limits for resins and gel coats, and shall be calculated on an equivalent emissions mass basis as shown below:

$$\frac{(\text{Emissions from } >35\% \text{ resin or } >37\% \text{ gel coat}) - (\text{Emissions from } 35\% \text{ resin or } 37\% \text{ gel coat})}{\# \#} = \frac{(\text{Emissions from } <35\% \text{ resin, } <37\% \text{ gel coat, and/or other emission reduction techniques})}{\# \#}$$

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

EF, Monomer emission factor = emission factor, expressed as % styrene emitted per weight of resin applied, which is indicated by the monomer content, method of application, and other emission reduction techniques for each gel coat and resin used.

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

**Part 70 Source Modification Quarterly Report**

Source Name: Covermaster, Inc.  
 Source Address: 57784 C.R. 3, Elkhart, Indiana 46517  
 Mailing Address: 57784 C.R. 3, Elkhart, Indiana 46517  
 Source Modification Part 70 Permit No.: ~~SSM~~ T039-12770-00137  
 Facility: gel coat booth B-7 & chop coat booth B-8  
 Parameter: volatile organic compounds (VOC) and volatile organic hazardous air pollutants (HAPs)  
 Limit: (a) Use of resins, gel coats and clean-up solvents, as well as VOC delivered to the applicators, shall be limited such that the potential to emit (PTE) VOC from resin and gel coat applications shall be limited to less than 100 tons per twelve (12) consecutive month period.  
 (b) Use of resins and gel coats shall be limited such that the total potential to emit (PTE) volatile organic hazardous air pollutant (HAP) from resins and gel coats only shall be less than 100 tons per twelve (12) consecutive month period. Compliance with this limit shall be determined based upon the following criteria:  
 (1) When applying gel coats and resins, VOC emissions shall be calculated by multiplying the material usage by the appropriate emission factor based on the monomer content, method of application, and other emission reduction techniques, and summing the emissions for all gel coats and resins.  
 (2) Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA- approved form, emission factors for the gel coat and resin applications shall be taken from the following reference approved by IDEM, OAQ: "CFA Emission Models for the Reinforced Plastics Industries," Composites Fabricators Association, February 28, 1998 (updated as the "Unified Emission Factors for Open Molding of Composites" ("CFA Factors", April 1999). For the purposes of these emission calculations, monomer in resins and gel coats that is not styrene shall be considered as styrene on an equivalent weight basis.  
 (3) When applying coatings and VOC solvents other than gel coats and resins, VOC emissions shall be calculated using an emission factor of 2,000 pounds of VOC emitted per ton of VOC used.  
 YEAR: \_\_\_\_\_

Month	Emitted This Month (tons)		Emitted Previous 11 Months (tons)		Total Emitted 12 Months (tons)	
	VOC	volatile organic HAPs	VOC	volatile organic HAPs	VOC	volatile organic HAPs
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: \_\_\_\_\_

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

#### Source Background and Description

**Source Name:** Covermaster, Inc.  
**Source Location:** 57784 C.R. 3, Elkhart, Indiana 46517  
**County:** Elkhart  
**SIC Code:** 3799  
**Operation Permit No.:** T039-7354-00137  
**Permit Reviewer:** Michael Hirtler / EVP

The Office of Air Management (OAM) has reviewed a Part 70 permit application from Covermaster, Inc. relating to the operation of a fiberglass truck cap and component manufacturing source.

#### Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices, which are separated listed under two (2) groups identified by the source as Plant #1 and Plant #2, corresponding to onsite production Buildings #1 and #2, respectively:

##### Plant #1:

- (a) One (1) resin chop coat booth identified as B-1, constructed October 11, 1995, producing a maximum of 8.125 fiberglass units per hour, equipped with a high volume low pressure (HVLP) spray application system consisting of one (1) airless chop gun and dry filter for particulate matter overspray control, and exhausting at one (1) stack identified as SV-1.
- (b) One (1) gel coat application booth identified as B-2, constructed October 11, 1995, producing a maximum of 8.125 fiberglass units per hour, equipped with a high volume low pressure (HVLP) spray application system consisting of three (3) spray guns for color changes, using only one (1) gun at a time, and dry filter for particulate matter overspray control, and exhausting at one (1) stack identified as SV-2.
- (c) One (1) cut and grind booth identified as B-4, constructed October 11, 1995, processing 656 pounds of fiberglass product per hour, equipped with four (4) Torit dust collectors for particulate matter control respectively identified as GRDC-1, GRDC-2, GRDC-3 and GRDC-4, each exhausting inside the building.
- (d) One (1) mold construction and rail assembly booth identified as B-5, constructed October 20, 1995, producing a maximum of 8.125 fiberglass units per hour and 1 mold per month, equipped with one (1) airless resin chop gun and dry filter for particulate matter overspray control, and exhausting at one (1) stack identified as SV-5.

- (e) One (1) spray paint booth identified as B-6, constructed October 20, 1995, coating a maximum of 8.125 fiberglass units per hour, equipped with a high volume low pressure (HVLP) spray application system consisting of two (2) spray guns and dry filter for particulate matter overspray control, and exhausting at four (4) stacks collectively identified as SV-6.

Plant #2:

- (a) One (1) paint booth constructed July 16, 1998, coating a maximum of 195 fiberglass truck caps per day, equipped with a high volume low pressure (HVLP) spray application system consisting of one (1) basecoat gun and one (1) clear coat gun and dry filter for particulate matter overspray control, and exhausting at two (2) stacks identified as SV-14 and SV-15.
- (b) One (1) mold repair area consisting of three (3) fiberglass mold production booths, constructed July 16, 1998, producing a maximum of 12 molds per week, equipped with a total of two (2) high volume low pressure (HVLP) spray guns and one (1) flow coater chop gun, with dry filter for particulate matter overspray control, and exhausting at three (3) stacks SV-16 through SV-18.
- (c) One (1) production area constructed July 16, 1998, producing a maximum of 195 fiberglass truck caps per day and consisting of:
  - (1) One (1) chop booth equipped with one (1) flow coater chop gun exhausting at two (2) stacks identified as SV-1 and SV-2, and
  - (2) One (1) gel coat application booth equipped with a high volume low pressure (HVLP) spray application system consisting of three (3) spray guns for color changes, using only one (1) gun at a time, with dry filter for particulate matter overspray control, and exhausting at one (1) stack identified as SV-3.
- (d) One Plant #2 Grind Booth for miscellaneous cutting and sanding operations for fiberglass and wood, constructed July 16, 1998, processing 730 pounds of product per hour, consisting of twelve (12) DA sanders, six (6) buffers, three (3) hand cutters, two (2) band saws, and two (2) table saws, exhausting at one (1) stack identified as SV-7.

