

**FEDERALLY ENFORCEABLE STATE  
OPERATING PERMIT (FESOP)  
OFFICE OF AIR MANAGEMENT**

**Dylan Designs  
1701 Sterling Avenue  
Elkhart, Indiana 46515**

(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 2-8 and 326 IAC 2-1-3.2, as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F039-7355-00291	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

## SECTION A SOURCE SUMMARY

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

### A.1 General Information [326 IAC 2-8-3(b)]

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The Permittee owns and operates a fiberglass components manufacturing plant.

Responsible Official: Mike Stankovich  
Source Address: 1701 Sterling Avenue, Elkhart, Indiana, 46515  
Mailing Address: P.O. Box 936 - 1701 Sterling Avenue, Elkhart, Indiana, 46515  
SIC Code: 3089  
County Location: Elkhart  
County Status: Attainment for all criteria pollutants  
Source Status: Federally Enforceable State Operating Permit (FESOP)  
Minor Source, under PSD Rules

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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

- (1) One (1) gel coat gun, identified as Booth 1, with a maximum capacity throughput of 2.0 pounds per hour, using dry filters as overspray control, and exhausting to stack S-1.
- (2) One (1) chop coat gun, identified as Booth 2, with a maximum capacity throughput of 17.5 pounds per hour of resin, using dry filters as overspray control, and exhausting to stack S-2.

### A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

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

- (3) One (1) mold prep area, with a maximum capacity throughput of 0.075 pounds per hour of wax.
- (4) One (1) stripper, with a maximum capacity throughput of 0.013 pounds per hour.
- (5) One (1) equipment cleaner, with a maximum capacity throughput of 1.2 pounds per hour of acetone and 0.53 pounds per hour of Dibasic ester.
- (6) One (1) mold build area, with a maximum capacity throughput of 0.53 pounds per hour of tool resin.
- (7) Two (2) natural gas fired heaters, each rated at 0.30 million Btu per hour, identified as H-1 and H-2, each exhausting at one (1) stack, identified as S-3 and S-4, respectively.
- (8) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.

- (9) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.
- (10) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
- (11) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (12) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (13) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals measured at 38 °C.)

**A.4 FESOP Applicability [326 IAC 2-8-2]**

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This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) for a Federally Enforceable State Operating Permit (FESOP).

**SECTION B GENERAL CONDITIONS**

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

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Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

**B.2 Definitions [326 IAC 2-8-1]**

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

**B.3 Permit Term [326 IAC 2-8-4(2)]**

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

**B.4 Enforceability [326 IAC 2-8-6]**

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

**B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]**

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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 2-8-3(h) and 326 IAC 2-8-9.

**B.6 Severability [326 IAC 2-8-4(4)]**

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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.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]**

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

**B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)]**

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

- (b) The Permittee shall furnish to IDEM, OAM, within a reasonable time, any information that IDEM, OAM, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.
- (c) Upon request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAM, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

**B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]**

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IDEM, OAM may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

**B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]**

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- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit constitutes a violation of the Clean Air Act and is grounds for:
- (1) Enforcement action;
  - (2) Permit termination, revocation and reissuance, or modification; and
  - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

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

B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

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

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

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
  - (1) The identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was based on continuous or intermittent data;
  - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
  - (5) Such other facts as specified in Sections D of this permit, IDEM, OAM, may require to determine the compliance status of the source.

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).

B.13 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

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

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM.

**B.14 Emergency Provisions [326 IAC 2-8-12]**

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- (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 2-8-12.
- (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 describes the following:
  - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;
  - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
  - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Management, Compliance Section) or,  
Telephone No.: 317-233-5674 (ask for Compliance Section)  
Facsimile No.: 317-233-5967

Failure to notify IDEM, OAM, by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency, or after the emergency is discovered or reasonably should have been discovered, shall constitute a violation of 326 IAC 2-8 and any other applicable rules. [326 IAC 2-8-12(f)]

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

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

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

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

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

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAM, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAM, by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 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 material of substantial economic value.

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

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

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

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

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

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
  - (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
  - (2) An emergency as defined in 326 IAC 2-7-1(12); or
  - (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
  - (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

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

- (c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

**B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination**

~~[326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]~~

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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 FESOP 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 2-8-4(5)(C)]
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM determines any of the following:
  - (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAM, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

**B.17 Permit Renewal [326 IAC 2-8-3(h)]**

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40).

Request for renewal shall be submitted to:

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

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]
- (1) A timely renewal application is one that is:
- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due. [326 IAC 2-5-3]
- (2) If IDEM, OAM upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-8-9]  
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 2-8 until IDEM, OAM takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAM, any additional information identified as needed to process the application.

**B.18 Permit Amendment or Modification [326 IAC 2-8-10] [326 IAC 2-8-11]**

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- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:
- Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015
- Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule.
- (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request.  
[326 IAC 2-8-10(b)(3)]

**B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-8-11(b)(2)]**

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Notwithstanding 326 IAC 2-8-11(b)(1)(D)(i) and 326 IAC 2-8-11(c)(1), minor permit modification procedures may be used for modifications of this permit involving the use of economic incentives, marketable permits, emissions trading, and other similar approaches to the extent that such minor permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated by U.S. EPA.

B.20 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-8-15(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 2-8-15(a) and the following additional condition:

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

B.21 Operational Flexibility [326 IAC 2-8-15]

(a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:

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

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

and

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

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

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAM, in the notices specified in 326 IAC 2-8-15(b), (c)(1), and (d).

- (b) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

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

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

- (c) Emission Trades [326 IAC 2-8-15(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 2-8-15(c).
- (d) Alternative Operating Scenarios [326 IAC 2-8-15(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 2-8-4(7). No prior notification of IDEM, OAM or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.22 Construction Permit Requirement [326 IAC 2]

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

B.23 Inspection and Entry [326 IAC 2-8-5(a)(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.  
[326 IAC 2-8-5(a)(4)]

- (1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM, or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAM, nor an authorized representative, may disclose the information unless and until IDEM, OAM, makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]
- (2) The Permittee, and IDEM, OAM, acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

B.24 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-8-10]

Pursuant to 326 IAC 2-1-6 and 2-8-10:

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch, within thirty (30) days of the change. Notification shall include a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current Permittee and the new owner.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-8-10. The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) IDEM, OAM shall reserve the right to issue a new permit.

B.27 Annual Fee Payment [326 IAC 2-8-4(6)] [326 IAC 2-8-16]

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

B.26 Credible Evidence [326 IAC 2-8-4(3)][62 Federal Register 8313][326 IAC 2-8-5]

Notwithstanding the conditions of this permit specifying practices for applicable requirements, other credible evidence may also be used to establish compliance or noncompliance with applicable requirements.

