

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

**J. B. Pointdexter & Company, Inc., dba Leer, Inc., dba Leer Midwest  
58288 Ventura Drive and 28858 Ventura Drive  
Elkhart, Indiana 46517**

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 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.: T039-7561-00097	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date:

## SECTION A SOURCE SUMMARY

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

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

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The Permittee owns and operates a stationary manufacturing and coating of fiberglass reinforced pickup truck caps and tonneau covers plant.

Responsible Official: Renee Maear  
Source Address: Plants 1 and 2: 58288 Ventura Drive and Plant 3: 28858 Ventura Drive, Elkhart, Indiana 46517  
Mailing Address: 58288 Ventura Drive, Elkhart, Indiana 46517  
SIC Code: 3792  
County Location: Elkhart  
County Status: Attainment for all criteria pollutants  
Source Status: Part 70 Permit Program  
Major Source, under PSD Rules;  
Major Source, Section 112 of the Clean Air Act

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

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

#### Plant 1: 58288 Ventura Drive

- (1) One (1) mold preparation operation, identified as Plant 1, with a maximum capacity to coat 10.0 fiberglass molds per hour.
- (2) Two (2) HVLP gelcoat booths, identified as Plant 1, with a maximum capacity to coat 10.0 fiberglass molds per hour, using dry filters to control particulate matter emissions, exhausting to stacks E 8-1 and E9-1.
- (3) Two (2) chop booths (laminating process), identified as Plant 1, with a maximum capacity to laminate 10.0 fiberglass molds per hour, using dry filters to control particulate matter emissions, exhausting to stacks E 6-1 and E7-1.
- (4) One (1) hand wipe and HVLP final finish and liner insert operation, identified as Plant 1, with a maximum capacity of 10.0 fiberglass truck covers per hour, using dry filters for the HVLP process to control particulate matter emissions, exhausting to a vent (fugitive).
- (5) Two (2) HVLP paint booths (prep. and paint process), identified as Plant 1, with a maximum capacity of 10.0 fiberglass truck covers per hour, using dry filters to control particulate matter emissions, exhausting to stacks E1-1, E2-1, E3-1, E4-1, and E5-1.
- (6) One (1) handgrinding and water jet cutter operation, identified as Plant 1, with a maximum capacity to grind 1189.15 pounds of fiberglass truck covers per hour, using a baghouse to control particulate matter emissions, exhausting to stack P1-1.

- (7) Two (2) above ground resin storage tanks, identified as Tank 1 and Tank 2, each with an annual throughput of 130,000 gallons per year (each tank has a capacity of 5,000 gallons). Tank 1 was constructed in 1981 and Tank 2 was constructed in 1982.

**Plant 2: 58288 Ventura Drive**

- (8) One (1) hand application touch-up area, identified as B4, with a maximum capacity to coat 12.5 laminated parts per hour, exhausting to stacks PV1, PV2, and PV3.
- (9) Two (2) HVLP coating booths, identified as B5 and B6, each with a maximum capacity to coat 12.5 laminated parts per hour, using dry filters to control particulate matter emissions, with B5 exhausting to stacks V13, V14, V15, and V16 and B6 exhausting to V17, V18, V19, and V20.
- (10) One (1) fiberglass parts grinding operation, identified as Plant 2, with a maximum capacity to machine 384.5 pounds of fiberglass parts per hour, using dry filters to control particulate matter emissions, exhausting to stack BH-1.

**Plant 3: 28858 Ventura Drive**

- (11) One (1) air-assisted airless laminating area, identified as E1, with a maximum capacity to laminate 0.05 fiberglass molds per hour, using dry filters to control particulate matter emissions, exhausting to stack E1.
- (12) One (1) air-assisted airless gelcoating booth, identified as E2, with a maximum capacity to coat 0.05 fiberglass molds per hour, using dry filters to control particulate matter emissions, exhausting to E2.
- (13) One (1) final finish operation, identified as Mold and FF, with a maximum capacity of 0.05 fiberglass molds per hour.
- (14) One (1) sanding operation, identified as Plant 3, with a maximum capacity to sand 50 pounds of fiberglass mold per hour, using a cloth filter to control particulate matter emissions, exhausting to stacks GV1 and GV2.

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

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

**Plant 1: 58288 Ventura Drive**

- (1) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone.
- (2) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.

**Plant 2: 58288 Ventura Drive**

- (3) Degreasing operation that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.

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

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

- (a) It is a major source, as defined in 326 IAC 2-7-1(22).
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

## **SECTION B GENERAL CONDITIONS**

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

- (a) Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7.
- (b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-1-3.2 or 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled "Permit Shield."

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

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

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

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

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

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

### **B.5 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]**

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

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

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

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

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

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

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

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

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

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

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

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

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

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

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

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
  - (1) The identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was based on continuous or intermittent data;
  - (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3);
  - (5) Any insignificant activity that has been added without a permit revision; and
  - (6) Such other facts, as specified in Sections D of this permit, as IDEM, OAM, may require to determine the compliance status of the source.

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

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

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

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

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

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

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

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
  - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;
  - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
  - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Management,  
Compliance Section), or  
Telephone Number: 317-233-5674 (ask for Compliance Section)  
Facsimile Number: 317-233-5967

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

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

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

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

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

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

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAM, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(9) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAM, by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
  - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
  - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
    - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
    - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

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

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

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

- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:
  - (1) The applicable requirements are included and specifically identified in this permit; or
  - (2) The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.
- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application.
- (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
  - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
  - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
  - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
  - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM, has issued the modification. [326 IAC 2-7-12(b)(8)]

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

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

**B.16** Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

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

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

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

- (b) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent.
- (c) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

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

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)]
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM, determines any of the following:
- (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAM, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

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

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

Request for renewal shall be submitted to:

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

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
- (1) A timely renewal application is one that is:
- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due. [326 IAC 2-5-3]
- (2) If IDEM, OAM, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]  
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAM, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAM, any additional information identified as being needed to process the application.
- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]  
If IDEM, OAM, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

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

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

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

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

**B.20 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)]**  
**[326 IAC 2-7-12 (b)(2)]**

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- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

**B.21 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(b)]**

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The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:

- (a) For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.
- (b) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).

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

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

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

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

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

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

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

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

- (b) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:
  - (1) A brief description of the change within the source;
  - (2) The date on which the change will occur;
  - (3) Any change in emissions; and
  - (4) Any permit term or condition that is no longer applicable as a result of the change.

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

- (c) Emission Trades [326 IAC 2-7-20(c)]  
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAM, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

**B.23 Construction Permit Requirement [326 IAC 2]**

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

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

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

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.  
[326 IAC 2-7-6(6)]
  - (1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM, or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAM, nor an authorized representative, may disclose the information unless and until IDEM, OAM, makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]
  - (2) The Permittee, and IDEM, OAM, acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

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

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

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch, within thirty (30) days of the change. Notification shall include a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the Permittee and the new owner.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11. The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

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

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

## SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

**C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]**

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

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

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

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

**C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]**

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

**C.4 Incineration [326 IAC 4-2][326 IAC 9-1-2]**

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

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

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

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

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

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

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

- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
  - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
  - (2) If there is a change in the following:
    - (A) Asbestos removal or demolition start date;
    - (B) Removal or demolition contractor; or
    - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

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

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

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

#### **C.8 Performance Testing [326 IAC 3-6]**

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- (a) All testing shall be performed according to the provisions of 326 IAC 3-2.1 (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 the intended 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 with five (5) days prior to the end of the initial forty-five (45) day period.

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

#### **C.9 Compliance Schedule [326 IAC 2-7-6(3)]**

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The Permittee:

- (a) Has certified that all facilities at this source are in compliance with all applicable requirements; and
- (b) Has submitted a statement that the Permittee will continue to comply with such requirements; and
- (c) Will comply with such applicable requirements that become effective during the term of this permit.

#### **C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(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 compliance schedule an additional ninety (90) days provided the Permittee notifies:

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

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

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

#### **C.11 Maintenance of Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]**

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- (a) In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour until such time as the continuous monitor is back in operation.

- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

**C.12 Monitoring Methods [326 IAC 3]**

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Any monitoring or testing performed to meet the 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.

**C.13 Pressure Gauge Specifications**

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Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ( $\pm 2\%$ ) of full scale reading.

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

**C.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]**

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

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:

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

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

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

- (c) If the ERP is disapproved by IDEM, OAM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAM, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

**C.15 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]**

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If a regulated substance, subject to 40 CFR 68, is present 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.16 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5][326 IAC 2-7-6]  
[326 IAC 1-6]

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- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
  - (1) This condition;
  - (2) The Compliance Determination Requirements in Section D of this permit;
  - (3) The Compliance Monitoring Requirements in Section D of this permit;
  - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
  - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :
    - (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
    - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.

- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
  - (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;
  - (3) An automatic measurement was taken when the process was not operating; or
  - (4) The process has already returned to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]  
[326 IAC 2-7-6]

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

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

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

C.18 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

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- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

- (1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
  - (2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:

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

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

C.19 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]

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

C.20 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

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

C.21 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported.
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

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

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

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

### **Stratospheric Ozone Protection**

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

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

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

## SECTION D.1 FACILITY OPERATION CONDITIONS

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

#### Plant 1: 58288 Ventura Drive

- (1) One (1) mold preparation operation, identified as Plant 1, with a maximum capacity to coat 10.0 fiberglass molds per hour.
- (2) Two (2) HVLP gelcoat booths, identified as Plant 1, with a maximum capacity to coat 10.0 fiberglass molds per hour, using dry filters to control particulate matter emissions, exhausting to stacks E 8-1 and E9-1.
- (3) Two (2) chop booths (laminating process), identified as Plant 1, with a maximum capacity to laminate 10.0 fiberglass molds per hour, using dry filters to control particulate matter emissions, exhausting to stacks E 6-1 and E7-1.
- (4) One (1) hand wipe and HVLP final finish and liner insert operation, identified as Plant 1, with a maximum capacity of 10.0 fiberglass truck covers per hour, using dry filters for the HVLP process to control particulate matter emissions, exhausting to a vent (fugitive).
- (5) Two (2) HVLP paint booths (prep. and paint process), identified as Plant 1, with a maximum capacity of 10.0 fiberglass truck covers per hour, using dry filters to control particulate matter emissions, exhausting to stacks E1-1, E2-1, E3-1, E4-1, and E5-1.
- (6) One (1) handgrinding and water jet cutter operation, identified as Plant 1, with a maximum capacity to grind 1189.15 pounds of fiberglass truck covers per hour, using a baghouse to control particulate matter emissions, exhausting to stack P1-1.
- (7) Two (2) above ground resin storage tanks, identified as Tank 1 and Tank 2, each with an annual throughput of 130,000 gallons per year (each tank has a capacity of 5,000 gallons). Tank 1 was constructed in 1981 and Tank 2 was constructed in 1982.