**Insignificant Activities**

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour, including the following facilities that were specifically listed in previously issued construction permits:
  - (1) Four (4) air make-up systems with a maximum heat input rate of 6.3 million British thermal units per hour per facility, each exhausting through one (1) stack respectively identified as AM-1 through AM-4 (Plant #1);
  - (2) One (1) natural gas fired furnace with a maximum heat input rate of 0.464 million British thermal units per hour, exhausting through stack one (1) stack identified as SV-19 (Plant #1);

- (3) One (1) natural gas fired curing oven with a maximum heat input rate of 2.0 million British thermal units per hour exhausting through stack SV-20 (Plant #2);
  - (4) Two (2) air make-up units fired by natural gas with maximum heat input rates of 2.97 and 2.00 million British thermal units per hour, exhausting through stacks AM-1 and AM-2, respectively (Plant #2);
  - (5) Four (4) radiant tube heaters fired by natural gas with a maximum heat input rate of 0.1 million British thermal units per hour per facility, each exhausting through one (1) stack respectively identified as SV-3, SV-5, SV-6, and SV-13 (Plant #2); and
  - (6) Four (4) natural gas fired Lare radiant tube heaters with a maximum heat input rate of 0.15 million British thermal units per hour per facility, each exhausting through one (1) stack respectively identified as SV-8, SV-9, SV-10, and SV-12 (Plant #2).
- (b) The following VOC and HAP storage containers:
- (1) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.
  - (2) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (c) Equipment used exclusively for the filling of drums, pails or other packaging containers with lubricating oils, waxes and greases.
- (d) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6, including two (2) Safety-Kleen wash tanks each at a capacity of 660 gallons and containing pure grade lacquer thinner.
- (e) Cleaners and solvents characterized as follows:
- (1) having a vapor pressure equal to or less than 2 kPa; 15mm Hg; or 0.3 psi measured at 38 degrees C (100EF) or;
  - (2) having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20EC (68EF);
- the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (f) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment and welding equipment.
- (g) Closed loop heating and cooling systems.
- (h) Solvent recycling systems with batch capacity less than or equal to 100 gallons.

- (i) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs.
- (j) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs.
- (k) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (l) Paved and unpaved roads and parking lots with public access.
- (m) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (n) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals (kPa) measured at 38 degrees C).
- (o) Other activities and categories with emissions below insignificant thresholds:
  - (1) One (1) touch-up gun and two (2) cup guns in the Final Finish Area;
  - (2) Two (2) resin mix tanks for mixing resin with inert ingredients (Plant #1);
  - (3) One (1) resin mix tank for mixing resin with inert ingredients (Plant #2);
  - (4) One (1) 3,000 gallon resin storage tank (Plant #1);
  - (5) One (1) paint storage and mixing room (Plant #1) identified as B-9, exhausting to one (1) stack;
  - (6) One (1) paint storage and mixing room (Plant #2) exhausting to one (1) stack; and
  - (7) Two (2) welders (Note: these units are used for maintenance activities only and do not meet the definition of "process" pursuant to 326 IAC 1-2-58; therefore, the requirements of 326 IAC 6-3, Process Operations, does not apply).

### Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (a) Construction Permit CP 039-2355-00137, issued on March 25, 1993.
- (b) Construction Permit CP 039-4510-00137, issued on October 11, 1995.
- (c) Construction Permit CP 039-9337-00137, issued on July 15, 1998.

All conditions from previous approvals were incorporated into this Part 70 permit. However, descriptive changes have been made to two(2) facilities listed in the **Permitted Emission Units and Pollution Control Equipment** section above, as described below:

- (a) Construction Permit CP 039-4510-00137, issued on October 11, 1995.

OAM received a notification from the source on September 14, 1998 that it would replace the Cut and Grind Booth B-4 (Plant #1) particulate matter control system from the existing external exhaust fan with dry filter to four (4) Torit dust collectors that will each exhaust inside the building. OAM assigned Administrative Change No. A039-10184-00137 to the source notification, but no action was taken on the Administrative Change. The new control system has an improved efficiency and exhausts internally and, therefore, there will be no emissions increase associated with the change. No conditions of CP 039-4510-00137 are affected by the new control system; therefore, approval of this permit and the equipment listed herein, including the four (4) Torit dust collectors, approves A039-10184-00137.

- (b) Construction Permit CP 039-9337-00137, issued on July 15, 1998.

As part of the preparation of this Part 70 permit, the source has requested that the description of the Plant #2 mold repair area be revised from "*producing a maximum of 2.5 molds per week*" to "*producing a maximum of 12 molds per week*". The uncontrolled potential to emit (PTE) volatile organic compounds (VOC) and particulate matter (PM) from this facility is 0.82 and 0.42 tons per year (tpy), respectively, at a production rate of 12 molds per week (see page 6 of 7, Appendix A). This is equivalent to 0.187 and 0.096 pounds per hour (lb/hr) for VOC and PM, respectively. The uncontrolled PTE values are below the applicable 326 IAC 2-7-1(21) thresholds for insignificant activities of 3 and 5 lb/hr for VOC and PM, respectively, and the applicable 326 IAC 2-7-10.5(d)(4) minor source modification threshold level of 10 tpy for both pollutants. Also, no conditions of CP 039-4510-00137 are affected by the revised facility description, including the existing BACT and MACT determination conditions as the established PTE limits under each determination are not being increased. Therefore, approval of this Part 70 permit shall serve to approve the change to 12 molds per week for this facility.

### **Enforcement Issue**

There are no enforcement actions pending.

### **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 December 4, 1996. Additional information was received on August 23, 2000, August 24, 2000 and September 14, 2000.

A notice of administrative completeness letter was mailed to the source on December 12, 1996.

### Emission Calculations

See Appendix A of this document for detailed emissions calculations (seven (7) pages).

### Potential To Emit

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

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	greater than 100
PM-10	greater than 100
SO <sub>2</sub>	less than 100
VOC	greater than 100
CO	less than 100
NO <sub>x</sub>	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 To Emit (tons/year)
methyl ethyl ketone (MEK)	greater than 10
methyl isobutyl ketone (MIBK)	less than 10
Toluene	greater than 10
Xylene	greater than 10
Glycol ethers	less than 10
Methanol	less than 10
Styrene	greater than 10
Dimethyl phthalate	greater than 10
Ethyl benzene	less than 10
TOTAL	greater than 25

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of PM-10 and VOC are both 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 to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) the combination of 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 twenty-eight (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 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 1998 OAM emission data and applicant supplied information for HAP (styrene) actual emission estimate.

Pollutant	Actual Emissions (tons/year)
PM	0.62
PM-10	0.62
SO <sub>2</sub>	0.04
VOC	61.5
CO	1.8
NO <sub>x</sub>	5.2
HAP (styrene)	22.1

**Potential to Emit After Issuance**

The table below summarizes the potential to emit, reflecting all limits, of the significant and insignificant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 operating permit.

Process/facility	Potential to Emit (tons/year)						
	PM	PM-10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
Plant #1 - chop coat booth (B-1); gel coat booth (B-2); mold booth (B-5); & paint booth (B-6)	2.2	2.2	0.0	138.0 *	0.0	0.0	<138.0 *
Plant #2 - paint booth; mold repair area consisting of three (3) fiberglass mold production booths; production area consisting of one chop booth and one gel coat booth	0.8	0.8	0.0	95.3 **	0.0	0.0	95.3 ***
Natural Gas Combustion ****	0.1	0.5	0.0	0.4	5.2	6.4	0.1
<b>Total Emissions</b>	<b>3.1</b>	<b>3.5</b>	<b>0.0</b>	<b>233.7</b>	<b>5.2</b>	<b>6.4</b>	<b>233.4</b>

\* Based on Operation Condition 4 of Construction Permit CP039-4510-00137, issued October 11, 1995. While this permit does not limit HAP emissions by condition, compliance with Condition 4 coincidentally limits related HAP emissions to 138.0 tons or less per 12 consecutive month period.

\*\* Based on Operating Condition D.1.2 of Construction Permit CP089-9337-00435, issued June 15, 1998.

\*\*\* Based on Operating Condition D.1.3 of Construction Permit CP089-9337-00435, issued June 15, 1998. This limit specifically applies to volatile organic HAPs from resin and gel coat usage only.

\*\*\*\* Insignificant Activities.