## SECTION C SOURCE OPERATION CONDITIONS

Entire Source

### Emissions Limitations and Standards [326 IAC 2-8-4(1)]

#### C.1 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

- (a) Pursuant to 326 IAC 2-8:
- (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per three hundred sixty-five (365) consecutive day period. This limitation shall also satisfy the requirements of 326 IAC 2-3 (Emission Offset);
  - (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per three hundred sixty-five (365) consecutive day period; and
  - (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per three hundred sixty-five (365) consecutive day period.
- (b) Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), emissions of particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per three hundred sixty-five (365) consecutive day period.
- (c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided the source's potential to emit does not exceed the above specified limits.
- (d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

#### C.2 Opacity [326 IAC 5-1]

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

- (a) Visible emissions shall not exceed an average of forty percent (40%) opacity in twenty-four (24) consecutive readings as determined by 326 IAC 5-1-4,
- (b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

#### 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(3)]

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

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

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

C.6 Operation of Equipment [326 IAC 2-8-5(a)(4)]

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

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

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

All required notifications shall be submitted to:

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

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

- (e) **Procedures for Asbestos Emission Control**  
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Indiana Accredited Asbestos Inspector**  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

### **Testing Requirements [326 IAC 2-8-4(3)]**

#### **C.8 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 methods approved by the IDEM, OAM.

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

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

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

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

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

### **Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

#### **C.9 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]**

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

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

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

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

**C.10 Monitoring Methods [326 IAC 3]**

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

**Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

**C.11 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]**

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

- (a) Submit:
  - (1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
  - (2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
  - (3) A verification to IDEM, OAM, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.
- (b) Provide annual certification to IDEM, OAM, that the Risk Management Plan is being properly implemented.

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

**C.12 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC2-8-5]**

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

- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

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

### **Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]**

#### C.13 Emission Statement [326 IAC 2-6] [326 IAC 2-8-4(3)]

- (a) The Permittee shall submit a certified, annual emission statement that meets the requirements of 326 IAC 2-6 (Emission Reporting). This annual statement must be received by April 15 of each year and must comply with the minimum requirements 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). The annual statement must be submitted to:

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

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

#### C.14 Monitoring Data Availability

- (a) With the exception of performance tests conducted in accordance with Section C- Performance Testing all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.

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

C.15 General Record Keeping Requirements [326 IAC 2-8-4(3)][326 IAC 2-8-5]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM representative, 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 written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
  - (1) The date, place, and time of sampling or measurements;
  - (2) The dates analyses were performed;
  - (3) The company or entity performing the analyses;
  - (4) The analytic techniques or methods used;
  - (5) The results of such analyses; and
  - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
  - (1) Copies of all reports required by this permit;
  - (2) All original strip chart recordings for continuous monitoring instrumentation;
  - (3) All calibration and maintenance records;
  - (4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.16 General Reporting Requirements [326 IAC 2-8-4(3)(C)]

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

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

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

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period.
- (e) All instances of deviations as described in Section B-Deviations from Permit Requirement Conditions must be clearly identified in such reports.
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

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

C.17 Compliance with 40 CFR 82 and 326 IAC 22-1

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

- (a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156
- (b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

## SECTION D.1 FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-8-4(10)]

- (1) One (1) gel coat gun, identified as Booth 1, with a maximum capacity throughput of 2.0 pounds per hour, using dry filters as overspray control, and exhausting to stack S-1.
- (2) One (1) chop coat gun, identified as Booth 2, with a maximum capacity throughput of 17.5 pounds per hour of resin, using dry filters as overspray control, and exhausting to stack S-2.

### Emission Limitations and Standards [326 IAC 2-8-4(1)]

#### D.1.1 Hazardous Air Pollutants (HAPs) [326 IAC 2-8-4(1)]

These facilities shall limit HAP and VOC usage, including coatings, solvents, and resin materials, to the following levels:

- (a) These facilities shall use no more than 9.9 tons of any single HAP per twelve (12) consecutive month period, and no more than 24 tons of any combination of HAPS per twelve (12) consecutive month period. This HAP usage limit is required to limit the potential to emit HAPs to less than the Part 70 significant levels.
- (b) These facilities shall use no more than 99 tons of VOC per twelve (12) consecutive month period. By limiting any single HAP usage to 9.9 tons per year, the potential to emit VOC is limited to less than 99 tons per twelve (12) consecutive month period based on a HAP content of approximately 90%. This VOC usage limit is required to limit the potential to emit VOCs to less than 99 tons per twelve (12) consecutive month period when HAP content is less than 90%.

Compliance with these limits makes 326 IAC 2-7 (Part 70) not applicable.

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

The PM from the two (2) booths (1 and 2) shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

#### D.1.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

### Compliance Determination Requirements

#### D.1.4 Testing Requirements [326 IAC 2-8-5(a)(1)(4)]

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

#### D.1.5 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.1.1 shall be determined using formulation data supplied by the coating manufacturer. IDEM, OAM reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

### **Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

#### D.1.6 Particulate Matter (PM)

The dry filters for PM control shall be in operation at all times when the two (2) booths (1, and 2) are in operation.

#### D.1.7 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, daily observations shall be made of the overspray while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Weekly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an overspray emission, evidence of overspray emission, or other abnormal emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

### **Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

#### D.1.8 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1.
  - (1) The quantity and the VOC and HAPs content of each material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used;
  - (2) A log of the dates of use;
  - (3) The volume weighted VOC and HAP content of the materials used for each month;
  - (4) The cleanup solvent, VOC, and HAP usage for each month;
  - (5) The total VOC and HAP usage for each month; and

- (6) The weight of VOCs and HAPs emitted for each compliance period.
- (b) To document compliance with Condition D.1.6 and D.1.7, the Permittee shall maintain a log of daily overspray observations, daily and weekly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.1.9 Reporting Requirements

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

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

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
CERTIFICATION**

Source Name: Dylan Designs  
Source Address: 1701 Sterling Avenue, Elkhart, IN 46515  
Mailing Address: P.O. Box 936 - 1701 Sterling Avenue, Elkhart, IN 46515  
FESOP No.: F039-7355-00291

**This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.**

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) \_\_\_\_\_
- 9 Report (specify) \_\_\_\_\_
- 9 Notification (specify) \_\_\_\_\_
- 9 Other (specify) \_\_\_\_\_

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

Signature:

Printed Name:

Title/Position:

Date:

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

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
EMERGENCY/DEVIATION OCCURRENCE REPORT**

Source Name: Dylan Designs  
Source Address: 1701 Sterling Avenue, Elkhart, IN 46515  
Mailing Address: P.O. Box 936 - 1701 Sterling Avenue, Elkhart, IN 46515  
FESOP No.: F039-7355-00291

**This form consists of 2 pages**

**Page 1 of 2**

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

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

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

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

**Page 2 of 2**

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

Form Completed by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

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

**FESOP Quarterly Report**

Source Name: Dylan Designs  
Source Address: 1701 Sterling Avenue, Elkhart, IN 46515  
Mailing Address: P.O. Box 936 - 1701 Sterling Avenue, Elkhart, IN 46515  
FESOP No.: F039-7355-00291  
Facility: Booths 1 and 2  
Parameter: Single HAP Usage limit to 9.4 tons per twelve (12) consecutive months.  
Total HAPs Usage limit to 24.0 tons per twelve (12) consecutive months.  
VOC Usage limit to 99.0 tons per twelve (12) consecutive months.