#### Insignificant Activities:

- (1) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone.
- (2) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.

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

#### D.1.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the surface coating operations, trimmers (insignificant activity), grinding and machining equipment (insignificant activity) 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 60,000 pounds per hour shall be accomplished by use of the equation:

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

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

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

#### D.1.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

### **Compliance Determination Requirements**

#### D.1.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

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

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

#### D.1.4 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the fiberglass operations and surface coating stacks (E8-1, E9-1, E6-1, E7-1, E1-1, E2-1, E3-1, E4-1, and E5-1) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

#### D.1.5 Particulate Matter (PM) [326 IAC 6]

Pursuant to 326 IAC 6 and CP No. 039-00097, issued on October 25, 1991, the particulate matter overspray from the surface coating facilities shall be considered in compliance with 326 IAC 6 provided that the overspray is not:

- (a) visibly detectable at the exhaust,
- (b) accumulated on the rooftops or on the ground, or
- (c) causing any nuisance problems.

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

### **D.1.6 Record Keeping Requirements**

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- (a) To document compliance with Condition D.1.1, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
  
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

## SECTION D.2 FACILITY OPERATION CONDITIONS

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

#### Plant 2: 58288 Ventura Drive

- (8) One (1) hand application touch-up area, identified as B4, with a maximum capacity to coat 12.5 laminated parts per hour, exhausting to stacks PV1, PV2, and PV3.
- (9) Two (2) HVLP coating booths, identified as B5 and B6, each with a maximum capacity to coat 12.5 laminated parts per hour, using dry filters to control particulate matter emissions, with B5 exhausting to stacks V13, V14, V15, and V16 and B6 exhausting to V17, V18, V19, and V20.
- (10) One (1) fiberglass parts grinding operation, identified as Plant 2, with a maximum capacity to machine 384.5 pounds of fiberglass parts per hour, using dry filters to control particulate matter emissions, exhausting to stack BH-1.

Insignificant Activity: Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.

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

#### D.2.1 Volatile Organic Compound (VOC) [326 IAC 2-2]

Pursuant to CP No. 039-5284-00097, issued on July 21, 1996, the input volatile organic compounds delivered to the applicators of Booths B4, B5, and B6, including clean-up solvents shall be limited, in total, to 3.25 tons per month. Therefore 326 IAC 2-2 and 40 CFR 52.21 (PSD rules) does not apply.

#### D.2.2 Volatile Organic Compound (VOC) [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6 and CP No. 039-5284-00097, issued on July 21, 1996, Booths B4, B5, B6, shall use Best Available Control Technology (BACT). The BACT determined for these facilities are:

- (a) The use of High Volume Low Pressure (HVLP) application systems for Booths B5 and B6;
- (b) Hand application method for Area B4;
- (c) The HVLP applicators shall be used at all times during which Booths B5 and B6 are operated; and
- (d) Hand applicators shall be used at all times during which Area B4 is operated.

#### D.2.3 Volatile Organic Compound (VOC) [326 IAC 8-3-5]

Pursuant to 326 IAC 8-3-5(a) (Cold cleaner degreaser operation and control), the owner or operator of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:

- (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
  - (A) the solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));

- (B) the solvent is agitated; or
  - (C) the solvent is heated.
- (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or (six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
- (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
- (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
- (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or (six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
- (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
  - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
  - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:

- (1) Close the cover whenever articles are not being handled in the degreaser.
- (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
- (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

#### D.2.4 Particulate Matter (PM) [326 IAC 6-3-2(c)]

- (a) Pursuant to 326 IAC 6-3 (Process Operations) and CP No. 039-5284-00097, issued on July 21, 1996, the actual PM emission rate from the fiberglass grinding operations shall not exceed the allowable emission rate of 6.24 pounds per hour.
- (b) In order to avoid the requirements of PSD, the annual PM emission rate from the fiberglass grinding operations shall be less than 25 tons per year and the annual PM10 emission rate shall be less than 15 tons per year.

#### D.2.5 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the surface coating operations 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 60,000 pounds per hour shall be accomplished by use of the equation:

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

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

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

#### D.2.6 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

### **Compliance Determination Requirements**

#### D.2.7 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the particulate matter limit specified in Conditions D.2.4 and D.2.5 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

#### D.2.8 VOC Emissions

Compliance with Condition D.2.1 shall be demonstrated at the end of each month based on the total volatile organic compound usage for the most recent 12 consecutive month period.

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

#### D.2.9 Particulate Matter (PM)

- (a) Pursuant to CP-039-5284-00097, issued on June 2, 1995, the dry filters shall be operated at all times when the fiberglass grinding is in operation.
- (b) Failure or partial failure of control devices shall be reported to IDEM according to the procedure specified for malfunctions in 326 IAC 1-6-2, in which case the provisions of 326 IAC 1-6-5 may apply at the discretion of IDEM.

#### D.2.10 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the fiberglass operations and surface coating stacks (PV1, PV2, PV3, V13, V14, V15, V16, V17, V18, V19, V20) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

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

**D.2.11 Particulate Matter (PM) [326 IAC 6]**

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Pursuant to 326 IAC 6 and CP No. 039-5284-00097, issued on July 21, 1996, the particulate matter overspray from the surface coating facilities shall be considered in compliance with 326 IAC 6 provided that the overspray is not:

- (a) visibly detectable at the exhaust,
- (b) accumulated on the rooftops or on the ground, or
- (c) causing any nuisance problems.

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

**D.2.12 Record Keeping Requirements**

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- (a) To document compliance with Condition D.2.1 and D.2.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.3.
  - (1) The amount and VOC content by weight of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
  - (2) A log of the dates of use;
  - (3) The cleanup solvent usage for each month;
  - (4) The total VOC usage for each month; and
  - (5) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.2.5, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.2.13 Reporting Requirements

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A quarterly summary of the information to document compliance with Condition D.2.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

## SECTION D.3 FACILITY OPERATION CONDITIONS

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

#### Plant 3: 28858 Ventura Drive

- (11) One (1) air-assisted airless laminating area, identified as E1, with a maximum capacity to laminate 0.05 fiberglass molds per hour, using dry filters to control particulate matter emissions, exhausting to stack E1.
- (12) One (1) air-assisted airless gelcoating booth, identified as E2, with a maximum capacity to coat 0.05 fiberglass molds per hour, using dry filters to control particulate matter emissions, exhausting to E2.
- (13) One (1) final finish operation, identified as Mold and FF, with a maximum capacity of 0.05 fiberglass molds per hour.
- (14) One (1) sanding operation, identified as Plant 3, with a maximum capacity to sand 50 pounds of fiberglass mold per hour, using a cloth filter to control particulate matter emissions, exhausting to stacks GV1 and GV2.

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

#### D.3.1 Volatile Organic Compound (VOC) [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6 (General provisions relating to VOC rules: general reduction requirements for new facilities):

- (a) Use of gel coats, resins, cleanup solvents, and other material containing volatile organic compounds (VOC) shall be limited such that the potential to emit (PTE) VOC shall be less than twenty-five (25) tons per twelve (12) consecutive months. Compliance with this limit shall be determined based upon the following criteria:
  - (1) Monthly usage by weight, monomer content, method of application, and other emission reduction techniques for each gel coat and resin shall be recorded. VOC emissions shall be calculated by multiplying the usage of each gel coat and resin by the emission factor that is appropriate for the monomer content, method of application, and other emission reduction techniques for each gel coat and resin, and summing the emissions for all gel coats and resins. Emission factors shall be obtained from the reference approved by IDEM, OAM.
  - (2) Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA approved form, emission factors shall be taken from the following reference approved by IDEM, OAM: "CFA Emission Models for the Reinforced Plastics Industries," Composites Fabricators Association, February 29, 1998, or its updates. For the purposes of these emission calculations, monomer in resins and gel coats that is not styrene shall be considered as styrene on an equivalent basis.

#### D.3.2 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the surface coating operations and the sanding operation 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 60,000 pounds per hour shall be accomplished by use of the equation:

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

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

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

#### D.3.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

### **Compliance Determination Requirements**

#### D.3.4 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the volatile organic compound and particulate matter limits specified in Conditions D.3.1 and D.3.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

#### D.3.5 VOC Emissions

Compliance with Condition D.3.1 shall be demonstrated at the end of each month based on the total volatile organic compound usage for the most recent 12 consecutive month period.

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

#### D.3.6 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the fiberglass operations stacks (E1 and E2) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

#### D.3.7 Particulate Matter (PM) [326 IAC 6]

Pursuant to 326 IAC 6 and CP No. 039-5284-00097, issued on July 21, 1996, the particulate matter overspray from the surface coating facilities shall be considered in compliance with 326 IAC 6 provided that the overspray is not:

- (a) visibly detectable at the exhaust,
- (b) accumulated on the rooftops or on the ground, or
- (c) causing any nuisance problems.

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

#### **D.3.8 Record Keeping Requirements**

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- (a) To document compliance with Condition D.3.1, 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.3.1.
  - (1) The amount and VOC content by weight of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
  - (2) A log of the dates of use;
  - (3) The cleanup solvent usage for each month;
  - (4) The total VOC usage for each month; and
  - (5) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.3.2, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### **D.3.9 Reporting Requirements**

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Reports shall be submitted upon request.

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

**PART 70 OPERATING PERMIT  
CERTIFICATION**

Source Name: J.B. Pointdexter & Company, Inc., dba Leer, Inc., dba Leer Midwest  
Source Address: 58288 Ventura Drive and 28858 Ventura Drive, Elkhart, Indiana 46517  
Mailing Address: 58288 Ventura Drive, Elkhart, Indiana 46517  
Part 70 Permit No.: T039-7561-00097

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Date:

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

**PART 70 OPERATING PERMIT  
EMERGENCY/DEVIATION OCCURRENCE REPORT**

Source Name: J.B. Pointdexter & Company, Inc., dba Leer, Inc., dba Leer Midwest  
Source Address: 58288 Ventura Drive and 28858 Ventura Drive, Elkhart, Indiana 46517  
Mailing Address: 58288 Ventura Drive, Elkhart, Indiana 46517  
Part 70 Permit No.: T039-7561-00097

**This form consists of 2 pages**

**Page 1 of 2**

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

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

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

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

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**

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

Source Name: J.B. Pointdexter & Company, Inc., dba Leer, Inc., dba Leer Midwest  
Source Address: 58288 Ventura Drive and 28858 Ventura Drive, Elkhart, Indiana 46517  
Mailing Address: 58288 Ventura Drive, Elkhart, Indiana 46517  
Part 70 Permit No.: T039-7561-00097

**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 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.**

<b>Compliance Monitoring Requirement (e.g. Permit Condition D.1.3)</b>	<b>Number of Deviations</b>	<b>Date of each Deviation</b>

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

Attach a signed certification to complete this report.