### County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM-10	attainment
SO <sub>2</sub>	attainment
NO <sub>2</sub>	attainment
Ozone	maintenance
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO<sub>x</sub>) are precursors for the formation of ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as maintenance for ozone. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Elkhart County has been classified as attainment or unclassifiable for the remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

### 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:

- (a) 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.
- (b) 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) 40 CFR Part 60, Subparts K, Ka, and Kb (Standards of Performance for Petroleum Liquid Storage Vessels and Volatile Liquid Storage Vessels)

The Plant #1 resin storage tank with a storage capacity of 3,000 gallons is not subject to the New Source Performance Standard, 326 IAC 12, (40 CFR Parts 60.110; 110a - 115a; and 110b - 117b, as Subparts K, Ka, and Kb, respectively) since the tank storage capacity is below the minimum applicable threshold to the three rules (i.e., 40 cubic meters (10,568 gallons)).

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

- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 61) applicable to this source.
- (c) The degreasing operations, as an insignificant activity that includes two (2) 660 gallon Safety-Kleen wash tanks, are not subject to the National Emission Standards for Hazardous Air Pollutants, 326 IAC 20, (40 CFR 63, Subpart T). Subpart T applies to degreasing operations using one of six listed halogenated solvents, or any combination of the solvents in a concentration greater than 5 percent by weight, as a cleaning or drying agent. The source does not use the regulated halogenated solvents in the degreasing operations; therefore, Subpart T does not apply.

Currently there are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 20 and 40 CFR Part 63) applicable to this source. However, the United States Environmental Protection Agency (US EPA) has established the *Reinforced Plastic Composites Production* and the *Plastic Parts and Products (Surface Coating)* source categories as those requiring hazardous air pollutant control and has tentatively established August 2001 and December 2001 as the final rule promulgation dates, respectively. The source shall evaluate applicability to each rule upon its promulgation and shall comply with the applicable rules. This requirement has been included in the Part 70 permit as Conditions D.1.1 and D.2.1.

#### **State Rule Applicability - Entire Source**

##### **326 IAC 1-5-2 (Emergency Reduction Plans)**

The source has submitted an Emergency Reduction Plan (ERP) on October 14, 1998. The ERP has been verified to fulfill the requirements of 326 IAC 1-5-2 (Emergency Reduction Plans).

##### **326 IAC 2-2 and 40 CFR 52.21 (Prevention of Significant Deterioration, PSD)**

Elkhart County has been classified as attainment or maintenance for the criteria pollutants. This source has not operated as a major stationary source because no attainment pollutant has been emitted at a rate of 250 tons per year or greater and the source is not in one of the 28 listed source categories. Additionally, pursuant to Construction Permits CP 039-4510-00137 and CP 039-9337-00137, respectively issued on October 11, 1995 and July 15, 1998, the source shall limit VOC usage such that the potential to emit VOC is limited to 138.0 tons per 12 consecutive month period (CP 039-4510) and 95.3 tons per 12 consecutive month period (CP 039-9337). Compliance with these requirements shall have the combined effect of limiting the source-wide PTE of VOC to less than 250 tons per 12 consecutive month period. Therefore, pursuant to 326 IAC 2-2 and 40 CFR 52.21, the PSD requirements 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 ten (10) tons per year of volatile organic compounds and it is located in Elkhart County. 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 April 15 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 (Opacity Limitations)**

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

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

**326 IAC 6-4 (Fugitive Dust Emissions)**

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

**State Rule Applicability - Individual Facilities**

**326 IAC 2-4.1-1 (New Source Toxics Control)**

Pursuant to 326 IAC 2-4.1-1 (New Source Toxics Control), any new process or production unit, which in and of itself emits or has the PTE 10 tons per year of any HAP or 25 tons per year of the combination of HAPs, and is constructed or reconstructed after July 27, 1997, must be controlled using technologies consistent with Maximum Achievable Control Technology (MACT).

Construction permit CP039-4510-00137 was issued on October 11, 1995, which permitted the construction of the Plant #1 facilities prior to the July 27, 1997 rule applicability date. Therefore, the requirements of this rule do not apply to these facilities.

Construction permit CP039-9337-00137 was issued on July 15, 1998, which permitted the construction of the Plant #2 facilities after the July 27, 1997 rule applicability date with potential emissions greater than 10 tons per year of a single HAP (as styrene) and 25 tons per year of the combination of HAPs. Therefore, the requirements of this rule were determined to apply. Pursuant to rule requirements, a maximum achievable control technology (MACT) analysis was performed for the Plant #2 paint booth, mold production booths, resin chop booth and gel coat booth. Pursuant to Condition D.1.3 of CP039-9337-00137, the source shall perform work practice standards as specified and shall limit the use of resins and gel coats such that the potential to emit volatile organic HAP from resin and gel coat usage only is limited to less than 95.3 tons per twelve (12) consecutive month period.

326 IAC 6-3-2 (Process Operations)

The equipment listed at (f) in the **Insignificant Activity** section of this TSD, with a process weight rate less than 100 pounds per hour, shall be limited pursuant to Condition C.1 (Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour), as follows:

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.

There will be no compliance monitoring condition inserted into the permit since the insignificant activity has no control device and does not have actual emissions exceeding 25 tons per year.

326 IAC 6-3-2 (Process Operations)

Pursuant to 326 IAC 6-3-2(c), particulate matter emissions from Plant #1 shall be limited as follows:

- (a) Particulate matter as overspray from the resin chop coat booth B-1, gel coat application booth B-2, mold construction and rail assembly booth B-5, and spray paint booth B-6, each shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

or

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

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour.}$$

**Compliance Calculation**

Due to variability in the number of units produced, painted, the types of coatings used and the weights of the units processed, no emissions rate limit has been calculated for the coating facilities. These facilities will be assumed to comply with the rule provided the dry filter controls are in place and functioning properly at all times that the surface coating booths are in operation.

- (b) The allowable PM emission rate from cut and grind booth B-4 shall not exceed 1.94 pounds per hour when operating at a process weight rate of 656 pounds per hour. The pounds per hour limitation was calculated with the following equation:

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

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

**Compliance Calculation**

Again, due to variability in the number of units ground and sanded, and the weights of the units processed, a worst case emissions rate limit has been calculated for the grinding and sanding operations assuming an uncontrolled emission factor of 1 pound PM emitted per ton of material ground/sanded. The potential PM emission rate for B-4:

$$\begin{aligned} &= 656 \text{ lbs product / hour} * 1 \text{ ton product / 2000 lbs product} * 1 \text{ lb PM / ton product} \\ &= 0.328 \text{ lbs PM / hour (uncontrolled)} \\ &= 0.328 \text{ lbs PM / hour} * (1-99\% \text{ control efficiency}) \\ &= 0.003 \text{ lbs PM / hour (controlled)} \end{aligned}$$

$$\begin{aligned} &= 4.10 P^{0.67} \\ &= 4.10 (656/2000)^{0.67} \\ &= 1.94 \text{ lbs PM per hour} \end{aligned}$$

Based on these calculations, the controlled potential emissions are less than the allowable emissions. Therefore, the cut and grind booth B-4 shall comply with 326 IAC 6-3-2 by using a PM dust control system at all times during operation. However, there will be no compliance monitoring conditions inserted into the permit as the unit, having a control device, does not have allowable emissions exceeding 10 pounds per hour. Additionally, the facility control device exhausts into the production building and not directly to the atmosphere.