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

Material	Usage (tons)	Usage (tons)	Usage (tons)
	Previous 11 months	This Month	12 Month Totals
Single HAP			
Total HAPs			
VOCs			

- 9 No deviation occurred in this quarter.
- 9 Deviation/s occurred in this quarter.  
Deviation has been reported on: \_\_\_\_\_

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

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

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
 QUARTERLY COMPLIANCE MONITORING REPORT**

Source Name: Dylan Designs  
 Source Address: 1701 Sterling Avenue, Elkhart, IN 46515  
 Mailing Address: P.O. Box 936 - 1701 Sterling Avenue, Elkhart, IN 46515  
 FESOP No.: F039-7355-00291

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

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

**9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD**

**9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.**

Requirement (eg. Permit Condition D.1.3)	Number of Deviations	Date of each Deviation

Form Completed By: \_\_\_\_\_  
 Title/Position: \_\_\_\_\_  
 Date: \_\_\_\_\_  
 Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

## Indiana Department of Environmental Management Office of Air Management

### Technical Support Document (TSD) for a Federally Enforceable State Operating Permit (FESOP)

#### Source Background And Description

**Source Name:** Dylan Designs  
**Source Location:** 1701 Sterling Avenue, Elkhart, IN 46515  
**County:** Elkhart  
**SIC Code:** 3089  
**Operation Permit No.:** F039-7355-00291  
**Permit Reviewer:** Richard Moore/EVP

The Office of Air Management (OAM) has reviewed a Federally Enforceable State Operating Permit (FESOP) application from Dylan Designs relating to the operation of a fiberglass components manufacturing plant.

#### Permitted Emission Units and Pollution Control Equipment

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

- (1) One (1) gel coat gun, identified as Booth 1, with a maximum capacity throughput of 2.0 pounds per hour, using dry filters as overspray control, and exhausting to stack S-1.
- (2) One (1) chop coat gun, identified as Booth 2, with a maximum capacity throughput of 17.5 pounds per hour of resin, using dry filters as overspray control, and exhausting to stack S-2.

#### Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

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

There are no new facilities to be reviewed under the ENSR process.

#### Insignificant Activities

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

- (3) One (1) mold prep area, with a maximum capacity throughput of 0.075 pounds per hour of wax.
- (4) One (1) stripper, with a maximum capacity throughput of 0.013 pounds per hour.
- (5) One (1) equipment cleaner, with a maximum capacity throughput of 1.2 pounds per hour of acetone and 0.53 pounds per hour of Dibasic ester.

- (6) One (1) mold build area, with a maximum capacity throughput of 0.53 pounds per hour of tool resin.
- (7) Two (2) natural gas fired heaters, each rated at 0.30 million Btu per hour, identified as H-1 and H-2, each exhausting at one (1) stack, identified as S-3 and S-4, respectively.
- (8) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.
- (9) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.
- (10) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
- (11) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (12) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (13) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals measured at 38 °C.)

### **Existing Approvals**

This source has been operating under the following approval:

- (1) CP039-4171, issued on December 5, 1994.

This one approval specified facilities that were considered registered.

### **Enforcement Issue**

There are no Enforcement actions pending.

### **Recommendation**

The staff recommends to the Commissioner that the FESOP 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 incomplete FESOP application for the purposes of this review was received on December 4, 1996. Additional information received on August 11, 1997, October 8, 1997, December 12, 1997, and December 16, 1997 makes the FESOP application administratively complete.

## Emissions Calculations

See Appendix A: Emissions Calculations for detailed calculations on pages 1 through 5 in Appendix A.

## Potential Emissions

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

Pollutant	Potential Emissions (tons/year)
PM	569.76
PM-10	0.03
SO <sub>2</sub>	0.00
VOC	184.74
CO	0.06
NO <sub>x</sub>	0.26

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

These emissions were calculated using the updated Reinforced Plastics and Composites Flash Off Factor Determination methodology. See attached spreadsheets for detailed calculations on page 1 and page 5 in Appendix A.

HAP	Potential Emissions (tons/year)
Styrene	176.95
MEK	0.00
Dimethyl Phthalate	0.03
Methyl Methacrylate	7.08
TOTAL	184.07

See attached spreadsheets for detailed calculations on page 2 in Appendix A).

- (a) The potential emissions (as defined in the Indiana Rule) of volatile organic compounds (VOCs) and particulate matter are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential emissions (as defined in Indiana Rule) of any single HAP is equal to or greater than ten (10) tons per year and the potential emissions (as defined in Indiana Rule) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (c) This source, otherwise required to obtain a Title V permit, has agreed to accept a permit with federally enforceable limits that restrict its PTE to below the Title V emission levels. Therefore, this source will be issued a Federally Enforceable State Operating Permit (FESOP), pursuant to 326 IAC 2-8.

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

**Limited Potential To Emit**

- (a) The source has accepted a federally enforceable limit on potential to emit of a single HAP of 9.4 tons per year.
- (b) By limiting a single HAP to 9.4 tons per year, the source has accepted a limit on potential to emit VOCs of 99 tons per year, consisting of:
- (i) 10.6 tons per year for the significant activities [based on condition (a)]; and
  - (ii) 0.02 tons per year for combustion sources and negligible emissions for the other insignificant activities.
- (c) The source has accepted a limit on potential to emit of 24 tons per year for any combination of HAPs (again based on (a) this consists of 9.84 tons per year of HAPs).
- (d) The table below summarizes the total limited potential to emit of the significant and insignificant emission units.

Limited Potential to Emit (tons/year)								
Process/ facility	PM	PM-10	SO <sub>2</sub>	VOC*	CO	NO <sub>x</sub>	Single HAP*	Total HAPs
Booths 1 & 2	5.7	5.7		10.6			9.4	9.84
Insignificant Activities	0.03	0.03	0.00	0.02	0.06	0.26		
<b>Total Emissions</b>	<b>5.73</b>	<b>5.73</b>	<b>0.00</b>	<b>10.62</b>	<b>0.06</b>	<b>0.26</b>	<b>9.4</b>	<b>9.84</b>

\*Limited HAP emissions (and therefore, Limited VOC emissions) are based on material usage of approximately 5.3% of potential usage as provided by applicant. By limited usage to approximately 5.3%, single HAP emissions (and therefore, VOC emissions) are less than Part 70 significant levels.

**County Attainment Status**

The source is located in Elkhart County.

Pollutant	Status
TSP	Attainment
PM-10	Attainment
SO <sub>2</sub>	Attainment
NO <sub>x</sub>	Attainment
Ozone	Maintenance
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen 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.

### **Federal Rule Applicability**

- (a) There are no New Source Performance Standards (326 IAC 12), 40 CFR 60, applicable to this source.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) 40 CFR 63, applicable to this source.

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

#### **326 IAC 2-2 (Prevention of Significant Deterioration)**

This source is not subject to 326 IAC 2-2 (PSD). This rule applies to sources with potential emissions (after any required controls) of any criteria pollutant greater than or equal to 250 tons per year. This source will limit HAP usage such that associated VOC emissions do not exceed 10.6 tons per year.