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

**Part 70 Quarterly Report**

Source Name: J.B. Pointdexter & Company, Inc., dba Leer, Inc., dba Leer Midwest  
Source Address: 58288 Ventura Drive and 28858 Ventura Drive, Elkhart, Indiana 46517  
Mailing Address: 58288 Ventura Drive, Elkhart, Indiana 46517  
Part 70 Permit No.: T039-7561-00097  
Facility: Booths B4, B5, and B6  
Parameter: Volatile Organic Compounds  
Limit: 3.25 tons per month, based on the most recent approved emission factors

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

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

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

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

#### Source Background and Description

**Source Name:** J. B. Pointdexter & Company, Inc., dba Leer, Inc.,  
dba Leer Midwest  
**Source Location:** 58288 Ventura Drive and 28858 Ventura Drive,  
Elkhart, Indiana 46517  
**County:** Elkhart  
**SIC Code:** 3792  
**Operation Permit No.:** T039-7561-00097  
**Permit Reviewer:** Angie Lee

The Office of Air Management (OAM) has reviewed a Part 70 permit application from J. B. Pointdexter & Company, Inc., dba Leer, Inc., dba Leer Midwest relating to the manufacturing and coating of fiberglass reinforced pickup truck caps and tonneau covers.

#### Source Definition

This manufacturing and coating of fiberglass reinforced pickup truck caps and tonneau covers manufacturing plant consists of three (3) plants:

- (1) Plant 1 and Plant 2 are located at 58288 Ventura Drive; and
- (2) Plant 3 is located at 28858 Ventura Drive.

Since the three (3) plants are located in contiguous properties, have the same SIC codes and are owned by one (1) company, they will be considered one (1) source.

For tracking purposes, these three (3) plants have been assigned Plant ID No. 039-00097.

#### Permitted Emission Units and Pollution Control Equipment

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

##### **Plant 1: 58288 Ventura Drive**

- (1) One (1) mold preparation operation, identified as Plant 1, with a maximum capacity to coat 10.0 fiberglass molds per hour.
- (2) Two (2) HVLP gelcoat booths, identified as Plant 1, with a maximum capacity to coat 10.0 fiberglass molds per hour, using dry filters to control particulate matter emissions, exhausting to stacks E 8-1 and E9-1.

- (3) Two (2) chop booths (laminating process), identified as Plant 1, with a maximum capacity to laminate 10.0 fiberglass molds per hour, using dry filters to control particulate matter emissions, exhausting to stacks E 6-1 and E7-1.
- (4) One (1) hand wipe and HVLP final finish and liner insert operation, identified as Plant 1, with a maximum capacity of 10.0 fiberglass truck covers per hour, using dry filters for the HVLP process to control particulate matter emissions, exhausting to a vent (fugitive).
- (5) Two (2) HVLP paint booths (prep. and paint process), identified as Plant 1, with a maximum capacity of 10.0 fiberglass truck covers per hour, using dry filters to control particulate matter emissions, exhausting to stacks E1-1, E2-1, E3-1, E4-1, and E5-1.
- (6) One (1) handgrinding operation, identified as Plant 1, with a maximum capacity to grind 1189.15 pounds of fiberglass truck covers per hour, using a baghouse to control particulate matter emissions, exhausting to stack P1-1.
- (7) Two (2) above ground resin storage tanks, identified as Tank 1 and Tank 2, each with an annual throughput of 130,000 gallons per year (each tank has a capacity of 5,000 gallons). Tank 1 was constructed in 1981 and Tank 2 was constructed in 1982.

**Plant 2: 58288 Ventura Drive**

- (8) One (1) airless application gelcoat booth, identified as B1, with a maximum capacity to coat 12.5 fiberglass molds per hour, using dry filters to control particulate matter emissions, exhausting to stacks V1, V2, V3, and V4.
- (9) Two (2) HVLP laminating booths, identified as B2 and B3, each with a maximum capacity to laminate 12.5 gelcoated molds per hour, using dry filters to control particulate matter emissions, with B2 exhausting to stacks V5, V6, V7, and V8 and B3 exhausting to stacks V9, V10, V11, and V12.
- (10) One (1) hand application touch-up booth, identified as B4, with a maximum capacity to coat 12.5 laminated parts per hour, exhausting to stacks PV1, PV2, and PV3.
- (11) Two (2) HVLP coating booths, identified as B5 and B6, each with a maximum capacity to coat 12.5 laminated parts per hour, using dry filters to control particulate matter emissions, with B5 exhausting to stacks V13, V14, V15, and V16 and B6 exhausting to V17, V18, V19, and V20.
- (12) One (1) fiberglass parts grinding operation, identified as Plant 2, with a maximum capacity to machine 384.5 pounds of fiberglass parts per hour, using a dust collector to control particulate matter emissions, exhausting to stack BH-1.

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- (13) One (1) air-assisted airless laminating booth, identified as E1, with a maximum capacity to laminate 0.05 fiberglass molds per hour, using dry filters to control particulate matter emissions, exhausting to stack E1.
- (14) One (1) air-assisted airless gelcoating booth, identified as E2, with a maximum capacity to coat 0.05 fiberglass molds per hour, using dry filters to control particulate matter emissions, exhausting to E2.

- (15) One (1) final finish operation, identified as Mold and FF, with a maximum capacity of 0.05 fiberglass molds per hour.
- (16) One (1) sanding operation, identified as Plant 3, with a maximum capacity to sand 50 pounds of fiberglass mold per hour, using a cloth filter to control particulate matter emissions, exhausting to stacks GV1 and GV2.

### **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(20):

#### **Plant 1: 58288 Ventura Drive**

- (1) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.
- (2) Application of oils, greases, lubricants, or other nonvolatile materials applied as temporary protective coatings.
- (3) Any operation using aqueous solutions containing less than 1% by weight of VOCs, excluding HAPs.
- (4) Water based adhesives that are less than or equal to 5% by volume of VOCs, excluding HAPs.
- (5) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone.
- (6) Paved and unpaved roads and parking lots with public access.
- (7) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.

#### **Plant 2: 58288 Ventura Drive**

- (1) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.
- (2) Degreasing operation that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.

- (3) Paved and unpaved roads and parking lots with public access.
- (4) Other activities or categories not previously identified:  
Insignificant Thresholds: Activities with emissions equal to or less than thresholds require listing only.

Lead (Pb) = 0.6 ton/year or 3.29 lbs/day  
Sulfur Dioxide (SO<sub>2</sub>) = 5 lbs/hr or 25 lbs/day  
Nitrogen Oxides (NO<sub>x</sub>) = 5 lbs/hr or 25 lbs/day  
Particulate Matter (PM) = 5 lbs/hr or 25 lbs/day  
Carbon monoxide (CO) = 25 lbs/day  
Volatile Organic Compounds (VOC) = 3 lbs/hr or 15 lbs/day

- (a) Three (3) parts washers
  - (i) PW1 - VOC PTE - 1.8 tons per year
  - (ii) PW2 - VOC PTE - 1.3 tons per year
  - (iii) PW3 - VOC PTE - 1.3 tons per year

**Plant 3: 28858 Ventura Drive**

- (1) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.
- (2) Infrared cure equipment.
- (3) Paved and unpaved roads and parking lots with public access.
- (4) Blowdown for any of the following: sight glass, boiler, compressors, pumps, and cooling tower.

**Existing Approvals**

The source has been operating under the following approvals:

- (1) CP# 039-00097, issued on October 25, 1991;
- (2) CP # 039-3529-00097, issued on July 26, 1994;
- (3) CP # 039-3054-00097, issued on August 2, 1994; and
- (4) CP # 039-5284-00097, issued on July 21, 1996.

None of the above air approvals are PSD permits.

**Enforcement Issue**

There are no Enforcement actions pending.

**Recommendation**

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

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

An administratively incomplete Part 70 permit application for the purposes of this review was received on December 13, 1996.

A Notice of Completeness letter was mailed to J. B. Pointdexter & Company, Inc., dba Leer, Inc., dba Leer Midwest on December 10, 1996.

## Emission Calculations

### Potential Emissions

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

Pollutant	Potential Emissions (tons/year)
PM	greater than 250
PM-10	greater than 250
SO <sub>2</sub>	less than 100
VOC	greater than 250
CO	less than 100
NO <sub>x</sub>	less than 100

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

HAP's	Potential Emissions (tons/year)
Styrene	greater than 10
Glycol Ether	greater than 10
Ethyl Benzene	less than 10
Toluene	greater than 10
Methyl Ethyl Ketone	greater than 10
Xylene	greater than 10
Methyl Isobutyl Ketone	less than 10
Antimony Compounds	greater than 10
Dimethyl Phthalate	less than 10
Methyl Methacrylate	less than 10
Methanol	less than 10
Cumene	less than 10
<b>TOTAL</b>	<b>503.87</b>

- (a) The potential emissions (as defined in the Indiana Rule) of particulate matter, PM10, and volatile organic compounds are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential emissions (as defined in Indiana Rule) of any single HAP is equal to or greater than ten (10) tons per year and the potential emissions (as defined in Indiana Rule) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

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

### Actual Emissions

The following table shows the actual emissions from the source. This information reflects the OAM 1995 emission data.

Pollutant	Actual Emissions (tons/year)
PM	less than 100
PM-10	less than 100
SO <sub>2</sub>	less than 100
VOC	greater than 100, less than 250
CO	less than 100
HAP (specify)	not available
NO <sub>x</sub>	less than 100

### County Attainment Status

The source is located in Elkhart County.

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

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 attainment or unclassifiable for ozone.

### Part 70 Permit Conditions

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

- (1) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.
- (2) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

### **Federal Rule Applicability**

- (a) There are no New Source Performance Standards (326 IAC 12) applicable to this source.
- (b) The degreasing operation listed on the Insignificant Activities form is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR Part 63, Subpart T, (Halogenated Solvent Cleaning Machine NESHAP) because it uses a petroleum solvent which is not part of the applicability as specified in 40 CFR Part 63, Subpart T.

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

#### **326 IAC 2-2 (PSD rules)**

This source is a major source but did not go through PSD review due to the following:

- (a) The existing facilities located at Plant 1 are not subject to PSD requirements because Plant 1 was constructed prior to August 7, 1977; and
- (b) Pursuant to CP No. 039-5284-00097, issued on July 21, 1996, the PSD rules will not apply if the input volatile organic compounds delivered to the applicators of Booths B1, B2, B3, B4, B5, and B6, and the final finish booth, including clean-up solvents shall be limited, in total, to 3.25 tons per month, based on a 35% and 13% flash-off for gelcoat and lamination coating operations located at Plant 2.