**326 IAC 6-3-2 (Process Operations)**

Pursuant to 326 IAC 6-3-2(c), particulate matter emissions from Plant #2 shall be limited as follows:

- (a) Pursuant to CP 039-9337-00137, issued on July 15, 1998, the particulate matter as overspray from the Plant #2 paint booth, three (3) fiberglass mold production booths, and the production area chop booth and gel coat application booth, each shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

or

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

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour.}$$

The dry filters shall be in operation at all times the coating facilities are in operation in order to comply with this limit.

- (b) The allowable PM emission rate from miscellaneous cutting and sanding operations at the Plant #2 Grind Booth shall not exceed 2.08 pounds per hour when operating at a process weight rate of 730 pounds per hour. The pounds per hour limitation was calculated with the following equation:

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

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

#### **Compliance Calculation**

Due to variability in the number of units cut and sanded, and the weights of the units processed, a worst case emissions rate limit has been calculated for the facility operations assuming an uncontrolled emission factor of 1 pound PM emitted per ton of material cut/sanded. The potential PM emission rate for the Plant #2 Grind Booth:

$$= 730 \text{ lbs product / hour} * 1 \text{ ton product / 2000 lbs product} * 1 \text{ lb PM / ton product} \\ = 0.328 \text{ lbs PM / hour (uncontrolled); } = 1.44 \text{ tons per year @ 8,760 hours per year}$$

$$= 4.10 P^{0.67} \\ = 4.10 (730/2000)^{0.67} \\ = 2.08 \text{ lbs PM per hour}$$

Based on these calculations, which are derived from Appendix A of the TSD to Construction Permit 039-9337-00137, issued July 15, 1998, the uncontrolled potential emissions are less than the allowable emissions and the Plant #2 Grind Booth shall comply with 326 IAC 6-3-2. There will be no compliance monitoring conditions inserted into the permit since the facility, having no control device, does not have actual emissions exceeding 25 tons per year.

### 326 IAC 8-1-6 (General Reduction Requirements)

This rule applies to facilities located anywhere in the state that were constructed on or after January 1, 1980, and which have potential volatile organic compound (VOC) emissions of 25 tons per year or more and are not otherwise regulated by other provisions of Article 8.

- (a) Construction permit CP039-4510-00137 was issued on October 11, 1995, which permitted the construction of the Plant #1 facilities with potential VOC emissions greater than 25 tons per year. Therefore, the requirements of this rule were determined to apply. Pursuant to rule requirements, a best available control technology (BACT) analysis was performed for the Plant #1 resin chop coat booth B-1, gel coat application booth B-2, mold construction and rail assembly booth B-5, and spray paint booth B-6. Pursuant to Operation Conditions 4 and 5 of CP039-9337-00137, BACT is determined to be a VOC input usage limit that limits the potential to emit VOC to no greater than 138.0 tons per twelve (12) consecutive month period; and the following work practice standards:

- (1) Utilize low styrene concentration in the resin used in chop coat booth B-1 and gel coat booth B-2;
- (2) Utilize high quality resin and gel coat in mold construction booth B-5, also reduce the quantity of mold construction which would be one (1) mold construction per month;
- (3) Low VOC content and high solids in the paint shall be used in paint booth B-6;
- (4) Low VOC resin shall be used in the rail assembly at mold construction booth B-5;
- (5) All paint guns shall be high volume low pressure (HVLP) resulting in less usage with the high transfer efficiency of 75 percent;
- (6) The solvent used to clean up spray guns and other tools shall be discharged into containers, and these containers shall be covered at all other times.

The affected coating facilities comply with these requirements.

- (b) Construction permit CP039-9337-00137 was issued on July 15, 1998, which permitted the construction of the Plant #2 facilities with potential VOC emissions greater than 25 tons per year. Therefore, the requirements of this rule were determined to apply. Pursuant to rule requirements, a best available control technology (BACT) analysis was performed for the Plant #2 paint booth, three (3) fiberglass mold production booths, and the production area chop booth and gel coat application booth. Pursuant to Conditions D.1.2 and D.1.3 of CP039-9337-00137, BACT is determined as a VOC input usage limit that limits the potential to emit VOC to less than 95.3 tons per twelve (12) consecutive month period; and the requirements of 326 IAC 2-4.1-1 (New Source Toxics Control) as follows:

- (1) Use of resins and gel coats shall be limited such that the total potential to emit (PTE) volatile organic hazardous air pollutant (HAP) from resins and gel coats only shall be less than 95.3 tons per twelve (12) consecutive month period. Compliance with this limit shall be determined based upon the following criteria:

- (A) Monthly usage by weight, monomer content, method of application, and other emission reduction techniques for each gel coat and resin shall be recorded. Volatile organic HAP emissions shall be calculated by multiplying the usage of each gel coat and resin by the emission factor that is appropriate for the monomer content, method of application, and other emission reduction techniques for each gel coat and resin, and summing the emissions for all gel coats and resins. Emission factors shall be obtained from the reference approved by IDEM, OAM.
- (B) Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA-approved form, emission factors shall be taken from the following reference approved by IDEM, OAM: "CFA Emission Models for the Reinforced Plastics Industries", Composites Fabricators Association, February 28, 1998, and shall not exceed 32.3% styrene emitted per weight of gel coat applied and 17.7% styrene emitted per weight of resin applied. For the purposes of these emission calculations, monomer in resins and gel coats that is not styrene shall be considered as styrene on an equivalent weight basis.
- (2) Resins and gel coats used, including filled resins and tooling resins and gel coats, shall be limited to a maximum of 35 percent (35%) by weight for resins, 37 percent (37%) by weight for gel coats or their equivalent on an emissions mass basis. Monomer contents shall be calculated on a neat basis, i.e., excluding any filler. Compliance with these monomer content limits shall be demonstrated on a monthly basis.

The use of resins with monomer contents lower than 35%, gel coats with monomer contents lower than 37%, and/or additional emission reduction techniques approved by IDEM, OAM, may be used to offset the use of resins with monomer contents higher than 35%, and/or gel coats with monomer contents higher than 37%. This is allowed to meet the monomer content limits for resins and gel coats, and shall be calculated on an equivalent emissions mass basis as shown below:

$$(\text{Emissions from } >35\% \text{ resin or } >37\% \text{ gel coat}) - (\text{Emissions from } 35\% \text{ resin or } 37\% \text{ gel coat}) \# (\text{Emissions from } 35\% \text{ resin or } 37\% \text{ gel coat}) - (\text{Emissions from } <35\% \text{ resin, } <37\% \text{ gel coat, and/or other emission reduction techniques}).$$

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

EF, Monomer emission factor = emission factor, expressed as % styrene emitted per weight of resin applied, which is indicated by the monomer content, method of application, and other emission reduction techniques for each gel coat and resin used.

- (3) Flow coaters, a type of non-spray application technology of a design and specifications to be approved by IDEM, OAM, shall be used to apply 100% of all neat resins used. If it is not possible to apply neat resins with flow coaters, equivalent emissions reductions must be obtained via use of other techniques elsewhere in the process. Examples of other techniques include, but are not limited to, lower monomer content resins and gel coats, closed molding, vapor suppression, or installing a control device with an overall reduction efficiency of 95%.
- (4) Optimized spray techniques according to a manner approved by IDEM shall be used for coatings, gel coats and filled resins (where fillers are required for corrosion or fire retardant purposes) at all times. Optimized spray techniques include, but are not limited to, the use of airless, air-assisted airless, high volume low pressure (HVLP), or other spray applicators demonstrated to the satisfaction of IDEM, OAM, to be equivalent to the spray applicators listed above.