Both spray booths are required to have dry filters as overspray (PM) control, therefore, the potential emissions of PM after the required control devices is 5.7 tons per year, which is less than the significant level of 250 tons per year. 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 particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability. Therefore, the requirements of 326 IAC 2-2 do not apply.

#### **326 IAC 2-6 (Emission Reporting)**

This source is subject to 326 IAC 2-6 (Emission Reporting), because it emits more than ten (10) tons per year of VOCs 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 2-8-4 (FESOP)**

This source is subject to 326 IAC 2-8-4 (FESOP). By accepting the following limitations the source wide emissions of a single HAP (Styrene) are limited to 9.4 tons per year and by limiting the coating usage for a single HAP the volatile organic compound emissions are limited to 10.62 tons per year, therefore the source satisfies the requirements of 326 IAC 2-8 (FESOP) and is not subject to the requirements of 326 IAC 2-7. Therefore, pursuant to this rule, the following conditions apply:

The two (2) booths shall limit the total coating, hardener, and solvent usage so that styrene emissions are limited to 9.4 tons per twelve (12) month period, rolled on a monthly basis.

**326 IAC 5-1 (Visible Emissions Limitations)**

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

- (a) Visible emissions shall not exceed an average of forty percent (40%) opacity in twenty-four (24) consecutive readings as determined by 326 IAC 5-1-4,
- (b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

**State Rule Applicability - Individual Facilities**

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

Pursuant to 326 IAC 2-1-3.4 (New Source Toxics Control), any new process or production unit, which in and of itself emits or has the potential to emit (PTE) 10 tons per year of any HAP or 25 tons per year of any combination of HAPs, must be controlled using technologies consistent with Maximum Achievable Control Technology (MACT). All facilities at the source were constructed before the rule promulgation date of July 27, 1997, and therefore, are not subject to the requirements of 326 IAC 2-1-3.4.

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

The two (2) booths are subject to 326 IAC 6-3-2 (Particulate Emission Limitations). Pursuant to this rule, the allowable particulate matter (PM) overspray from each spray gun are limited by the following:

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

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

The source will comply with the requirements under 326 IAC 6-3-2 by utilizing dry filters for controlling particulate matter emissions. This limit will also render 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

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

The two (2) booths are not subject to the provisions of 326 IAC 8-1-6. This rule requires all facilities constructed after January 1, 1980, which have potential VOC emission rates of 25 or more tons per year, and which are not otherwise regulated by other provisions of 326 IAC 8, to reduce VOC emissions using Best Available Control Technology (BACT). The source has accepted federally enforceable limits on a single HAP (styrene) of 9.4 tons per year. The VOC emissions are limited because the single HAP accounts for approximately 88% of the VOC emissions. Therefore, the limited potential to emit VOCs from the two booths are 10.6 tons per year, therefore a BACT analysis is not required.

## Compliance Requirements

Permits issued under 326 IAC 2-8 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 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

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

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

The two (2) booths have applicable compliance monitoring conditions as specified below:

- (a) Daily visible emissions notations of the two (2) booths stack exhausts shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.
- (b) The amount of coatings, solvents and resin materials usage limit was based on the quantities listed in the following Table below.

Material	Facility's Code	Pounds	Gallons
Orange Tooling Gel L/F	945YAO58	420	46.5
Flexible Grey Sandable	GP8-5100	6135	595
Black Neo Gelcoat	GG6-5013	2925	311
Premium Clearcoat	ACO0506	6135	702
White Gelcoat	GG1-5260	1980	185

White	GH1-5340	990	92.5
Polyester Resin	40-4385	84650	9375
Hi-Speed Hardener	83025	380	40
Lupersol DHD-9 Red	DHD-9	2040	226
Microcel Body Filler	60079	385	42.5
Laminex	126031	700	77.5

- (c) These facilities shall limit HAP and VOC usage, including coatings, solvents, and resin materials, to the following levels:
- (1) These facilities shall use no more than 9.4 tons of any single HAP per twelve (12) consecutive month period, and no more than 24 tons of any combination of HAPS per twelve (12) consecutive month period.
  - (2) These facilities shall use no more than 99 tons of VOC per twelve (12) consecutive month period. By limiting any single HAP usage to 9.4 tons per year, the potential to emit VOC is limited to less than 99 tons per twelve (12) consecutive month period based on a HAP content of approximately 88%.
- (c) Quarterly reports shall be submitted to the OAM. These reports shall include the type and quantity of each material used per month. The reports shall also include deviations from compliance monitoring criteria, certification that corrective actions were taken, or certification that no deviations occurred during the reporting period.

These monitoring conditions are necessary because the coating usage must be limited and the dry filters for overspray from the operations must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-8 (FESOP).

### **Air Toxic Emissions**

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

- (a) This source has accepted federally enforceable air toxic emission limits of 9.4 tons per year for any single HAP and/or 24 tons per year for any combination of HAPs.

### **Conclusion**

The operation of this fiberglass components manufacturing plant will be subject to the conditions of the attached proposed **FESOP No. F039-7355-00291**.

**Indiana Department of Environmental Management  
Office of Air Management**

Addendum to the  
Technical Support Document for Federally Enforceable State Operating  
Permit (FESOP)

<b>Source Name:</b>	<b>Dylan Designs</b>
<b>Source Location:</b>	<b>1701 Sterling Avenue, Elkhart, IN 46515</b>
<b>County:</b>	<b>Elkhart</b>
<b>SIC Code:</b>	<b>3089</b>
<b>Operation Permit No.:</b>	<b>F039-7355-00291</b>
<b>Permit Reviewer:</b>	<b>Richard Moore/EVP</b>

On May 4, 1998, the Office of Air Management (OAM) had a notice published in the Elkhart Truth, Elkhart, Indiana, stating that Dylan Designs had applied for a Federally Enforceable State Operating Permit (FESOP) to operate a fiberglass components manufacturing plant. The notice also stated that OAM proposed to issue a FESOP for this operation and provided information on how the public could review the proposed FESOP 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 FESOP should be issued as proposed.

Upon further review, the OAM has decided to make the following changes to the FESOP (changes indicated by bold or strikeout for emphasis). The page numbers in the following revisions refer to the previously proposed FESOP. Due to the magnitude of changes made, the revised FESOP may have different page numbering. Please refer to the revised Table of Contents, pages 2 through 4, in the revised FESOP for the new page numbers of the following conditions described below.

- 1) In Section A, Source Summary, on page 4 of 30 of the FESOP, the following language has been included:

**SECTION A**

**SOURCE SUMMARY**

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

- 2) Condition A.5 (Prior Permit Conditions Superseded) on page 5 of 30 has been deleted.

- 3) Condition B.8, (Duty to Supplement and Provide Information), part (c), on page 6 of 30, has been changed as follows:

B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)]

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

- 4) Condition B.12, (Annual Compliance Certification), part (c), on page 8 of 30, has been changed to the following:

B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (c) The annual compliance certification report shall include the following:
- (1) The identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was **based on** continuous or intermittent **data**;
  - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
  - (5) Such other facts as specified in Sections D of this permit, IDEM, OAM, may require to determine the compliance status of the source.