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

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than ten (10) tons per year of particulate matter, PM10, and volatile organic compounds. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

#### **326 IAC 5-1 (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**

#### **Plant 1: 58288 Ventura Drive**

##### **326 IAC 2-2 (PSD Rules)**

Pursuant to 326 IAC 2 and CP No. 039-00097, issued on October 25, 1991, the existing facilities located at Plant 1 are not subject to PSD requirements because Plant 1 was constructed prior to August 7, 1977.

326 IAC 8-1-6 (BACT)

Pursuant to 326 IAC 8-1-6, BACT is not subject to the surface coating operations, even though potential VOC emissions are greater than 25 tons per year, because Plant 1 was constructed prior to January 1, 1980.

326 IAC 8-6 (Organic solvent emission limitations)

Pursuant to 326 IAC 8-6, Organic solvent emission limitations, the surface coating operations are not applicable to the requirements because the source was constructed prior to January 1, 1980.

326 IAC 6 (Particulate Rules)

Pursuant to 326 IAC 6 and CP No. 039-00097, issued on October 25, 1991, the particulate matter overspray from the surface coating facilities shall be considered in compliance with 326 IAC 6 provided that the overspray is not:

- (a) visibly detectable at the exhaust,
- (b) accumulated on the rooftops or on the ground, or
- (c) causing any nuisance problems.

326 IAC 6-3-2 (Process operations: particulate emission limitations)

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the trimmers, grinding, and machining equipment 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 60,000 pounds per hour shall be accomplished by use of the equation:

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

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

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

In order for this source to be in compliance with 326 IAC 6-3-2, the baghouse shall be in operation at all times that the trimmers, grinding, and machining equipment are in operation.

**Plant 2: 58288 Ventura Drive**

326 IAC 2-2 (PSD Rules)

Pursuant to 326 IAC 2-2 and 40 CFR 52.21 and CP No. 039-5284-00097, issued on July 21, 1996, the PSD rules will not apply because the input volatile organic compounds delivered to the applicators of Booths B1, B2, B3, B4, B5, and B6, and the final finish booth, including clean-up solvents shall be limited, in total, to 3.25 tons per month (equivalent to 39 tons per year), based on a 35% and 13% flash-off for gelcoat and lamination coating operations.

326 IAC 8-1-6 (BACT)

Pursuant to 326 IAC 8-1-6 and CP No. 039-5284-00097, issued on July 21, 1996, Booths B1, B2, B3, B4, B5, B6, and the final finish booth shall use Best Available Control Technology (BACT). The BACT determined for these facilities are:

- (a) The use of an airless application system for Booth B1;

- (b) The use of High Volume Low Pressure (HVLP) application systems for Booths B2, B3, B5, and B6;
- (c) Hand application method for Booth B4 and the final finish booth;
- (d) The airless applicators shall be used at all times during which Booth B1 is operated;
- (e) The HVLP applicators shall be used at all times during which Booths B2, B3, B5, and B6 are operated; and
- (f) Hand applicators shall be used at all times during which Booths B4 and the final finish booth are operated.

326 IAC 8-3-5(a) (Cold cleaner degreaser operation and control)

Pursuant to 326 IAC 8-3-5(a) (Cold cleaner degreaser operation and control), the owner or operator of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:

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

Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:

- (1) Close the cover whenever articles are not being handled in the degreaser.
- (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
- (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

**326 IAC 6 (Particulate Rules)**

Pursuant to 326 IAC 6 and CP No. 039-5284-00097, issued on July 21, 1996, the particulate matter overspray from the surface coating facilities shall be considered in compliance with 326 IAC 6 provided that the overspray is not:

- (a) visibly detectable at the exhaust,
- (b) accumulated on the rooftops or on the ground, or
- (c) causing any nuisance problems.

**326 IAC 6-3-2 (Process operations: particulate emission limitations)**

Pursuant to 326 IAC 6-3-2 (Process Operations) and CP No. 039-5284-00097, issued on July 21, 1996, the actual PM emission rate from the fiberglass grinding operations shall not exceed the allowable emission rate of 6.24 pounds per hour.

In order to avoid the requirements of PSD, the annual PM emission rate from the fiberglass grinding operations shall be less than 25 tons per year and the annual PM10 emission rate shall be less than 15 tons per year.

**326 IAC 6-4 (Fugitive dust emissions),**

Pursuant to 326 IAC 6-4 (Fugitive dust emissions) the Permittee shall be in violation of 326 IAC 6-4 (Fugitive Dust Emissions) if any of the criteria specified in 326 IAC 6-4-2(1) through (4) are violated. Observations of visible emissions crossing the property line of the source at or near ground level must be made by a qualified representative of IDEM. [326 IAC 6-4-5(c)].

**Plant 3: 28858 Ventura Drive**

**326 IAC 2-2 (PSD rules)**

Pursuant to 326 IAC 2-2, the requirements of PSD are not applicable to the facilities at Plant 3 because the volatile organic compound emissions are less than 25 tons per year.

**326 IAC 8-1-6 (BACT)**

Pursuant to 326 IAC 8-1-6 and CP No. 039-3054-00097, issued on August 2, 1994, the records of the surface coating quantities and organic solvent contents shall be maintained for a minimum period of 24 months and made available upon request of the Office of Air Management. Any change or modification which may increase potential emissions to 25 tons per year from the equipment covered in this permit shall obtain a prior approval pursuant to 326 IAC 8-1-6 before such change may occur.

### 326 IAC 6 (Particulate Rules)

Pursuant to 326 IAC 6 and CP No. 039-3054-00097, issued on August 2, 1994, the particulate matter overspray from the surface coating facilities shall be considered in compliance with 326 IAC 6 provided that the overspray is not:

- (a) visibly detectable at the exhaust,
- (b) accumulated on the rooftops or on the ground, or
- (c) causing any nuisance problems.

### 326 IAC 6-3-2 (Process operations: particulate emission limitations)

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the sanding process, gelcoat booth, and lamination booth 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 60,000 pounds per hour shall be accomplished by use of the equation:

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

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

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

In order for this source to be in compliance with 326 IAC 6-3-2, the dry filters shall be in place at all times that the gelcoat and lamination booth are in operation. The baghouse shall be in operation at all times that the sanding equipment is in operation.

## Compliance Requirements

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

Compliance Determination Requirements in 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:

**Plant 1: 58288 Ventura Drive**

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 from the fiberglass operations and surface coating stacks (E8-1, E9-1, E6-1, E7-1, E1-1, E2-1, E3-1, E4-1, and E5-1) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a 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 a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

**Plant 2: 58288 Ventura Drive**

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 from the fiberglass operations and surface coating stacks (V1, V2, V3, V4, V5, V6, V7, V8, V9, V10, V11, V12, PV1, PV2, PV3, V13, V14, V15, V16, V17, V18, V19, V20) 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 a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Visible Emissions Notations:

- (a) Daily visible emission notations of the grinding stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

Parametric Monitoring:

The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the grinding operation, at least once weekly when the grinding operation is in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 1.0 and 3.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.

Broken Bag or Failure Detection:

In the event that bag failure has been observed:

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced.
- (b) Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion.

### **Plant 3: 28858 Ventura Drive**

#### **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 from the fiberglass operations stacks (E1 and E2) 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 a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

#### **Visible Emissions Notations:**

- (a) Daily visible emission notations of the sanding operation stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

#### **Particulate Matter (PM):**

Pursuant to 326 IAC 6-3-2, the cloth filter shall be operated at all times when the sanding equipment is in operation.

#### **Baghouse Inspections:**

An inspection shall be performed each calendar quarter of all bags controlling the sanding operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

**Broken Bag or Failure Detection:**

In the event that bag failure has been observed:

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced.
- (b) Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion.

**Air Toxic Emissions**

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

None of these listed air toxics will be emitted from this source.

- (a) This source will emit levels of air toxics greater than those that constitute major source applicability according to Section 112 of the Clean Air Act.
- (b) 326 IAC 2-1-3.4 (New source toxics control), is not applicable to this source because there are no new emission units.

**Conclusion**

The operation of this manufacturing and coating of fiberglass reinforced pickup truck caps and tonneau covers plant shall be subject to the conditions of the attached proposed **Part 70 Permit No. T039-7561-00097**.

## Indiana Department of Environmental Management Office of Air Management

### Addendum to the Technical Support Document for Part 70 Operating Permit

**Source Name:** J.B. Pointdexter & Company, Inc., dba Leer, Inc.,  
dba Leer Midwest  
**Source Location:** 58288 Ventura Drive and 28858 Ventura Drive,  
Elkhart, Indiana 46517  
**County:** Elkhart  
**SIC Code:** 3792  
**Operation Permit No.:** T039-7561-00097  
**Permit Reviewer:** Angie Lee / Catherine Moore

On October 29, 1997, the Office of Air Management (OAM) had a notice published in the Truth Publishing newspaper, Elkhart, Indiana, stating that J.B. Pointdexter & Company, Inc., dba Leer, Inc., dba Leer Midwest had applied for a Part 70 Operating Permit to operate a fiberglass reinforced pickup truck cap and tonneau cover manufacturing plant. The notice also stated that OAM proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Upon further review, OAM has made the following changes to the final Part 70 permit (~~strikeout~~ added to show what was deleted and **bold** added to show what has been added):

1. The name in the signature block on the cover page has been changed from "Felicia R. George" to "**Janet G. McCabe**".
2. The Source Summary under Section A has been changed to be as follows:

#### **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.**

3. Condition A.1 "General Information" has been changed to be as follows:

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

The Permittee owns and operates a stationary manufacturing and coating of fiberglass reinforced pickup truck caps and tonneau covers plant.