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

- (5) The listed work practices shall be followed:
  - (A) To the extent possible, a non-VOC, non-HAP solvent shall be used for cleanup.
  - (B) Cleanup solvent containers shall be used to transport solvent from drums to work.
  - (C) Clean up stations shall be closed containers having soft gasketed spring-loaded closures and shall be kept completely closed when not in use.
  - (D) Cleanup rags saturated with solvent shall be stored, transported, and disposed of in containers that are closed tightly.
  - (E) The spray guns used shall be the type that can be cleaned without the need for spraying the solvent into the air.
  - (F) All solvent sprayed during cleanup or resin changes shall be directed into containers. Such containers shall be closed as soon as solvent spraying is complete and the waste solvent shall be disposed of in such a manner that evaporation is minimized.
  - (G) Storage containers used to store VOC- and/or HAP- containing materials shall be kept covered when not in use.

These requirements are incorporated into the Part 70 permit as Conditions D.2.2 and D.2.3. The affected coating facilities comply with these requirements.

### 326 IAC 8-3-2 (Cold Cleaner Operations)

The source, located in Elkhart County, and maintaining two (2) Safety-Kleen wash tanks each at a capacity of 660 gallons and containing pure grade lacquer thinner, is subject to the applicable rule requirements since the facilities are new after January 1, 1980. As such, and pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, the owner or operator shall ensure that the following requirements are met for each of the two (2) 660 gallon Safety-Kleen wash tanks:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

The source complies with these requirements for the two (2) cold cleaning facilities.

### 326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control)

The source, located in Elkhart County, and maintaining two (2) Safety-Kleen wash tanks without remote solvent reservoirs, each at a capacity of 660 gallons and containing pure grade lacquer thinner, is subject to the applicable rule requirements since the facilities are new after July 1, 1990. As such:

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility construction of which commenced after July 1, 1990, shall ensure that the following control equipment requirements are met for each of the two (2) 660 gallon Safety-Kleen wash tanks:
  - (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
    - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
    - (B) The solvent is agitated; or
    - (C) The solvent is heated.

- (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
  - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
  - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
  - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9EC) (one hundred twenty degrees Fahrenheit (120EF)):
    - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
    - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
    - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility construction of which commenced after July 1, 1990, shall ensure that the following operating requirements are met for each of the two (2) 660 gallon Safety-Kleen wash tanks:
- (1) Close the cover whenever articles are not being handled in the degreaser.
  - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
  - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

The source complies with these requirements for the two (2) cold cleaning facilities.

**326 IAC 8-6 (Organic Solvent Emission Limitations)**

This rule applies to sources commencing operation after October 7, 1974 and prior to January 1, 1980, located anywhere in the state, with potential solvent VOC emissions of 100 tons per year or more, and not regulated by any other provision of Article 8. This source was constructed after January 1, 1980. Therefore, this rule does not apply to this source.

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

The requirements of this rule apply to stationary sources located in Lake, Porter, Clark and Floyd Counties that emit or have the potential to emit VOCs at levels equal to or greater than 25 tons per year in Lake and Porter Counties; 100 tons per year in Clark and Floyd Counties; and to any coating facility that emits or has the potential to emit 10 tons per year or greater in Lake, Porter, Clark or Floyd County. The source is located in Elkhart County. Therefore, this rule is not applicable to this source.

**326 IAC 8-9-1 (Volatile Organic Liquid Storage Vessels)**

Pursuant to 326 IAC 8-9-1, on and after October 1, 1995 stationary vessels used to store volatile organic liquids (VOL) must comply with the requirement of the rule if located in Clark, Floyd, Lake or Porter Counties. This rule is not applicable to this source since it is located in Elkhart County.

**Testing Requirements**

Compliance testing is not required of this source since the resin and gel coat material usage and related VOC and volatile organic HAP emissions data relies on current Composites Fabricators Association (CFA) emission factors, which are accepted by USEPA; and the surface coating material usage assumes a VOC emission factor of 2,000 pounds of VOC emitted per ton of VOC input to the coating operation.

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

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

1. The Plant #1 chop coat booth B-1; gel coat booth B-2; mold construction booth B-5; and spray paint booth B-6 have applicable compliance monitoring conditions as specified below:
  - (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 surface coating booth stacks SV-1, SV-2, SV-5 and SV-6 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 stacks 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.

These monitoring conditions are necessary because the dry filters for the coating facilities must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

2. The Plant #2 paint booth, mold repair area consisting of three (3) fiberglass mold production booths, and production area consisting of (1) chop booth and one (1) gel coat booth have applicable compliance monitoring conditions as specified below:
  - (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 paint booth stacks SV-14 and SV-15; mold production booth stacks SV-16, SV-17 and SV-18; and production area gel coat booth stack SV-3, while 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 stacks 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.

These monitoring conditions are necessary because the dry filters for the coating facilities must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

### **Conclusion**

The operation of this fiberglass truck cap and component manufacturing source shall be subject to the conditions of the attached proposed Part 70 Permit No. T039-7354-00137.

**Appendix A: Emissions Summary (Page 1 of 7)**

**Company Name: Covermaster, Inc.**

**Address City IN Zip: 57784 C.R. 3, Elkhart, Indiana 46517**

**Part 70 No.: T039-7354-00137**

**Reviewer: Michael Hirtler / EVP**

**Date: September 2000**

**Potential Uncontrolled Emissions (tons/year)**

**Emissions Generating Activity**

Pollutant	Natural Gas Combustion	Fiberglass Parts Spray Painting	Fiberglass Parts Production and Mold Making/Repair	Total
PM	0.1	12.0	460.7	472.9
PM-10	0.5	12.0	460.7	473.3
SO2	0.0	0.0	0.0	0.0
NOx	6.4	0.0	0.0	6.4
VOC	0.4	87.6	485.3	573.3
CO	5.2	0.0	0.0	5.2
Single HAP	0.1	18.7	373.9	392.6
Total HAPs	0.1	48.5	408.6	457.2

Total Uncontrolled Potential Emissions based on rated capacity assuming operations at 8,760 hours per year.

**Limited Emissions (tons/year)**

**Emissions Generating Activity**

Pollutant	Natural Gas Combustion	Fiberglass Parts Spray Painting	Fiberglass Parts Production and Mold Making/Repair	Total
PM	0.1	0.1	2.9	3.1
PM-10	0.5	0.1	2.9	3.5
SO2	0.0	0.0	0.0	0.0
NOx	6.4	0.0	0.0	6.4
VOC	0.4	233.3 *		233.7
CO	5.2	0.0	0.0	5.2
Single HAP	0.1	233.3 *		233.4
Total HAPs	0.1	233.3 *		233.4

\* Total Limited Emissions based on rated capacity assuming limited operations, after controls. This includes a Plant #1 VOC limit of 138 tons per 12 consecutive month period based upon CP 039-4510-00137, issued October 11, 1995; and a Plant #2 VOC and HAP limit of 95.3 tons per 12 consecutive month period, based upon CP 039-9337-00137, issued July 15, 1998.