- 5) Condition B.13, (Preventive Maintenance Plan), on page 8 of 30, has been changed as follows:

B.13 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each **facility**:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing ~~emission units and associated~~ emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
  - (c) PMP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM.
- 6) Condition B.15, (Deviations from Permit Requirements and Conditions), on page 10 of 30, has been changed as follows:

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

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

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

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

- (b) **A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:**
  - (1) **An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or**
  - (2) **An emergency as defined in 326 IAC 2-7-1(12); or**
  - (3) **Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.**
  - (4) **Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.**

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

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

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

7) Condition B.17, (Permit Renewal), part (a), on page 11 of 30, has been changed as follows:

**B.17 Permit Renewal [326 IAC 2-8-3(h)]**

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(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM and shall include the information specified in 326 IAC 2-8-3. 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).**

8) Condition B.18, (Administrative Permit Amendment), condition B.19, (Minor Permit Modification), and condition B.20, (Significant Permit Modification), on page 11 and 12 of 30, have all been combined into one condition numbered B.18 (Permit Amendment or Modification) shown below. Conditions B.19 and B.20 have been deleted and the remainder of Section B has been renumbered. The new condition B.18 reads as follows:

**B.18 Permit Amendment or Modification [326 IAC 2-8-10] [326 IAC 2-8-11]**

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(a) **The Permittee must comply with the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11 whenever the Permittee seeks to amend or modify this permit.**

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

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

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

(c) **The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]**

9) The following language has been added to part (e) of condition B.25 (now B.23), (Inspection and Entry), on page 14 of 30.

**B.23 Inspection and Entry [326 IAC 2-8-5(a)(2)]**

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(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements. [326 IAC 2-8-5(a)(4)]

- (1) **The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM, or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAM, nor an authorized representative, may disclose the information unless and until IDEM, OAM, makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]**
- (2) **The Permittee, and IDEM, OAM, acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]**

10) Condition B.26 (now B.24), (Transfer of Ownership or Operation), part (b), on page 14 of 30, has been changed as follows:

**B.24** Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-8-10]

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- (b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-8-10. **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).**

11) Condition B.27 (now B.25), (Annual Fee Payment), on page 15 of 30, has been changed as follows:

**B.25** Annual Fee Payment [326 IAC 2-8-4(6)] [326 IAC 2-8-16]

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- (a) The Permittee shall pay annual fees to IDEM, OAM within thirty (30) calendar days of receipt of a billing, ~~or in a time period consistent with the fee schedule established in 326 IAC 2-8-16.~~ **If the Permittee does not receive a bill from IDEM, OAM the applicable fee is due April 1 of each year.**
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) ~~If the Permittee does not receive a bill from IDEM, OAM, thirty (30) calendar days before the due date,~~ The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee. ~~The applicable fee is due April 1 of each year.~~

12) Condition B.26, (Credible Evidence), is a new condition that has been added to the end of section B, and reads as follows:

**B.26 Credible Evidence [326 IAC 2-8-4(3)][62 Federal Register 8313][326 IAC 2-8-5]**

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**Notwithstanding the conditions of this permit specifying practices for applicable requirements, other credible evidence may also be used to establish compliance or noncompliance with applicable requirements.**

13) Condition C.6, (Operation of Equipment), on page 17 of 30, has been changed as follows:

**C.6 Operation of Equipment [326 IAC 2-8-5(a)(4)]**

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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. ~~as described in Section D of this permit.~~

14) Condition C.7, (Asbestos Abatement Projects- Accreditation), on page 17 of 30, and Condition C.11, (Asbestos Abatement Projects), on page 18 of 30, have been combined into one condition which reads as follows:

**C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]**

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

**All required notifications shall be submitted to:**

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

**The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).**

- (e) Procedures for Asbestos Emission Control**  
**The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.**
- (f) Indiana Accredited Asbestos Inspector**  
**The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.**

- 15) In condition C.8, (Performance Testing), on page 17 of 30, the rule cite has been changed to 326 IAC 3-6, and the following language has been added:

**C.8 Performance Testing ~~[326 IAC 3-2-1]~~ [326 IAC 3-6]**

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- (a) All testing shall be performed according to the provisions of 326 IAC ~~3-2-1~~ **3-6** (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAM.

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

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

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

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

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

16) Condition C.9, (Compliance Monitoring), on page 17 of 30, has been changed as follows.

C.9 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

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

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

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

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

17) Condition C.10, (Monitoring Methods), on page 18 of 30, has been changed as follows:

C.10 Monitoring Methods [326 IAC 3]

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

18) Condition C.11, (Asbestos Abatement Projects), on page 18 of 30, has been deleted. It is now condition C.7, (Asbestos Abatement Projects), and has been revised there.

19) Condition C.12 (now C.11), (Risk Management Plan), on page 19 of 30, has been changed as follows:

C.15 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

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

(a) Submit:

- (1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
- (2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and

- (3) A verification to IDEM, OAM, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.
- (b) Provide annual certification to IDEM, OAM, that the Risk Management Plan is being properly implemented.

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

- 20) The following rule cites have been added to the title of condition C.13 (now C.12) (Actions Related to Noncompliance Demonstrated by a Stack Test), on page 19 of 30. Also, new language has been added at the end of the condition.

**C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4]  
[326 IAC 2-8-5]**

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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 corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

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

- 21) Condition C.16 (now C.15), (General Record Keeping Requirements), on page 20 of 30 has been changed as follows:

**C.19 General Record Keeping Requirements [326 IAC 2-8-4(3)(B)] [326 IAC 2-8-5]**

---

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location **for a minimum of three (3) years** and available **upon the request** ~~within one (1) hour upon verbal request~~ of an IDEM, OAM representative, for a minimum of three (3) years. ~~They~~ **The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request** ~~providing they are made available within thirty (30) days after written request.~~ **If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.**

22) Condition C.17 (now C.16), (General Reporting Requirements), on page 21 of 30, has been changed as follows:

**C.20** General Reporting Requirements [326 IAC 2-8-4(3)(C)]

- (a) To affirm that the source has met all the **compliance monitoring** requirements stated in this permit the source shall submit a Quarterly Compliance **Monitoring** Report. Any deviation from the requirements and the date(s) of each deviation must be reported.
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:
- Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period.
- (e) All instances of deviations **as described in Section B- Deviations from Permit Requirements Conditions** must be clearly identified in such reports. ~~A reportable deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:~~
- ~~(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or~~
  - ~~(2) An emergency as defined in 326 IAC 2-7-1(12); or~~
  - ~~(3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.~~
  - ~~(4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.~~
- ~~A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.~~
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

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

- 23) In Section D of the FESOP, (Facility Operation Conditions), the language **Facility Description [326 IAC 2-8-4(10)]** has been added to the facility description box.
- 24) Conditions D.1.4, on page 23 of 30, has been changed as follows:
- D.1.4 Testing Requirements [326 IAC 2-8-5(a)(1),(4)]
- 
- ~~Testing of The Permittee is not required to test this facility is not required by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC limit specified in Condition D.2.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. This does not preclude testing requirements on this facility under 326 IAC 2-8-4 and 326 IAC 2-8-5.~~
- 25) In the Certification Form, on page 26 of 30, “Emergency/Deviation Occurrence Reporting Form” has been deleted.
- 26) On the Emergency/ Deviation Occurrence Reporting Form, on page 29 of 30, “Attach a signed certification to complete this report” has been deleted from the bottom of the second page.
- 27) The Quarterly Compliance Report, on page 30 of 30, is now called the Quarterly Compliance Monitoring Report, the column marked “No Deviations” has been deleted, and the language has been changed as shown in the attached form.