Responsible Official: ~~Dennis Jordan~~ **Renee Maear**  
Source Address: **Plants 1 and 2:** 58288 Ventura Drive and **Plant 3:** 28858 Ventura Drive, Elkhart, Indiana 46517  
Mailing Address: 58288 Ventura Drive, Elkhart, Indiana 46517  
SIC Code: 3792  
County Location: Elkhart

County Status: Attainment for all criteria pollutants  
Source Status: Part 70 Permit Program  
Major Source, under PSD Rules;  
Major Source, Section 112 of the Clean Air Act

4. In Section A.2 the plant addresses will be added next to "Plant 1", "Plant 2", and "Plant 3" for clarification. The same change will also be addressed for Section A.3 (Insignificant Activities) as well as for Section D (Facility Operation Conditions):

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

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

**Plant 1: 58288 Ventura Drive**

- (1) One (1) mold preparation operation, identified as Plant 1, with a maximum capacity to coat 10.0 fiberglass molds per hour.
- (2) Two (2) HVLP gelcoat booths, identified as Plant 1, with a maximum capacity to coat 10.0 fiberglass molds per hour, using dry filters to control particulate matter emissions, exhausting to stacks E 8-1 and E9-1.
- (3) Two (2) chop booths (laminating process), identified as Plant 1, with a maximum capacity to laminate 10.0 fiberglass molds per hour, using dry filters to control particulate matter emissions, exhausting to stacks E 6-1 and E7-1.
- (4) One (1) hand wipe and HVLP final finish and liner insert operation, identified as Plant 1, with a maximum capacity of 10.0 fiberglass truck covers per hour, using dry filters for the HVLP process to control particulate matter emissions, exhausting to a vent (fugitive).
- (5) Two (2) HVLP paint booths (prep. and paint process), identified as Plant 1, with a maximum capacity of 10.0 fiberglass truck covers per hour, using dry filters to control particulate matter emissions, exhausting to stacks E1-1, E2-1, E3-1, E4-1, and E5-1.
- (6) One (1) handgrinding **and water jet cutter** operation, identified as Plant 1, with a maximum capacity to grind 1189.15 pounds of fiberglass truck covers per hour, using a baghouse to control particulate matter emissions, exhausting to stack P1-1.
- (7) Two (2) above ground resin storage tanks, identified as Tank 1 and Tank 2, each with an annual throughput of 130,000 gallons per year (each tank has a capacity of 5,000 gallons). Tank 1 was constructed in 1981 and Tank 2 was constructed in 1982.

**Plant 2: 58288 Ventura Drive**

- ~~(8) One (1) airless application gelcoat booth, identified as B1, with a maximum capacity to coat 12.5 fiberglass molds per hour, using dry filters to control particulate matter emissions, exhausting to stacks V1, V2, V3, and V4.~~
- ~~(9) Two (2) HVLP laminating booths, identified as B2 and B3, each with a maximum capacity to laminate 12.5 gelcoated molds per hour, using dry filters to control particulate matter emissions, with B2 exhausting to stacks V5, V6, V7, and V8 and B3 exhausting to stacks V9, V10, V11, and V12.~~

- ~~(10)~~**(8)** One (1) hand application touch-up ~~booth area~~, identified as B4, with a maximum capacity to coat 12.5 laminated parts per hour, exhausting to stacks PV1, PV2, and PV3.
- ~~(11)~~**(9)** Two (2) HVLP coating booths, identified as B5 and B6, each with a maximum capacity to coat 12.5 laminated parts per hour, using dry filters to control particulate matter emissions, with B5 exhausting to stacks V13, V14, V15, and V16 and B6 exhausting to V17, V18, V19, and V20.
- ~~(12)~~**(10)** One (1) fiberglass parts grinding operation, identified as Plant 2, with a maximum capacity to machine 384.5 pounds of fiberglass parts per hour, using ~~a dust collector~~ **dry filters** to control particulate matter emissions, exhausting to stack BH-1.

**Plant 3: 28858 Ventura Drive**

- ~~(13)~~**(11)** One (1) air-assisted airless laminating ~~booth area~~, identified as E1, with a maximum capacity to laminate 0.05 fiberglass molds per hour, using dry filters to control particulate matter emissions, exhausting to stack E1.
- ~~(14)~~**(12)** One (1) air-assisted airless gelcoating booth, identified as E2, with a maximum capacity to coat 0.05 fiberglass molds per hour, using dry filters to control particulate matter emissions, exhausting to E2.
- ~~(15)~~**(13)** One (1) final finish operation, identified as Mold and FF, with a maximum capacity of 0.05 fiberglass molds per hour.
- ~~(16)~~**(14)** One (1) sanding operation, identified as Plant 3, with a maximum capacity to sand 50 pounds of fiberglass mold per hour, using a cloth filter to control particulate matter emissions, exhausting to stacks GV1 and GV2.

5. Condition A.4 "Part 70 Permit Applicability" has been changed to be as follows:

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

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

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).**

6. Condition A.5 "Prior Permit Conditions Superseded" has been deleted from the final permit as follows:

~~A.5 Prior Permit Conditions Superseded [326 IAC 2]~~

~~The terms and conditions of this permit incorporate all the current applicable requirements for all emission units located at this source, and supersede all terms and conditions in all registrations and permits, including construction permits, issued prior to the date of issuance of this permit. All terms and conditions in such registrations and permits are no longer in effect.~~

7. Condition B.1(b) "Permit No Defense" has been changed to be as follows:

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

- (a) Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7.
- (b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-1-3.2 or 326 IAC 2-7-15, **as set out in this permit in the Section B condition entitled "Permit Shield."**

8. Condition B.8(c) "Duty to Supplement and Provide Information" has been changed to be as follows:

- (c) Upon request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit. ~~For information claimed to be confidential, If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, 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, then** 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.

~~Such confidentiality claim shall meet the requirements of 40 CFR 2, Subpart B (when submitting to U.S. EPA) and 326 IAC 17 (when submitting to IDEM, OAM).~~

9. Condition B.11 "Annual Compliance Certification" has been changed to be as follows:

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

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

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
- (1) The identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was **based on** continuous or intermittent **data**;
  - (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); ~~and~~
  - (5) Any insignificant activity that has been added without a permit revision; and**
  - ~~(5)(6)~~ Such other facts, as specified in Sections D of this permit, as IDEM, OAM, may require to determine the compliance status of the source.

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

10. Condition B.12 "Preventive Maintenance Plan" has been changed to be as follows:

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

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (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.

11. Condition B.14 "Permit Shield" has been changed to be as follows:

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

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

~~(a)~~ **(b) This permit shall be used as the primary document for determine compliance with applicable requirements established by previously issued permits.**

Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided ~~that either of the following:~~

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

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

~~(b)~~ **(c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.**

~~(e)~~ **(d) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement, IDEM, OAM shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order. No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application.**

~~(d)~~ **(e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:**

(1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

- (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
  - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
  - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- ~~(e)~~ (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- ~~(f)~~ (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM has issued the modifications. [326 IAC 2-7-12(c)(7)]
- ~~(g)~~ (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM has issued the modification. [326 IAC 2-7-12(b)(8)]
12. Condition B.16 "Deviations from Permit Requirements and Conditions" has been changed to be as follows:

B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

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

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

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

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

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

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

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

13. Condition B.18(a) “Permit Renewal” has been changed to be as follows:

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

14. Condition B.19 “Administrative Permit Amendment”, Condition B.20 “Minor Permit Modification”, and Condition B.21 “Significant Permit Modification” have all been combined into one condition numbered Condition B.19 “Permit Amendment or Modification” as follows. The remaining conditions of this section have been renumbered:

~~B.19 Administrative Permit Amendment [326 IAC 2-7-11]~~

~~(a) An administrative permit amendment is a Part 70 permit revision that makes changes of the type specified under 326 IAC 2-7-11(a).~~

~~(b) An administrative permit amendment may be made by IDEM, OAM consistent with the procedures specified under 326 IAC 2-7-11(c).~~

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

~~B.20 Minor Permit Modification [326 IAC 2-7-12]~~

~~(a) A permit modification is any revision to this permit that cannot be accomplished as an administrative permit amendment under 326 IAC 2-7-11.~~

~~(b) Minor modification to this permit shall follow the procedures specified under 326 IAC 2-7-12(b), except as provided by 326 IAC 2-7-12(c).~~

~~(c) An application requesting the use of minor modification procedures shall meet the requirements of 326 IAC 2-7-12(b) and shall include the information required in 326 IAC 2-7-12(b)(3)(A) through (E).~~

~~(d) The Permittee may make the change proposed in its minor permit modification application immediately after it files such application provided that the change has received any approval required by 326 IAC 2-1. After the Permittee makes the change allowed under minor permit modification procedures, and until IDEM, OAM takes any of the actions specified in 326 IAC 2-7-12(b)(3)(A) through (C), the Permittee must comply with both the applicable requirements governing the change and the proposed permit terms and conditions. During this period, the Permittee need not comply with the existing permit terms and conditions it seeks to modify. If the Permittee fails to comply with its proposed permit terms and conditions during this time period, the existing permit terms and conditions it seeks to modify may be enforced against it. [326 IAC 2-7-12(b)(7)]~~

~~B.21 Significant Permit Modification [326 IAC 2-7-12(d)]~~

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- ~~(a) Significant modification procedures shall be used for applications requesting permit modifications that do not qualify as minor permit modifications or as administrative amendments.~~
- ~~(b) Every significant change in existing monitoring permit terms or conditions and every relaxation of reporting or record keeping permit terms or conditions of this permit shall be considered significant.~~
- ~~(c) Nothing in 326 IAC 2-7-12(d) shall be construed to preclude the Permittee from making changes consistent with 326 IAC 2-7 that would render existing permit compliance terms and conditions irrelevant.~~
- ~~(d) Significant modifications of this permit shall meet all requirements of 326 IAC 2-7, including those for application, public participation, review by affected states, review by the U.S. EPA, and availability of the permit shield, as they apply to permit issuance and renewal.~~

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

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- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.**
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:**  
  
**Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015**  
  
**Any such application should be certified by the “responsible official” as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule.**
- (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]**

15. Condition B.26 (now renumbered Condition B.24) “Inspection and Entry” has been changed to be as follows:

~~B.2624~~ **Inspection and Entry [326 IAC IAC 2-7-6(2)]**

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

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.  
[326 IAC 2-7-6(6)]

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

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

16. Condition B.27(b) (now renumbered Condition B.25(b)) "Transfer of Ownership or Operation" has been changed to be as follows:

- (b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11. **The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).**

17. Condition B.28 (now renumbered Condition B.26) "Annual Fee Payment" has been changed to be as follows:

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

- (a) The Permittee shall pay annual fees to IDEM, OAM within thirty (30) calendar days of receipt of a billing. ~~or in a time period consistent with the fee schedule established in 326 IAC 2-7-19. If the Permittee does not receive a bill from IDEM, OAM the applicable fee is due April 1 of each year.~~
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) ~~If the Permittee does not receive a bill from IDEM, OAM, thirty (30) calendar days before the due date,~~ The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee. ~~The applicable fee is due April 1 of each year.~~

18. Condition C.1 "Major Source" has been deleted from the final permit as follows. The remaining conditions of this section have been renumbered:

~~C.1 Major Source~~

~~Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration), this source is a major source.~~

19. Condition C.1 "Particulate Matter Emission Limitations for Processes with Process Weight Rates Less Than One Hundred pounds per hour" has been added to the permit as follows. The remaining conditions of this section have been renumbered:

**C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]**

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

20. Condition C.2 "Opacity" has been changed to be as follows:

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

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

- (a) ~~Visible emissions Opacity~~ shall not exceed an average of forty percent (40%) ~~opacity~~ in ~~twenty four (24) consecutive readings~~ **any one (1) six minute averaging period**, as determined in 326 IAC 5-1-4.
- (b) ~~Visible emissions Opacity~~ shall not exceed sixty percent (60%) ~~opacity~~ for more than a cumulative total of fifteen (15) minutes (sixty (60) readings **as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor**) in a six (6) hour period.