**Appendix A: Emissions Calculations  
Natural Gas Combustion Only  
MM BTU/HR <100**

**Company Name: Covermaster, Inc.  
Address City IN Zip: 57784 C.R. 3, Elkhart, Indiana 46517  
Part 70 No.: T039-7354-00137  
Reviewer: Michael Hirtler / EVP  
Date: September 2000**

Total Heat Input Capacity MMBtu/hr		Total Potential Throughput MMCF/yr	
1.0	(units <=0.3 MMBtu/hr)	8.8	(units <=0.3 MMBtu/hr)
13.7	(units >0.3 MMBtu/hr)	120.3	(units >0.3 MMBtu/hr)

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	94.0	5.5	40.0
				100.0		84.0
				**see below		**see below
Potential Emission in tons/yr	0.1	0.5	0.0	6.4	0.4	5.2

\*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

\*\*Emission Factors for NOx: Uncontrolled = 94 for heat input capacity <=3 MMBtu/hr; = 100 for heat input capacity >3 MMBtu/hr

\*\*Emission Factors for CO: Uncontrolled = 40 for heat input capacity <=3 MMBtu/hr; = 84 for heat input capacity >3 MMBtu/hr

**Methodology**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPL. D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

**Appendix A: Emissions Calculations  
Natural Gas Combustion Only  
MM BTU/HR <100  
HAPs Emissions**

**Company Name: Covermaster, Inc.  
Address City IN Zip: 57784 C.R. 3, Elkhart, Indiana 46517  
Part 70 No.: T039-7354-00137  
Reviewer: Michael Hirtler / EVP  
Date: September 2000**

HAPs - Organics

Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	1.355E-04	7.744E-05	4.840E-03	1.162E-01	2.194E-04

HAPs - Metals

Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	3.227E-05	7.099E-05	9.035E-05	2.452E-05	1.355E-04

Methodology is the same as page 2 of 7 of TSD, Appendix A.

The five highest organic and metal HAPs emission factors are provided above.  
Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Appendix A: Emission Calculations  
VOC and Particulate  
From Spray Painting Operations**

Company Name: Covermaster, Inc.  
Address City IN Zip: 57784 C.R. 3, Elkhart, Indiana 46517  
Part 70 No.: T039-7354-00137  
Reviewer: Michael Hirtler / EVP  
Date: September 2000

Potential Uncontrolled Emissions:																		
Coating Material	Type of Product Being Coated	Density (Lb/Gal)	Weight % Volatile (H2O& Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential ton/yr	lb VOC /gal solids	Transfer Efficiency	
<b>Plant #1 - Paint Booth B-6</b>																		
clear	fiberglass	7.88	63.90%	0.00%	63.90%	0.00%	36.00%	0.03966	4.063									
activator		8.33	62.50%	0.00%	62.50%	0.00%	32.50%	0.01322	4.063									
clear & activator as applied		7.99	63.54%	0.00%	63.54%	0.00%	35.13%	0.05287	4.063	5.08	5.08	1.09	26.18	4.78	0.69	10.84	75%	
binder		7.78	66.10%	0.00%	66.10%	0.00%	33.80%	0.04140	8.125									
chroma one		7.14	100.00%	0.00%	100.00%	0.00%	0.00%	0.01380	8.125									
binder & chroma one as applied		7.62	74.05%	0.00%	74.05%	0.00%	25.35%	0.05520	8.125	5.64	5.64	2.53	60.71	11.08	0.97	16.68	75%	
base maker		7.74	76.80%	0.00%	76.80%	0.00%	16.90%	0.06993	8.125									
tint		8.79	53.80%	0.00%	53.80%	0.00%	33.60%	0.02331	8.125									
base maker & tint as applied		8.00	70.48%	0.00%	70.48%	0.00%	21.08%	0.09324	8.125	5.64	5.64	4.27	102.50	18.71	1.96	20.06	75%	
clear		8.26	61.90%	0.00%	61.90%	0.00%	38.00%	0.04053	4.063									
activator		8.19	61.90%	0.00%	61.90%	0.00%	32.00%	0.01351	4.063									
clear & activator as applied		8.24	61.90%	0.00%	61.90%	0.00%	36.50%	0.05404	4.063	5.10	5.10	1.12	26.88	4.91	0.75	10.48	75%	
thinner		8.33	100.00%	0.00%	100.00%	0.00%	0.00%	0.00338	8.125	8.33	8.33	0.23	5.49	1.00	0.00	ERR	100%	
<b>Potential Uncontrolled Emissions (tons/year) for Plant #1 Paint Booth B-6 (worst coating plus thinner):</b>												<b>4.50</b>	<b>107.99</b>	<b>19.71</b>	<b>1.96</b>			
<b>Plant #2 - Paint Booth</b>																		
7600S	fiberglass	7.88	63.90%	0.00%	63.90%	0.00%	36.00%	0.16200	8.125	5.04	5.04	6.63	159.07	29.03	4.10	10.49	75%	
7020G		7.78	66.10%	0.00%	66.10%	0.00%	33.80%	0.13980	8.125	5.14	5.14	5.84	140.19	25.59	3.28	11.41	75%	
7185S		7.74	76.80%	0.00%	76.80%	0.00%	16.90%	0.23400	8.125	5.94	5.94	11.30	271.24	49.50	3.74	26.38	75%	
580S		8.26	61.90%	0.00%	61.90%	0.00%	38.00%	0.36000	8.125	5.11	5.11	14.96	358.93	65.50	10.08	10.09	75%	
thinner		6.80	100.00%	0.00%	100.00%	0.00%	0.00%	0.01000	8.125	6.80	6.80	0.55	13.26	2.42	0.00	ERR	100%	
<b>Potential Uncontrolled Emissions (tons/year) for Plant #2 Paint Booth (worst coating plus thinner):</b>												<b>15.51</b>	<b>372.19</b>	<b>67.92</b>	<b>10.08</b>			
										<b>Input Usage Limitation</b>	<b>Control Efficiency</b>	<b>Controlled VOC lbs per Hour</b>	<b>Controlled VOC lbs per Day</b>	<b>Controlled VOC tons per Year</b>	<b>Controlled PM tons/yr</b>			
										<b>VOC</b>	<b>PM</b>							
<b>Total Controlled Potential to Emit (tons/year) for Plant #1: *</b>										33.04%	98.00%	31.51	756.16	138.00	0.03			
<b>Total Controlled Potential to Emit (tons/year) for Plant #2: **</b>										48.14%	98.00%	21.76	522.19	95.30	0.10			
<b>Total Controlled Potential to Emit (tons/year) for Plant #1 &amp; 2:</b>												53.26	1278.36	233.30	0.13			

**Methodology:**

\* Pursuant to CP 039-4510-00137, issued October 11, 1995, total VOC input usage to Plant #1 Booths B-1, B-2, B-5 & B-6 shall be limited to 33% of potential input usage, based on 8,760 hours per year operation such that the potential to emit (PTE) VOC from resin/gel coat applications, plus spray painting, shall be limited to 138.0 tons per year, per twelve (12) consecutive months. Compliance with this limit shall satisfy 326 IAC 8-1-6, BACT.

\*\* Pursuant to CP 039-9337-00137, issued July 15, 1998, total VOC input usage to the Plant #2 paint booth, mold production booths, chop booth, & gel coat booth shall be limited to 48.1% of potential input usage, based on 8,760 hours per year operation, such that the potential to emit (PTE) shall be less than 95.3 tons per twelve (12) consecutive months. Compliance with this limit shall satisfy 326 IAC 8-1-6, BACT.