Upon further review, the OAM has decided to make the following changes to the TSD.

- 28) On page 3 of 8, change the potential emissions of VOCs from 184.74 tons/year to 122.22 tons/year.
- 29) On page 3 of 8, change the potential emissions of Styrene from 176.95 tons/year to 117.53 tons/year.
- 30) On page 3 of 8, correct the spelling and change the potential emissions of Methyl Methacrylate from 7.08 tons/year to 4.16 tons/year.
- 31) On page 3 of 8, change the potential emissions of Total HAPs from 184.07 tons/year to 121.72 tons/year.
- 32) On page 4 of 8, change the Limited Potential emissions of VOCs (Booths 1 & 2) from 10.6 tons/year to 11.6 tons/year and Total VOCs from 10.62 tons/year to 11.62 tons/year.
- 33) On page 4 of 8, change the Limited Potential emissions of Single HAP from 9.4 tons/year to 9.9 tons/year and Total HAPs from 9.84 tons/year to 10.5 tons/year.
- 34) On page 4 of 8, change the footnote on the Limited Potential emissions Table from 5.3% of potential usage to 8.1% of potential usage and change “By limited ...” to “By limiting ...”.

- 35) On page 7 of 8, make the changes to the Table under (b) as shown on the following page.
- 36) On page 8 of 8, change the emission of any Single HAP from 9.4 tons/year to 9.9 tons/year (three places) and change the HAP content to 90% from 88%.

<b>Material</b>	<b>Facility's Code</b>	<b>Pounds</b>	<b>Gallons</b>
Orange Tooling Gel L/F	945YAO58	<b>640</b>	<b>71</b>
Flexible Grey Sandable	GP8-5100	<b>9383</b>	<b>910</b>
Black Neo Gelcoat	GG6-5013	<b>4467</b>	<b>475</b>
Premium Clearcoat	ACO0506	<b>9390</b>	<b>1074.5</b>
White Gelcoat	GG1-5260	<b>3034</b>	<b>283.5</b>
White	GH1-5340	<b>1514</b>	<b>141.5</b>
Polyester Resin	40-4385	<b>129560</b>	<b>14349</b>
Hi-Speed Hardener	83025	<b>582</b>	<b>61.5</b>
Lupersol DHD-9 Red	DHD-9	<b>3123</b>	<b>346</b>
Microcel Body Filler	60079	<b>590</b>	<b>65</b>
Laminex	126031	<b>1071</b>	<b>118.5</b>

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

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
 QUARTERLY COMPLIANCE MONITORING REPORT**

Source Name: Dylan Designs  
 Source Address: 1701 Sterling Avenue, Elkhart, IN 46515  
 Mailing Address: P.O. Box 936 - 1701 Sterling Avenue, Elkhart, IN 46515  
 FESOP No.: F039-7355-00291

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

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

**9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD**

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

<b>Compliance Monitoring Requirement (e.g. Permit Condition D.1.3)</b>	<b>Number of Deviations</b>	<b>Date of each Deviations</b>	<del><b>No Deviations</b></del>

Form Completed By: \_\_\_\_\_  
 Title/Position: \_\_\_\_\_  
 Date: \_\_\_\_\_  
 Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**Appendix A: Emissions Calculations  
Reinforced Plastics and Composites  
Non Vapor Suppressed (NVS) Fiberglass Processes**

**Company Name: Dylan Designs  
Address City IN Zip: 1701 Sterling Avenue, Elkhart, IN 46515  
FESOP: F039-7355-00291  
Reviewer: Richard A. Moore Jr./EVP  
Date: 6/19/98**

**Emissions Calculations**

Material	CODE	Weight % VOC	Weight % Styrene	Flash off Factor (%)	Styrene Em. Factor (%)	Density (lb/gal)	Gallons per unit	Units per hour	Pound VOC per hour	Pounds VOC per day	Tons of VOC per Year	Tons of Styrene per Year	PM tons per year	Transfer Efficiency
Orange Tooling Gel L/F	945YAO58	47.05%	42.31%		24.30%	9.06	1.000000	1.00	2.45	58.75	10.72	9.64	21.01	0.00%
Flexible Grey Sandable	GP8-5100	40.54%	40.13%		22.10%	10.32	1.000000	1.00	2.30	55.30	10.09	9.99	26.88	0.00%
Black Neo Gelcoat	GG6-5013	41.19%	36.46%		18.30%	9.42	2.000000	0.13	0.49	11.68	2.13	1.89	6.07	0.00%
Premium Clearcoat	ACO0506	52.49%	51.51%		33.90%	8.74	2.000000	0.50	3.02	72.46	13.22	12.98	18.19	0.00%
White Gelcoat	GG1-5260	35.00%	31.02%		12.60%	10.70	10.000000	0.25	3.80	91.27	16.66	14.76	76.16	0.00%
White	GH1-5340	35.16%	31.23%		12.90%	10.72	10.000000	0.13	1.95	46.71	8.52	7.57	38.06	0.00%
Lupersol DHD-9 Red	DHD-9	98.10%	0.00%	100.00%		9.03	0.001200	1.00	0.01	0.26	0.05	0.00	0.00	0.00%
Poylester Resin	40-4385	39.13%	39.13%		9.90%	9.03	25.000000	0.60	13.41	321.83	58.73	58.73	361.12	0.00%
Hi-Speed Hardener	83025	20.00%	0.00%	25.90%		9.50	0.040000	0.25	0.00	0.12	0.02	0.00	0.33	0.00%
Lupersol DHD-9 Red	DHD-9	98.10%	0.00%	100.00%		9.03	0.001200	1.00	0.01	0.26	0.05	0.00	0.00	0.00%
Microcel body filler	60079	19.00%	18.00%	25.90%		9.02	0.500000	1.00	0.22	5.33	0.97	0.92	16.00	0.00%
Laminex	126031	40.00%	40.00%		10.60%	9.00	0.250000	1.00	0.24	5.72	1.04	1.04	5.91	0.00%
Acetone														
		0.0%		0.00%			0.000000	0.00	0.00	0.00	0.00	0.00	0.00	0.00%
		0.0%		0.00%			0.000000	0.00	0.00	0.00	0.00	0.00	0.00	0.00%
<b>Totals:</b>									<b>27.90</b>	<b>669.68</b>	<b>122.22</b>	<b>117.53</b>	<b>569.73</b>	

**Federal Potential Emissions (controlled):**

	Material Usage Limitation (%)	Control Efficiency		Controlled VOC Pounds per Hour	Controlled VOC Pounds per Day	Controlled VOC Tons per Year	Controlled PM tons per Year
		VOC	PM				
<b>Total Federal Potential Emissions:</b>			<b>99.00%</b>	<b>27.90</b>	<b>669.68</b>	<b>122.22</b>	<b>5.70</b>