~~This condition is not federally enforceable.~~

21. Condition C.3 "Open Burning" has been changed to be as follows:

**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. ~~This condition is not federally enforceable.~~ **326 IAC 4-1-3(a)(2)(A) and (B) are not federally enforceable.**

22. Condition C.4 "Incineration" has been changed to be as follows:

**C.4 Incineration [326 IAC 4-2][326 IAC 9-1-2]**

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

23. Condition C.5 "Fugitive Dust Emissions" has been changed to be as follows:

**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). ~~Rule 326 IAC 6-4-2(4) regarding visible dust is not federally enforceable.~~

24. Condition C.6 "Operation of Equipment" has been changed to be as follows:

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

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

25. Condition C.7 "Asbestos Abatement Projects- Accreditation" and Condition C.13 "Asbestos Abatement Projects" have been combined into one condition as follows:

~~C.7 Asbestos Abatement Projects - Accreditation [326 IAC 14-10] [326 IAC 18]  
[40 CFR 61, Subpart M]~~

~~Prior to the commencement of any demolition or renovation activities, the Permittee shall use an Indiana accredited asbestos inspector to inspect thoroughly the affected facility or part of the facility where the demolition or renovation operation will occur for the presence of asbestos, including Category I and Category II nonfriable asbestos containing material. The requirement that the inspector be accredited is federally enforceable.~~

**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.**

26. Condition C.8 "Performance Testing" has been changed to be as follows:

C.8 Performance Testing ~~[326 IAC 3-2-4]~~ [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC ~~3-2-4~~ 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).**

27. Condition C.9 "Compliance Schedule" has been changed from:

C.9 Compliance Schedule [326 IAC 2-7-6(3)]

The Permittee:

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

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

28. Condition C.10 "Compliance Monitoring" has been changed from:

C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

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

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

in writing, ~~no more than ninety (90) days after receipt of this permit, prior to the end of the initial ninety (90) day compliance schedule,~~ with full justification of the reasons for the inability to meet this date ~~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).

29. Condition C.15 (now renumbered Condition C.14) "Emergency Reduction Plans" has been changed to be as follows:

C.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015  
within ninety (90) days after the date of issuance of this permit.

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

- (c) If the ERP is disapproved by IDEM, OAM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP. ~~If after this time, the Permittee does not submit an approvable ERP, then IDEM, OAM, shall supply such a plan.~~
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAM, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

30. Condition C.16 (now renumbered Condition C.15) "Risk Management Plan" has been changed to be as follows:

**~~C.4615~~ Risk Management Plan [326 IAC 2-7-5(12)] [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).**

31. The title of Condition C.17 (now renumbered Condition C.16) "Compliance Monitoring Plan" has been changed to be as follows:

**~~C.4716~~ Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5(9)] [326 IAC 2-7-6] [326 IAC 1-6]**

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32. Condition C.18 (now renumbered Condition C.17) "Actions Related to Noncompliance Demonstrated by a Stack Test " has been changed to be as follows:

**~~C.4817~~ Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]**

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- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate 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).**

33. Condition C.19 (now renumbered Condition C.18) “Emission Statement” has been changed to be as follows:

**C.1918 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]**

- (a) The Permittee shall submit ~~a certified,~~ **an annual emission statement certified pursuant to the requirements of 326 IAC 2-6**, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
- (1) ~~Contain~~ **Indicate** actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
  - (2) ~~Contain~~ **Indicate** actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:
- Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015
- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

34. The title and subsection (a) of Condition C.21 (now renumbered Condition C.20) “General Record Keeping Requirements” has been changed to be as follows:

**C.2120 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]**

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location **for a minimum of three (3) years** and available ~~within one (1) hour upon verbal~~ **upon 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 ~~providing they are made available within thirty (30) days after written request.~~ **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.**

35. Condition C.22 (now renumbered Condition C.21) "General Reporting Requirements" has been changed from:

**C.2221 General Reporting Requirements [326 IAC 2-7-5(3)(C)]**

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported.**
- ~~(a)(b) Reports required by conditions in Section D of this permit shall be submitted to: 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
- ~~(b)(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.~~
- ~~(e)(d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period.~~
- ~~(d) All instances of deviations must be clearly identified in such reports. A reportable deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:~~
- ~~(1) an excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or~~
- ~~(2) an emergency as defined in 326 IAC 2-7-1(12); or~~
- ~~(3) failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation;~~
- ~~(4) failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.~~
- ~~A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred or failure to monitor or record the required compliance monitoring is a deviation.~~
- (e) All instances of deviations as described in Section B - Deviations from Permit Requirements Conditions must be clearly identified in such reports.**
- ~~(e)(f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.~~
- ~~(f)(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).**

36. The following sentence was added to the equipment listing in Sections D.1, D.2, and D.3 “FACILITY OPERATION CONDITIONS”

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

37. The equipment listed in Section D.1(6) “FACILITY OPERATION CONDITIONS” has been changed to be as follows:
- (6) One (1) handgrinding **and water jet cutter** operation, identified as Plant 1, with a maximum capacity to grind 1189.15 pounds of fiberglass truck covers per hour, using a baghouse to control particulate matter emissions, exhausting to stack P1-1.
38. Condition D.1.1 “Volatile Organic Compound” has been deleted from the final permit as follows. The remaining conditions of this section have been renumbered:

~~D.1.1 Volatile Organic Compounds (VOC) [326 IAC 2-2 and 326 IAC 8-1-6]  
Pursuant to 326 IAC 2-2 (PSD) and 326 IAC 8-1-6 (BACT).~~

- ~~(a) Plant 1 is not applicable to the requirements of 326 IAC 2-2 (PSD) and 326 IAC 8-1-6 (BACT) because it was constructed prior to August 7, 1977.~~
- ~~(b) Any change or modification which may increase potential emissions to either 25 tons per year for BACT and/or 39 tons per year for PSD from the equipment covered in this permit shall obtain a permit pursuant to 326 IAC 2-2 and/or 8-1-6 before such change may occur.~~

39. Condition D.1.3 (now renumbered Condition D.1.2) “Preventive Maintenance Plan” has been changed to be as follows:

~~D.1.32 Preventive Maintenance Plan [326 IAC 2-7-4(c)(9)]~~ **326 IAC 2-7-5(13)**

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

40. Condition D.1.4 (now renumbered Condition D.1.3) “Testing Requirements” has been changed to be as follows:

~~D.1.43 Testing Requirements [326 IAC 2-7-6(1),(6)]~~

**The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance.** If testing is required by IDEM, compliance with the particulate matter limit specified in Condition D.1.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. ~~Testing of this facility is not specifically required by this permit. However, this does not preclude testing requirements on this facility under 326 IAC 2-7-5 and 326 IAC 2-7-6.~~

41. Condition D.1.5 (now renumbered Condition D.1.4) “Monitoring” has been changed to be as follows:

#### D.1.54 Monitoring

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- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, ~~daily~~ **weekly** observations shall be made of the overspray **from the fiberglass operations and surface coating stacks (E8-1, E9-1, E6-1, E7-1, E1-1, E2-1, E3-1, E4-1, and E5-1)** while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) ~~Weekly~~ **Monthly** inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when ~~an~~ **a noticeable change in** overspray emission, **or** evidence of overspray emission ~~, or other abnormal emission~~ is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

42. Condition D.1.7 (now renumbered Condition D.1.6) "Record Keeping Requirements" has been changed to be as follows:

#### D.1.76 Record Keeping Requirements

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

~~(2) A log of the dates of use;~~

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

~~(4) The cleanup solvent usage for each month;~~

~~(5) The total VOC usage for each month; and~~

~~(6) The weight of VOCs emitted for each compliance period.~~

~~(b)~~**(a)** To document compliance with Condition D.1.1, the Permittee shall maintain a log of ~~daily~~ **weekly** overspray observations, daily and ~~weekly~~ **monthly** inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

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

43. Condition D.1.8 "Reporting Requirements" has been deleted from the final permit as follows:

~~D.1.8 Reporting Requirements~~

~~Reports shall be submitted upon request.~~

44. The equipment listed in Section D.2 "FACILITY OPERATION CONDITIONS" has been changed to be as follows:

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

**Plant 2: 58288 Ventura Drive**

~~(0)~~ One (1) airless application gelcoat booth, identified as B1, with a maximum capacity to coat 12.5 fiberglass molds per hour, using dry filters to control particulate matter emissions, exhausting to stacks V1, V2, V3, and V4.

~~(0)~~ Two (2) HVLP laminating booths, identified as B2 and B3, each with a maximum capacity to laminate 12.5 gelcoated molds per hour, using dry filters to control particulate matter emissions, with B2 exhausting to stacks V5, V6, V7, and V8 and B3 exhausting to stacks V9, V10, V11, and V12.

~~(4)~~**(8)** One (1) hand application touch-up booth area, identified as B4, with a maximum capacity to coat 12.5 laminated parts per hour, exhausting to stacks PV1, PV2, and PV3.

~~(4)~~**(9)** Two (2) HVLP coating booths, identified as B5 and B6, each with a maximum capacity to coat 12.5 laminated parts per hour, using dry filters to control particulate matter emissions, with B5 exhausting to stacks V13, V14, V15, and V16 and B6 exhausting to V17, V18, V19, and V20.

~~(4)~~**(10)** One (1) fiberglass parts grinding operation, identified as Plant 2, with a maximum capacity to machine 384.5 pounds of fiberglass parts per hour, using ~~a dust collector~~ **dry filters** to control particulate matter emissions, exhausting to stack BH-1.

Insignificant Activity: Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.

45. Condition D.2.1 "Volatile Organic Compound" has been changed to be as follows:

D.2.1 Volatile Organic Compound (VOC) [326 IAC 2-2]

Pursuant to CP No. 039-5284-00097, issued on July 21, 1996, the input volatile organic compounds delivered to the applicators of Booths ~~B1, B2, B3,~~ B4, B5, and B6, ~~and the final finish booth,~~ including clean-up solvents shall be limited, in total, to 3.25 tons per month, ~~based on a 35% and 13% flash off for gelcoat and lamination coating operations.~~ Therefore 326 IAC 2-2 and 40 CFR 52.21 (PSD rules) does not apply.