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) NOTE: COATING MATERIALS ARE APPLIED AT EACH BOOTH ON A MUTUALLY EXCLUSIVE BASIS

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 Uncontrolled Potential Emissions = Worst Case Coating + all Solvents Applied

Controlled VOC Emission Rate = Uncontrolled Emission Rate \* VOC Input Limitation

Controlled PM Emission Rate = Uncontrolled Emission Rate \* VOC Input Limitation \* (1 - PM Control Efficiency)

**Appendix A: Emissions Calculations  
Form DD: Reinforced Plastics and Composites  
Fiberglass Processes at Plant #1**

Company Name: **Covermaster, Inc.**  
Address City IN Zip: **57784 C.R. 3, Elkhart, Indiana 46517**  
Part 70 No.: **T039-7354-00137**  
Reviewer: **Michael Hirtler / EVP**  
Date: **September 2000**

Uncontrolled Potential to Emit: *											
Material (as applied)	Density (Lb/Gal)	Weight % VOC or Styrene Monomer in Resin/Gel	Emission Factor lb styrene per ton gelcoat/resin processed	Gal of Mat (gal/unit)	Maximum (unit/hour)	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
<i>Gel Coat Booth B-2 (Air-Assisted Airless (HVL) Spray Applicators - Uncontrolled)</i>											
gel coat	10.00	33.00%	294	1.3110	8.125	15.66	375.80	68.58	78.15	n/a	75%
catalyst	8.00	76.70%	n/a	0.1152	8.125	5.74	137.84	25.16	1.91	n/a	75%
mold releasing agent	7.10	85.00%	n/a	0.0057	8.125	0.28	6.71	1.22	0.05	n/a	75%
<i>Chop Coat Booth B-1 (Airless Chop Spray Applicators - Uncontrolled Non-Vapor Suppressed)</i>											
fiberglass chop resin	9.10	45.90%	295.6	5.1060	8.125	55.80	1339.16	244.40	223.64	n/a	75%
<i>Mold Construction/Rail Assembly Booth B-5 (1 Air-Assisted Airless Chop Spray Applicator - Uncontrolled Non-Vapor Suppressed)</i>											
resin	9.17	35.50%	147.00	49.0000	0.0014	0.05	1.11	0.20	0.44	n/a	75%
catalyst	9.75	88.00%	n/a	2.0000	0.0014	0.02	0.58	0.11	0.00	n/a	75%
resin	9.17	35.50%	147.00	0.4500	8.125	2.46	59.14	10.79	23.68	n/a	75%
catalyst	9.75	88.00%	n/a	0.0225	8.125	1.57	37.64	6.87	0.23	n/a	75%
<i>Solvent Usage in Gel Coat/Chop/Mold Areas</i>											
Xylene	6.70	100.00%	n/a	0.0042	8.125	0.23	5.46	1.00	0.00	n/a	100%
Thinner	6.80	100.00%	n/a	0.1637	8.125	9.04	217.07	39.61	0.00	n/a	100%
<b>Total Uncontrolled Potential to Emit for Plant #1 B-1, B-2, B-5 &amp; solvent (tons per year):</b>						<b>90.85</b>	<b>2180.50</b>	<b>397.94</b>	<b>328.12</b>		
<b>Total Controlled Plant #1 Potential to Emit (tons per year): **</b>				<b>33.04%</b>	<b>98.00%</b>	<b>31.51</b>	<b>756.16</b>	<b>138.00</b>	<b>2.17</b>		

Methodology:

\* Emission calculations derived from Technical Support Document Appendices A & B Emission Calculations for CP 039-4510-00137, issued October 11, 1995.

\*\* Pursuant to CP 039-4510-00137, issued October 11, 1995, total VOC input usage to Plant #1 Booths B-1, B-2, B-5 & B-6 shall be limited to 33% of potential input usage, based on 8,760 hours per year operation in order to such that the potential to emit (PTE) VOC from resin/gel coat applications, plus spray painting, shall be limited to 138.0 tons per year, per twelve (12) consecutive months. Compliance with this limit shall satisfy 326 IAC 8-1-6, BACT.

Potential VOC Pounds per Hour = Density of coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* Emission Factor  
 Potential VOC Pounds per Day = Density of coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (24 hr/day) \* Emission Factor  
 Potential VOC Tons per Year = 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 the coatings + all solvents used (acetone is used as a clean-up solvent, but as a non-photochemically reactive organic compound, it is not included in the VOC emission rate)  
 Controlled emission rate = uncontrolled emission rate \* Input Usage Limitation (expressed as percent of potential input)  
 Resin/gel coat emission factors are from the Unified Emission Factors for Open Molding of Composites, developed by the CFA for the Reinforced Plastics Industries, April, 1999.

**Appendix A: Emissions Calculations**  
**Form DD: Reinforced Plastics and Composites**  
**Fiberglass Processes at Plant #2**

**Company Name: Covermaster, Inc.**  
**Address City IN Zip: 57784 C.R. 3, Elkhart, Indiana 46517**  
**Part 70 No.: T039-7354-00137**  
**Reviewer: Michael Hirtler / EVP**  
**Date: September 2000**

Uncontrolled Potential to Emit: *											
Material (as applied)	Density (Lb/Gal)	Weight % Monomer (as styrene) in Gel/Resin or VOC for non- Resin/Gel	Emission Factor lb styrene per ton gelcoat/ resin processed	Gal of Mat (gal/unit)	Maximum (unit/hour)	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
<i>Truck Cap Production w/One Gel Coat Booth &amp; One Resin Booth (Three HVLP Gel Coat Spray Guns &amp; One Flow Coater Chop Gun - Uncontrolled Non-Vapor Suppressed)</i>											
resin	9.16	39.20%	89.80	2.4000	8.125	8.02	192.48	35.13	0.00	n/a	100%
catalyst	9.00	88.00%	n/a	0.1200	8.125	7.72	185.33	33.82	1.15	n/a	75%
gel coat	9.99	38.00%	398.00	0.2000	8.125	3.23	77.53	14.15	11.02	n/a	75%
mold release	7.24	100.00%	n/a	0.0132	8.125	0.78	18.64	3.40	0.00	n/a	75%
<i>Mold Construction/Repair Area - Three (3) Booths (Two HVLP Gel Coat Spray Guns &amp; One Flow Coater Chop Gun - Uncontrolled Non-Vapor Suppressed)</i>											
resin	9.17	40.00%	93.00	5.1600	0.036	0.08	1.89	0.34	0.00	n/a	100%
catalyst	9.00	88.00%	n/a	0.1200	0.036	0.03	0.81	0.15	0.01	n/a	75%
gel coat	10.80	25.00%	222.50	1.3100	0.036	0.06	1.35	0.25	0.41	n/a	75%
mold release	7.24	100.00%	n/a	0.0692	0.036	0.02	0.43	0.08	0.00	n/a	75%
<i>Solvent Usage in Gel Coat/Chop/Mold Areas</i>											
Thinner	6.80	100.00%	n/a	0.0034	0.036	0.00	0.02	0.00	0.00	n/a	100%
<b>Total Uncontrolled Potential to Emit Plant #2 Resin/Gel/Mold Booths &amp; Solvent (tons per yr):</b>						<b>19.94</b>	<b>478.47</b>	<b>87.32</b>	<b>12.59</b>		
				Input Usage Limitation VOC	Control Efficiency PM	Controlled VOC lbs per Hour	Controlled VOC lbs per Day	Controlled VOC tons per Year	Controlled PM tons/yr		
<b>Total Controlled Potential to Emit Plant #2 (tons per year): **</b>				<b>61.39%</b>	<b>98.00%</b>	<b>21.76</b>	<b>522.19</b>	<b>95.30</b>	<b>0.69</b>		

## Methodology:

\* Emission calculations derived from Technical Support Document, Appendix A - Emission Calculations, to CP 039-9337-00137, issued July 15, 1998.