**METHODOLOGY**

**When Styrene Emission Factor is Available:**

Potential Styrene Tons per Year = Density (lb/gal) x Gal of Material (gal/unit) x Maximum (unit/hr) x Emission factor x 4.38 tons/yr/lbs/hr

Potential VOC Pounds per Hour = Tons/yr of Styrene x Weight % VOC / Weight % Monomer /4.38 tons/yr/lbs/hr

**When Styrene Emission Factor is Not Available:**

Potential VOC Pounds per Hour = Density (lb/gal)\* Weight % Monomer \* Gal of Material (gal/unit) \* Maximum (unit/hr) \* Flash off factor

Potential VOC Pounds per Day =Density (lb/gal)\* Weight % Monomer \* Gal of Material (gal/unit) \* Maximum (unit/hr) \* (24 hrs / 1 day) \* Flash off factor

Potential VOC Tons per Year = Density (lb/gal)\* Weight % Monomer \* Gal of Material (gal/unit) \* Maximum (unit/hr) \* (8760 hr/yr) \* (1 ton / 2000 lbs) \* Flash off factor

Particulate Potential Tons per Year = (units/hour) \* (gal/unit) \* (lbs/gal) \* (1 - Weight % Volatiles) \* (1 - Transfer efficiency) \* (8760 hr/yr) \* (1 ton / 2000 lbs)

Total = Sum of all worst case coatings and solvents used

Flash Off Factor (%) = calculated % flash off or minimum flash off, whichever is greater

HAP Emission Calculations

Potential Emissions

Company Name: Dylan Designs  
 Address City IN Zip: 1701 Sterling Avenue, Elkhart, IN 46515  
 FESOP: F039-7355-00291  
 Reviewer: Richard A. Moore Jr./EVP  
 Date: 6/19/98

Material		Density (lb/gal)	Gallons per unit	Units per hour	Flash off Factor (%)	Styrene Emission Factor (%)	Weight % Styrene	Weight % MEK	Weight % Dimethyl Phthalate	Weight % Methyl Methacrylate	Styrene Emissions (ton/yr)	MEK Emissions (ton/yr)	Dimethyl Phthalate Emissions (ton/yr)	Methyl Methacrylate Emissions (ton/yr)
Orange Tooling Gel/LF	945YAO58	9.06	1.000000	1.00	88.50%	24.30%	42.31%	0.00%	0.00%	4.73%	9.64	0.00	0.00	1.08
Flexible Grey Sandable	GP8-5100	10.32	1.000000	1.00	87.50%	22.10%	40.13%	0.00%	0.00%	0.00%	9.99	0.00	0.00	0.00
Black Neo Gelcoat	GG6-5013	9.42	2.000000	0.13	86.61%	18.30%	36.46%	0.00%	0.00%	4.00%	1.89	0.00	0.00	0.21
Premium Clearcoat	ACO0506	8.74	2.000000	0.50	90.91%	33.90%	51.51%	0.00%	0.00%	0.00%	12.98	0.00	0.00	0.00
White Gelcoat	GG1-5260	10.70	10.000000	0.25	66.40%	12.60%	31.02%	0.00%	0.00%	4.00%	14.76	0.00	0.00	1.90
White	GH1-5340	10.72	10.000000	0.13	83.21%	12.90%	31.23%	0.00%	0.00%	4.00%	7.57	0.00	0.00	0.97
Lupersol DHD-9 Red	DHD-9	9.03	0.001200	1.00	100.00%		0.00%	1.00%	32.00%	0.00%	0.00	0.00	0.02	0.00
Poylster Resin	40-4385	9.03	25.000000	0.60	36.06%	9.90%	39.13%	0.00%	0.00%	0.00%	58.73	0.00	0.00	0.00
Hi-Speed Hardener	83025	9.50	0.040000	0.25	25.90%		0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00
Lupersol DHD-9 Red	DHD-9	9.03	0.001200	1.00	100.00%		0.00%	1.00%	32.00%	0.00%	0.00	0.00	0.02	0.00
Microcel body filler	60079	9.02	0.500000	1.00	25.90%		18.00%	0.00%	0.00%	0.00%	0.92	0.00	0.00	0.00
Laminex	126031	9.00	0.250000	1.00	25.90%	10.60%	40.00%	0.00%	0.00%	0.00%	1.04	0.00	0.00	0.00
Acetone							0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00

Total State Potential Emissions 7.85 117.53 0.00 0.03 4.16

Total Potential HAP Emmissions = 121.72 Tons/year Tons/year

**METHODOLOGY**

**When Styrene Emission Factor is Available:**

Potential Styrene Tons per Year = Density (lb/gal) x Gal of Material (gal/year) x Emission factor (lbs emit/lbs used) / 2000 lbs/tons  
 Potential HAP/VOC Tons per Year = Tons/yr of Styrene x Weight % (HAP/VOC) / Weight % Monomer

**When Styrene Emission Factor is Not Available:**

Gal of Mat = (Gallons/year)/(8760 hour/year)  
 HAPS (TPY) = Density\*Gallons/yr\*Flash off %\*Wt %HAP\*ton/2000 lbs

Limited Emissions

Company Name: Dylan Designs  
 Address City IN Zip: 1701 Sterling Avenue, Elkhart, IN 46515  
 FESOP: F039-7355-00291  
 Reviewer: Richard A. Moore Jr./EVP  
 Date: 6/23/98

Material		Density (lb/gal)	Gallons per year Minimum Limit	Gallons per year Conservative Potential	Flash off Factor (%)	Styrene Emission Factor (%)	Weight % Styrene	Weight % MEK	Weight % Dimethyl Phthalate	Weight % Methyl Methacrylate	Weight % VOC	Styrene Emissions (ton/yr)	MEK Emissions (ton/yr)	Dimethyl Phthalate Emissions (ton/yr)	Methyl Methacrylate Emissions (ton/yr)	Total VOCs Emissions (ton/yr)
Orange Tooling Gel L/F	945YAO58	9.06	71.0	8760.0	88.50%	24.30%	42.31%	0.00%	0.00%	4.73%	47.05%	0.08	0.00	0.00	0.01	0.09
Flexible Grey Sandable	GP8-5100	10.32	909.9	8760.0	87.50%	22.10%	40.13%	0.00%	0.00%	0.00%	40.54%	1.04	0.00	0.00	0.00	1.05
Black Neo Gelcoat	GG6-5013	9.42	475.2	2190.0	86.61%	18.30%	36.46%	0.00%	0.00%	4.00%	41.19%	0.41	0.00	0.00	0.04	0.46
Premium Clearcoat	ACO0506	8.74	1074.4	8760.0	90.91%	33.90%	51.51%	0.00%	0.00%	0.00%	52.49%	1.59	0.00	0.00	0.00	1.62
White Gelcoat	GG1-5260	10.70	283.5	21900.0	66.40%	12.60%	31.02%	0.00%	0.00%	4.00%	35.00%	0.19	0.00	0.00	0.02	0.22
White	GH1-5340	10.72	141.5	10950.0	83.21%	12.90%	31.23%	0.00%	0.00%	4.00%	35.16%	0.10	0.00	0.00	0.01	0.11
Lupersol DHD-9 Red	DHD-9	9.03	173.1	10.5	100.00%		0.00%	1.00%	32.00%	0.00%	98.10%	0.00	0.01	0.25	0.00	0.77
Poylester Resin	40-4385	9.03	14349.2	131400.0	36.06%	9.90%	39.13%	0.00%	0.00%	0.00%	39.13%	6.41	0.00	0.00	0.00	6.41
Hi-Speed Hardener	83025	9.50	61.3	87.6	25.90%		0.00%	0.00%	0.00%	0.00%	20.00%	0.00	0.00	0.00	0.00	0.02
Lupersol DHD-9 Red	DHD-9	9.03	173.1	10.5	100.00%		0.00%	1.00%	32.00%	0.00%	98.10%	0.00	0.01	0.25	0.00	0.77
Microcel body filler	60079	9.02	65.1	4380.0	25.90%		18.00%	0.00%	0.00%	0.00%	19.00%	0.01	0.00	0.00	0.00	0.01
Laminex	126031	9.00	118.6	2190.0	25.90%	10.60%	40.00%	0.00%	0.00%	0.00%	40.00%	0.06	0.00	0.00	0.00	0.06
Acetone							0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00