46. Condition D.2.2 "Volatile Organic Compound" has been changed to be as follows:

D.2.2 Volatile Organic Compound (VOC) [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6 and CP No. 039-5284-00097, issued on July 21, 1996, Booths ~~B1, B2, B3,~~ B4, B5, B6, ~~and the final finish booth,~~ shall use Best Available Control Technology (BACT). The BACT determined for these facilities are:

~~(a)~~ The use of an airless application system for Booth ~~B1;~~

~~(b)~~**(a)** The use of High Volume Low Pressure (HVLP) application systems for Booths ~~B2, B3,~~ B5, and B6;

~~(c)~~**(b)** Hand application method for ~~Booth Area B4 and the final finish booth;~~

~~(d) The airless applicators shall be used at all times during which Booth B1 is operated;~~

~~(e)(c)~~ The HVLP applicators shall be used at all times during which Booths ~~B2, B3,~~ B5, and B6 are operated; and

~~(f)(d)~~ Hand applicators shall be used at all times during which ~~Booths Area B4 and the final finish booth~~ are operated.

47. Condition D.2.4 "Particulate Matter" has been changed to be as follows:

D.2.4 Particulate Matter (PM) [326 IAC 6-3-2(c)]

(a) Pursuant to 326 IAC 6-3 (Process Operations) and CP No. 039-5284-00097, issued on July 21, 1996, the ~~allowable~~ **actual** PM emission rate from the fiberglass grinding operations shall not exceed the allowable emission rate of 6.24 pounds per hour.

(b) In order to avoid the requirements of PSD, the annual PM emission rate from the fiberglass grinding operations shall be less than 25 tons per year and the annual PM10 emission rate shall be less than 15 tons per year.

48. Condition D.2.6 "Preventive Maintenance Plan" has been changed to be as follows:

D.2.6 Preventive Maintenance Plan [~~326 IAC 2-7-4(e)(9)~~ 326 IAC 2-7-5(13)]

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

49. Condition D.2.7 "Testing Requirements" has been changed to be as follows:

D.2.7 Testing Requirements [326 IAC 2-7-6(1),(6)]

**The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance.** If testing is required by IDEM, compliance with the particulate matter limit specified in Condition D.1.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. ~~Testing of this facility is not specifically required by this permit. However, this does not preclude testing requirements on this facility under 326 IAC 2-7-5 and 326 IAC 2-7-6.~~

50. Condition D.2.8 "VOC Emissions" has been added to the final permit as follows. The remaining conditions of this section have been renumbered:

D.2.8 VOC Emissions

**Compliance with Condition D.2.1 shall be demonstrated at the end of each month based on the total volatile organic compound usage for the most recent 12 consecutive month period.**

51. Condition D.2.8 (now renumbered Condition D.2.9) "Particulate Matter" has been changed to be as follows:

D.2.89 Particulate Matter (PM)

(a) Pursuant to CP-039-5284-00097, issued on June 2, 1995, the ~~baghouse~~ **dry filters** shall be operated at all times when the fiberglass grinding is in operation.

~~(b) The pressure drops from each facility shall be maintained within the range of 1.0 to 3.0 inches of water. If the water pressure drops fall outside of these ranges, corrective action will be taken in accordance with Leer Midwest, Inc. Operation, Maintenance and Fugitive Dust Plan as submitted to IDEM on February 1, 1996.~~

~~(c) The company shall document the cause of the out of range reading and take immediate action to correct any problem.~~

~~(d)~~(b) Failure or partial failure of control devices shall be reported to IDEM according to the procedure specified for malfunctions in 326 IAC 1-6-2, in which case the provisions of 326 IAC 1-6-5 may apply at the discretion of IDEM.

52. Condition D.2.9 (now renumbered Condition D.2.10) "Monitoring" has been changed to be as follows:

D.2.10 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, ~~daily~~ **weekly** observations shall be made of the overspray **from the fiberglass operations and surface coating stacks (PV1, PV2, PV3, V13, V14, V15, V16, V17, V18, V19, V20)** while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

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

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

53. Condition D.2.11 "Visible Emissions Notations" has been deleted from the final permit as follows. The remaining conditions of this section have been renumbered:

~~D.2.11 Visible Emissions Notations~~

~~(a) Daily visible emission notations of the gelcoat, laminating, touch up, surface coating, and grinding stacks exhaust shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.~~

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

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

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

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

54. Condition D.2.12 "Parametric Monitoring" has been deleted from the final permit as follows. The remaining conditions of this section have been renumbered:

~~D.2.12 Parametric Monitoring~~

~~The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the grinding operation, at least once weekly when the grinding operation is in operation. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 3.0 and 6.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.~~

~~The instrument used for determining the pressure shall comply with Section C Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.~~

55. The following condition has been deleted from the final permit. The remaining conditions of this section have been renumbered:

~~D.2.13 Baghouse Inspections~~

~~An inspection shall be performed each calendar quarter of all bags controlling the fiberglass grinding operation. All defective bags shall be replaced.~~

56. Condition D.2.14 "Parametric Monitoring" has been deleted from the final permit as follows. The remaining conditions of this section have been renumbered:

~~D.2.14 Broken Bag or Failure Detection~~

~~In the event that bag failure has been observed:~~

~~(a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced.~~

~~(b) Based upon the findings of the inspection, any corrective actions will be devised within eight (8) hours of discovery and will include a timetable for completion.~~

57. Condition D.2.15 (now renumbered Condition D.2.12) "Record Keeping Requirements" has been changed to be as follows:

~~D.2.15~~ **D.2.12** Record Keeping Requirements

(a) To document compliance with Condition D.2.1 and D.2.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.2.1 and D.2.2.

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

(2) A log of the dates of use;

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

~~(4)~~ **(3)** The cleanup solvent usage for each month;

- ~~(5)(4)~~ The total VOC usage for each month; and
- ~~(6)(5)~~ The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.2.5, the Permittee shall maintain a log of ~~daily~~ **weekly** overspray observations, daily and ~~weekly~~ **monthly** inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- ~~(c)~~ ~~All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.~~
- ~~(c)~~ All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

58. Condition D.2.16 (now renumbered Condition D.2.13) "Reporting Requirements" has been changed to be as follows:

~~D.2.16~~**D.2.13** Reporting Requirements

~~Reports shall be submitted upon request. A quarterly summary of the information to document compliance with Condition D.2.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.~~

59. The equipment listed in Section D.3 "FACILITY OPERATION CONDITIONS" has been changed to be as follows:

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

**Plant 3: 28858 Ventura Drive**

~~(11)~~**(11)**One (1) air-assisted airless laminating ~~booth~~ **area**, identified as E1, with a maximum capacity to laminate 0.05 fiberglass molds per hour, using dry filters to control particulate matter emissions, exhausting to stack E1.

~~(12)~~**(12)**One (1) air-assisted airless gelcoating booth, identified as E2, with a maximum capacity to coat 0.05 fiberglass molds per hour, using dry filters to control particulate matter emissions, exhausting to E2.

~~(13)~~**(13)**One (1) final finish operation, identified as Mold and FF, with a maximum capacity of 0.05 fiberglass molds per hour.

~~(14)~~**(14)**One (1) sanding operation, identified as Plant 3, with a maximum capacity to sand 50 pounds of fiberglass mold per hour, using a cloth filter to control particulate matter emissions, exhausting to stacks GV1 and GV2.

60. Condition D.3.1 "Volatile Organic Compound" has been changed to be as follows:

~~D.3.1~~ Volatile Organic Compound (VOC) [326 IAC 8-1-6]

- ~~(a)~~ Pursuant to CP No. 039-3054-00007, issued on August 2, 1994, records of the surface coating quantities and organic solvent contents shall be maintained for a minimum period of 24 months and made available upon request of the Office of Air Management. Compliance with this condition will make 326 IAC 2-2 (PSD rules) not applicable.

~~(b) Any change or modification which may increase potential emissions to 25 tons per year from the equipment covered in this permit shall obtain a permit pursuant to 326 IAC 8-1-6 before such change may occur.~~

**Pursuant to 326 IAC 8-1-6 (General provisions relating to VOC rules: general reduction requirements for new facilities):**

- (a) Use of gel coats, resins, cleanup solvents, and other material containing volatile organic compounds (VOC) shall be limited such that the potential to emit (PTE) VOC shall be less than twenty-five (25) tons per twelve (12) consecutive months. Compliance with this limit shall be determined based upon the following criteria:
- (1) Monthly usage by weight, monomer content, method of application, and other emission reduction techniques for each gel coat and resin shall be recorded. VOC emissions shall be calculated by multiplying the usage of each gel coat and resin by the emission factor that is appropriate for the monomer content, method of application, and other emission reduction techniques for each gel coat and resin, and summing the emissions for all gel coats and resins. Emission factors shall be obtained from the reference approved by IDEM, OAM.
  - (2) Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA approved form, emission factors shall be taken from the following reference approved by IDEM, OAM: "CFA Emission Models for the Reinforced Plastics Industries,"  
  
Composites Fabricators Association, February 29, 1998, or its updates. For the purposes of these emission calculations, monomer in resins and gel coats that is not styrene shall be considered as styrene on an equivalent basis.

61. Condition D.3.3 "Preventive Maintenance Plan" has been changed to be as follows:

**D.3.3 Preventive Maintenance Plan ~~[326 IAC 2-7-4(e)(9)] 326 IAC 2-7-5(13)]~~**

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

62. Condition D.3.4 "Testing Requirements" has been changed to be as follows:

**D.3.4 Testing Requirements ~~[326 IAC 2-7-6(1),(6)]~~**

**The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance.** If testing is required by IDEM, compliance with the particulate matter limit specified in Condition D.1.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. ~~Testing of this facility is not specifically required by this permit. However this does not preclude testing requirements on this facility under 326 IAC 2-7-5 and 326 IAC 2-7-6.~~

63. Condition D.3.5 "VOC Emissions" has been added to the final permit as follows. The remaining conditions of this section have been renumbered:

**D.3.5 VOC Emissions**

**Compliance with Condition D.3.1 shall be demonstrated at the end of each month based on the total volatile organic compound usage for the most recent 12 consecutive month period.**

64. Condition D.3.5 (now renumbered Condition D.3.6) "Monitoring" has been changed to be as follows:

**D.3.56** Monitoring

---

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, ~~daily~~ **weekly** observations shall be made of the overspray **from the fiberglass operations stacks (E1 and E2)** while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) ~~Weekly~~ **Monthly** inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when **on a noticeable change in** overspray emission, **or** evidence of overspray emission ~~, or other abnormal emission~~ is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

65. Condition D.3.7 (now renumbered Condition D.3.8) "Record Keeping Requirements" has been changed to be as follows:

**D.3.78** Record Keeping Requirements

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- (a) To document compliance with Condition D.3.1, 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.3.1.
- (1) The amount and VOC content **by weight** of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
- (2) A log of the dates of use;
- ~~(3) The volume weighted VOC content of the coatings used for each month;~~
- ~~(4)~~**(3)** The cleanup solvent usage for each month;
- ~~(5)~~**(4)** The total VOC usage for each month; and
- ~~(6)~~**(5)** The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.3.2, the Permittee shall maintain a log of ~~daily~~ **weekly** overspray observations, daily and ~~weekly~~ **monthly** inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

66. On the Certification Form, the line "Emergency/Deviation Occurrence Reporting Form" has been deleted.
67. The fax number on the Emergency/Deviation Occurrence Report Form was changed from (317) 233-6865 to **(317) 233-5967**.
68. On the Emergency/ Deviation Occurrence Reporting Form, the last sentence "Attach a signed certification to complete this report" has been deleted from the bottom of the second page.
69. The Quarterly Compliance Report is now called the Quarterly Compliance Monitoring Report, delete the column marked "No Deviations", and the language has been changed.