\*\* Includes Plant #2 paint booth VOC emissions (67.92 tons per year). Pursuant to CP 039-9337-00137, issued July 15, 1998, total VOC input usage to the Plant #2 paint booth, mold production booths, chop booth, & gel coat booth shall be limited to 61.4% of potential input usage, based on 8,760 hours per year operation, such that the potential to emit (PTE) VOC from resin/gel coat applications, plus spray painting, shall be less than 95.3 tons per 12 consecutive months. Also, total resin and gel coat usage shall be limited such that the PTE volatile organic HAP shall be less than 95.3 tons per 12 consecutive month period. Compliance with these limits shall satisfy 326 IAC 8-1-6, BACT, and 326 IAC 2-4.1-1, New Source Toxics Control.

Potential VOC Pounds per Hour = Density of coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* Emission Factor

Potential VOC Pounds per Day = Density of coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (24 hr/day) \* Emission Factor

Potential VOC Tons per Year = 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 the coatings + all solvents used (acetone is used as a clean-up solvent, but as a non-photochemically reactive organic compound, it is not included in the VOC emission rate)

Controlled VOC Tons per Year = Uncontrolled VOC (tons per year) \* Input Usage Limitation (as % of potential input)

Controlled PM Tons per Year = Uncontrolled PM (tons per year) \* Input Usage Limitation (as % of potential input) \* Control Efficiency (98% applies only to resin use at Truck Cap Production)

Resin/gel coat emission factors are from the Unified Emission Factors for Open Molding of Composites, developed by the CFA for the Reinforced Plastics Industries, April, 1999.

**Appendix A: Hazardous Air Pollutant (HAP)  
Emission Calculations From Surface Coating Operations**

Company Name: Covermaster, Inc.  
Address City IN Zip: 57784 C.R. 3, Elkhart, Indiana 46517  
Part 70 No.: T039-7354-00137  
Reviewer: Michael Hirtler / EVP  
Date: September 2000

Material	Density (Lb/Gal)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Weight % MEK	Weight % MIBK	Weight % toluene	Weight % xylene	Weight % glycol ethers	Weight % methanol	Weight % styrene emitted	Weight % dimethyl phalate	Weight % ethyl benzene	HAP EMISSION RATES (TONS PER YEAR)																								
													MEK	MIBK	toluene	xylene	glycol ethers	methanol	styrene emitted	dimethyl phalate	ethyl benzene	Total All HAPs															
<i>Plant # 1: *</i>																																					
<i>Chop Coat Booth B-1, Gel Coat Booth B-2, &amp; Mold Construction/Rail Assembly Booth B-5:</i>													0.00	0.00	0.00	0.00	0.00	0.00	323.97	15.26	0.00	339.23															
<i>Paint Spray Booth B-6:</i>													3.51	2.05	5.27	7.32	0.00	0.00	0.00	0.00	0.00	18.15															
<i>Plant # 2: **</i>																																					
<i>Paint Spray Booth</i>																																					
7600S	7.88	0.16200	8.125	12.00%	7.00%	18.00%	25.00%	0.00%	0.00%	0.00%	0.00%	0.00%	5.45	3.18	8.18	11.36	0.00	0.00	0.00	0.00	0.00	0.00	28.17														
7020G	7.78	0.13980	8.125	1.00%	0.00%	0.00%	13.00%	1.00%	0.00%	0.00%	0.00%	0.00%	0.39	0.00	0.00	5.03	0.39	0.00	0.00	0.00	0.00	5.81															
7185S	7.74	0.23400	8.125	0.00%	5.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	3.22	0.00	0.00	0.00	0.00	0.00	0.00	0.00	3.22															
580S	8.26	0.36000	8.125	0.00%	0.00%	8.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	8.47	0.00	0.00	0.00	0.00	0.00	0.00	8.47															
thinner	6.80	0.01000	8.125	10.00%	10.00%	60.00%	0.00%	0.00%	10.00%	0.00%	0.00%	0.00%	0.24	0.24	1.45	0.00	0.00	0.24	0.00	0.00	0.00	2.18															
<i>Truck Cap Production w/One Gel Coat Booth &amp; One Resin Booth</i>																																					
resin	9.16	2.4000	8.125	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	4.49%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	35.13	0.00	0.00	35.13														
catalyst	9.00	0.1200	8.125	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	35.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	13.45	0.00	13.45														
gel coat	9.99	0.2000	8.125	5.00%	0.00%	0.00%	0.00%	0.00%	0.00%	19.90%	0.00%	0.00%	3.56	0.00	0.00	0.00	0.00	0.00	0.00	14.15	0.00	0.00	17.70														
mold release	7.24	0.0132	8.125	0.00%	0.00%	70.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	2.38	0.00	0.00	0.00	0.00	0.00	0.00	2.38															
<i>Mold Construction/Repair Area - Three (3) Booths</i>																																					
resin	9.17	5.1600	0.036	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	4.65%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.35	0.00	0.00	0.35														
catalyst	9.00	0.1200	0.036	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	35.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.06	0.00	0.06														
gel coat	10.80	1.3100	0.036	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	11.13%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.25	0.00	0.00	0.25															
mold release	7.24	0.0692	0.036	0.00%	0.00%	70.00%	0.00%	0.00%	0.00%	0.00%	35.00%	0.00%	0.00	0.00	0.06	0.00	0.00	0.00	0.00	0.03	0.00	0.08															
<i>Solvent Usage in Gel Coat/Chop/Mold Areas</i>																																					
Thinner	6.80	0.0034	0.036	10.00%	10.00%	60.00%	0.00%	0.00%	10.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00															
Total Uncontrolled Potential to Emit (tons per year):																																					
													Plant #1 (tons per year):	3.51	2.05	5.27	7.32	0.00	0.00	323.97	15.26	0.00	357.38														
													Plant #2 (tons per year):	9.25	3.47	12.36	11.36	0.39	0.24	49.87	13.54	0.00	99.75														
													Total Source (tons per year):	12.76	5.51	17.63	18.68	0.39	0.24	373.84	28.80	0.00	457.13														
Total Limited Potential to Emit (tons per year): ***																																					
													Plant #1 (tons per year):																							<= 138.0	
													Plant #2 (tons per year):																								< 95.3
													Total Source (tons per year):																								< 233.3

**METHODOLOGY**

\* Emissions data based on Technical Support Document Appendices A & B Emission Calculations for CP 039-4510-00137, issued October 11, 1995. Styrene emissions reflect emission factors for resin/gel coat usage found in the Unified Emission Factors for Open Molding of Composites, developed by the CFA for the Reinforced Plastics Industries, April, 1999.

\*\* Emissions data based on Technical Support Document Appendix A Emission Calculations for CP 039-9337-00137, issued July 15, 1998. Styrene emissions reflect emission factors for resin/gel coat usage found in the Unified Emission Factors for Open Molding of Composites, developed by the CFA for the Reinforced Plastics Industries, April, 1999.

\*\*\* Pursuant to CP 039-4510 (Plant #1), VOC input usage to the chop booth (B-1), gel booth (B-2), paint booth (B-6) and mold booth (B-5) will be limited to 138.0 tons per 12 consecutive month period to satisfy 326 IAC 8-1-6, BACT. Compliance with this limit will coincidentally reduce HAP emissions to 138.0 tons per 12 consecutive month period. Pursuant to CP 039-9337 (Plant #2), VOC input usage to the paint booth, mold production booths, chop booth, & gel coat booth will be less than 95.3 tons per 12 consecutive month period to satisfy 326 IAC 8-1-6, BACT for VOC; and resin & gel coat usage shall be limited such that PTE volatile organic HAP will be less than 95.3 tons per 12 consecutive month period to satisfy 326 IAC 2-4.1-1, New Source Toxics Control, for HAP emissions.