Total State Potential Emissions 9.89      0.02      0.50      0.09      11.58

Total Potential HAP Emmissions = **10.50** Tons/year Tons/year

**METHODOLOGY**

**When Styrene Emission Factor is Available:**

Potential Styrene Tons per Year = Density (lb/gal) x Gal of Material (gal/year) x Emission factor (lbs emit/lbs used) / 2000 lbs/tons  
 Potential HAP/VOC Tons per Year = Tons/yr of Styrene x Weight % (HAP/VOC) / Weight % Monomer

**When Styrene Emission Factor is Not Available:**

Gal of Mat = (Gallons/year)/(8760 hour/year)  
 HAPS (TPY) = Density \* Gallons/yr \* Wt % HAP \* ton/2000 lbs

Actual Emissions

Company Name: Dylan Designs  
 Address City IN Zip: 1701 Sterling Avenue, Elkhart, IN 46515  
 FESOP: F039-7355-00291  
 Reviewer: Richard A. Moore Jr./EVP  
 Date: 6/22/98

Material		Density (lb/gal)	Gallons per year <b>Actual</b>	Gallons per year <b>Potential</b>	Flash off Factor (%)	Styrene Emission Factor (%)	Weight % Styrene	Weight % MEK	Weight % Dimethyl Phthalate	Weight % Methyl Methacrylate	Weight % VOC	Styrene Emissions (ton/yr)	MEK Emissions (ton/yr)	Dimethyl Phthalate Emissions (ton/yr)	Methyl Methacrylate Emissions (ton/yr)	Total VOCs Emissions (ton/yr)
Orange Tooling Gel L/F	945YAO58	9.06	29.3	8760.0	88.50%	24.30%	42.31%	0.00%	0.00%	4.73%	47.05%	0.03	0.00	0.00	0.00	0.04
Flexible Grey Sandable	GP8-5100	10.32	375.0	8760.0	87.50%	22.10%	40.13%	0.00%	0.00%	0.00%	40.54%	0.43	0.00	0.00	0.00	0.43
Black Neo Gelcoat	GG6-5013	9.42	195.9	2190.0	86.61%	18.30%	36.46%	0.00%	0.00%	4.00%	41.19%	0.17	0.00	0.00	0.02	0.19
Premium Clearcoat	ACO0506	8.74	442.8	8760.0	90.91%	33.90%	51.51%	0.00%	0.00%	0.00%	52.49%	0.66	0.00	0.00	0.00	0.67
White Gelcoat	GG1-5260	10.70	116.8	21900.0	66.40%	12.60%	31.02%	0.00%	0.00%	4.00%	35.00%	0.08	0.00	0.00	0.01	0.09
White	GH1-5340	10.72	58.3	10950.0	83.21%	12.90%	31.23%	0.00%	0.00%	4.00%	35.16%	0.04	0.00	0.00	0.01	0.05
Lupersol DHD-9 Red	DHD-9	9.03	71.3	10.5	100.00%		0.00%	1.00%	32.00%	0.00%	98.10%	0.00	0.00	0.10	0.00	0.32
Poylester Resin	40-4385	9.03	5913.6	131400.0	36.06%	9.90%	39.13%	0.00%	0.00%	0.00%	39.13%	2.64	0.00	0.00	0.00	2.64
Hi-Speed Hardener	83025	9.50	25.3	87.6	25.90%		0.00%	0.00%	0.00%	0.00%	20.00%	0.00	0.00	0.00	0.00	0.01
Lupersol DHD-9 Red	DHD-9	9.03	71.3	10.5	100.00%		0.00%	1.00%	32.00%	0.00%	98.10%	0.00	0.00	0.10	0.00	0.32
Microcel body filler	60079	9.02	26.8	4380.0	25.90%		18.00%	0.00%	0.00%	0.00%	19.00%	0.01	0.00	0.00	0.00	0.01
Laminex	126031	9.00	48.9	2190.0	25.90%	10.60%	40.00%	0.00%	0.00%	0.00%	40.00%	0.02	0.00	0.00	0.00	0.02
Acetone							0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00

Total State Potential Emissions 4.08      0.01      0.21      0.04      4.77

Total Potential HAP Emmissions = **4.33** Tons/year Tons/year

**METHODOLOGY**

**When Styrene Emission Factor is Available:**

Potential Styrene Tons per Year = Density (lb/gal) x Gal of Material (gal/year) x Emission factor (lbs emit/lbs used) / 2000 lbs/tons  
 Potential HAP/VOC Tons per Year = Tons/yr of Styrene x Weight % (HAP/VOC) / Weight % Monomer

**When Styrene Emission Factor is Not Available:**

Gal of Mat = (Gallons/year)/(8760 hour/year)  
 HAPS (TPY) = Density \* Gallons/yr \* Wt % HAP \* ton/2000 lbs

**Appendix A: Emission Calculations  
Natural Gas Combustion  
MM Btu/hr 0.3 - < 10**

**Company Name: Dylan Designs  
Address City IN Zip: 1701 Sterling Avenue, Elkhart, IN 46515  
FESOP: F039-7355-00291  
Reviewer: Richard A. Moore Jr./EVP  
Date: 02/26/98**

Heat Input Capacity  
MMBtu/hr

Potential Throughput  
MMCF/yr

0.6

5.3

Heat Input Capacity includes:  
[LIST ALL UNITS AND THEIR CAPACITIES]

	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	11.9	11.9	0.6	100.0	5.8	21.0
Potential Emission in tons/yr	0.03	0.03	0.00	0.26	0.02	0.06

Methodology:

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors for NOx: uncontrolled = 100, Low Nox Burner = 17, Flue gas recirculation = 36

Emission Factors for CO: uncontrolled = 21, Low NOx burner = 15, Flue Gas Recirculation = ND.

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, and 1.4-3, SCC #1-03-006-03

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