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

**PART 70 OPERATING PERMIT  
CERTIFICATION**

Source Name: J.B. Pointdexter & Company, Inc., dba Leer, Inc., dba Leer Midwest  
Source Address: 58288 Ventura Drive and 28858 Ventura Drive, Elkhart, Indiana 46517  
Mailing Address: 58288 Ventura Drive, Elkhart, Indiana 46517  
Part 70 Permit No.: T039-7561-00097

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

Please check what document is being certified:

Annual Compliance Certification Letter

~~Emergency/Deviation Occurrence Reporting Form~~

Test Result (specify) \_\_\_\_\_

Report (specify) \_\_\_\_\_

Notification (specify) \_\_\_\_\_

Other (specify) \_\_\_\_\_

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

Signature:

Printed Name:

Title/Position:

Date:

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: \_\_\_\_\_

~~Attach a signed certification to complete this report. State Form 47738 (5-96)~~

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

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

Source Name: J.B. Pointdexter & Company, Inc., dba Leer, Inc., dba Leer Midwest  
 Source Address: 58288 Ventura Drive and 28858 Ventura Drive, Elkhart, Indiana 46517  
 Mailing Address: 58288 Ventura Drive, Elkhart, Indiana 46517  
 Part 70 Permit No.: T039-7561-00097

**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  
VOC and Particulate  
From Surface Coating Operations**

**Company Name:** J. B. Pointdexter & Company, Inc., dba Leer, Inc., dba Leer Midwest  
**Address City IN Zip:** 58288 Ventura Drive, Elkhart, Indiana 46517  
**CP:** T039-7561-00097  
**Plt ID:** 00097  
**Reviewer:** Angie Lee  
**Date:** 7-28-97

Material	Density (Lb/Gal)	Weight % Volatile (H2O& Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential ton/yr	lb VOC /gal solids	Transfer Efficiency
<b>Plant 1</b>																
Mold Preparation - Glaze	8.33	90.00%	69.0%	21.0%	69.0%	10.00%	0.100	10.00	5.64	1.75	1.75	41.98	7.66	0.00	17.49	100%
Gelcoating - Gelcoat/MEKP	10.76	36.93%	0.0%	36.9%	0.0%	63.09%	1.672	10.00	3.97	3.97	66.44	1594.55	291.01	124.25	6.30	75%
Laminating - Resin/MEKP	9.16	45.80%	0.0%	45.8%	0.0%	54.09%	9.716	10.00	4.20	4.20	407.61	9782.72	1785.35	528.20	7.76	75%
Final Finish & Liners - Tar Remover	6.57	100.00%	0.0%	100.0%	0.0%	0.00%	0.050	10.00	6.57	6.57	3.29	78.84	14.39	0.00	ERR	100%
Final Wipe	8.19	100.00%	0.0%	100.0%	0.0%	0.00%	0.030	10.00	8.19	8.19	2.46	58.97	10.76	0.00	ERR	100%
Adhesive	9.25	67.48%	65.0%	2.5%	72.3%	32.53%	0.200	10.00	0.83	0.23	0.46	11.01	2.01	6.59	0.71	75%
Sealant	8.41	38.00%	0.0%	38.0%	0.0%	44.20%	0.005	10.00	3.20	3.20	0.16	3.83	0.70	0.00	7.23	100%
Prep & Paint - Lacquer Thinner Wiping	7.02	100.00%	0.0%	100.0%	0.0%	0.00%	0.050	10.00	7.02	7.02	3.51	84.24	15.37	0.00	ERR	75%
Mixed Basecoat	8.27	62.67%	0.0%	62.7%	0.0%	37.33%	1.000	10.00	5.18	5.18	51.83	1243.87	227.01	33.80	13.88	75%
Mixed Clearcoat	8.10	49.05%	0.0%	49.1%	0.0%	50.95%	1.000	10.00	3.97	3.97	39.73	953.53	174.02	45.19	7.80	75%
Lacquer Thinner Clean-up	7.02	100.00%	0.0%	100.0%	0.0%	0.00%	0.100	10.00	7.02	7.02	7.02	168.48	30.75	0.00	ERR	75%
<b>Plant 2</b>																
Molds - Gelcoat	10.76	36.94%	0.025%	36.9%	0.3%	47.24%	0.836	12.500	3.98	3.97	41.51	996.19	181.80	77.64	8.41	75%
Lacquer Thinner	7.00	100.00%	0.0%	100.0%	0.0%	0.00%	0.015	12.500	7.00	7.00	1.31	31.50	5.75	0.00	ERR	100%
B2/B3 - Resin	9.16	45.81%	0.02%	45.8%	0.02%	44.33%	4.858	12.500	4.20	4.19	254.70	6112.87	1115.60	330.06	9.46	75%
B2/B3 - Lacquer Thinner	7.00	100.00%	0.0%	100.0%	0.0%	0.00%	0.015	12.500	7.00	7.00	1.31	31.50	5.75	0.00	ERR	100%
B5 - Basecoat	8.87	64.75%	0.0%	64.8%	0.0%	22.06%	0.509	12.500	5.74	5.74	36.51	876.32	159.93	21.77	26.04	75%
B6 - Clearcoat	8.10	55.50%	0.0%	55.5%	0.0%	37.80%	0.500	12.500	4.50	4.50	28.10	674.33	123.06	24.67	11.89	75%
B5/B6 - Lacquer Thinner	7.00	100.00%	0.0%	100.0%	0.0%	0.00%	0.020	12.500	7.00	7.00	1.75	42.00	7.67	0.00	ERR	100%
B4 - Adhesive	9.25	67.60%	65.2%	2.4%	72.3%	24.50%	0.100	12.500	0.81	0.22	0.28	6.72	1.23	0.00	0.91	100%
B4 - Sealant	8.41	38.00%	0.0%	38.0%	0.0%	44.20%	0.004	12.500	3.20	3.20	0.15	3.55	0.65	0.00	7.23	100%
B4 - Silicone/Tar Remover	6.57	100.00%	0.0%	100.0%	0.0%	0.00%	0.030	12.500	6.57	6.57	2.46	59.13	10.79	0.00	ERR	100%
B4 - Glaze	8.33	90.00%	69.0%	21.0%	69.0%	10.00%	0.050	12.500	5.64	1.75	1.09	26.24	4.79	0.00	17.49	100%
B4 - Final Wipe	8.10	100.00%	84.0%	16.0%	82.8%	0.00%	0.100	12.500	7.45	1.30	1.62	38.88	7.10	0.00	ERR	100%
<b>Plant 3</b>																
E1 - Lamination - Resin	9.16	45.81%	0.02%	45.8%	0.02%	54.19%	24.290	0.050	4.20	4.19	5.09	122.26	22.31	6.60	7.74	75%
E2 - Gelcoating - Gelcoat	10.76	36.91%	0.0%	36.9%	0.0%	63.09%	4.180	0.050	3.97	3.97	0.83	19.92	3.64	1.55	6.30	75%
Mold - Glaze	8.33	90.00%	69.0%	21.0%	69.0%	10.00%	0.100	0.050	5.64	1.75	0.01	0.21	0.04	0.00	17.49	100%
FF - S/T Rmvr	6.57	100.00%	0.0%	100.0%	0.0%	0.00%	0.030	0.050	6.57	6.57	0.01	0.24	0.04	0.00	ERR	100%

State Potential Emissions

Add worst case coating to all solvents

584.25

14022.04

2559.02

738.03

METHODOLOGY

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

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

**Company Name:** J.B. Pointdexter & Company, Inc., dba Leer, Inc., dba Leer Midwest  
**Address City IN Zip:** 58288 Ventura Drive, Elkhart, Indiana 46517  
**CP:** T039-7561-00097  
**Pit ID:** 039-00097  
**Reviewer:** Angie Lee  
**Date:** 7-28-97

Material	Density (lb/gal)	Weight % Styrene Monomer	Gallons per unit	Units per hour	Pound VOC per hour	Pounds VOC per day	Tons of VOC per Year	PM tons per year	Emission Factor (Flash off)	Transfer Efficiency
<b>Plant 2 - Truck Caps</b>										
Gelcoat	10.76	35.9%	0.84	12.50	14.20	340.70	62.18	111.02	35%	65%
Resin - Laminating	9.16	45.0%	4.86	12.50	87.64	2103.46	383.88	469.19	35%	65%
<b>Plant 3 - Fiberglass Molds</b>										
Resin - Laminating	9.16	45.0%	24.29	0.05	1.75	42.05	7.67	9.38	35%	65%
Gelcoat - Gel	10.76	39.5%	4.18	0.05	0.31	7.46	1.36	2.09	35%	65%
<b>Totals:</b>					<b>103.90</b>	<b>2493.67</b>	<b>455.10</b>	<b>591.67</b>		

**METHODOLOGY**

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

Potential VOC Pounds per Day = Density (lb/gal) \* Weight % Monomer \* Gal of Material (gal/unit) \* Maximum (unit/hr) \* (24 hrs / 1 day) \* Emission 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) \* Emission 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 = Worst Coating + Sum of all solvents used

Emission Factor for Hand Layup of resin NVS is 10%, VS is 7%, for Spray Layup of resin NVS is 13%, VS is 9%

Emission Factor for Hand and Spray Layup of gelcoat NVS is 35%, VS is 25%

Emission Factors are from AP42, Fifth Edition (January 1995), Table 4.4-2

NVS = Non-vapor suppressed resin

VS = Vapor suppressed resin