

Mr. James Shafer
Covermaster, Inc.
57784 CR 3
Elkhart, IN 46517

Re: Significant Source Modification No:
039-12770-00137

Dear Mr. Shafer:

Covermaster, Inc. applied for a Part 70 operating permit on December 4, 1996 for stationary fiberglass truck cap and component manufacturing source. An application to modify the source was received on October 5, 2000. Pursuant to 326 IAC 2-7-10.5 the following emission units are approved for construction at the source:

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

The proposed Significant Source Modification approval will be incorporated into the pending Part 70 permit application pursuant to 326 IAC 2-7-10.5(l)(3). If there are no changes to the proposed construction of the emission units, the source may begin operating on the date that IDEM receives an affidavit of construction pursuant to 326 IAC 2-7-10.5(h). If there are any changes to the proposed construction the source can not operate until an Operation Permit Validation Letter is issued.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Michael Hirtler at (973) 575-2555, extension 3229, or at (800) 451-6027 press 0 and ask for extension 3-6878.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments

MH / EVP

cc: File - Elkhart County
U.S. EPA, Region V
Elkhart County Health Department
Air Compliance Section Inspector - Greg Wingstrom
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michelle Boner

PART 70 SIGNIFICANT SOURCE MODIFICATION OFFICE OF AIR QUALITY

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

(herein known as the Permittee) is hereby authorized to construct and operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this approval.

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

Source Modification No.: 039-12770-00137	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: Expiration Date:

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SECTION A SOURCE SUMMARY

This approval is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the emission units contained in conditions A.1 through A.2 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 approval pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

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

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

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

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

This stationary source is approved to construct and operate the following emission units and pollution control devices:

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

The new equipment will be installed at the onsite location identified by the source as Plant #1.

A.3 Part 70 Permit Applicability [326 IAC 2-7-2]

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

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

SECTION B GENERAL CONSTRUCTION CONDITIONS

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

Terms in this approval 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.2 Effective Date of the Permit [IC13-15-5-3]

Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.

B.3 Revocation of Permits [326 IAC 2-1.1-9(5)][326 IAC 2-7-10.5(i)]

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

B.4 Significant Source Modification [326 IAC 2-7-10.5(h)]

This document shall also become the approval to operate pursuant to 326 IAC 2-7-10.5(h) when, prior to start of operation, the following requirements are met:

- (a) The attached affidavit of construction shall be submitted to the Office of Air Quality (OAQ), Permit Administration & Development Section, verifying that the emission units were constructed as proposed in the application. The emissions units covered in the Significant Source Modification approval may begin operating on the date the affidavit of construction is postmarked or hand delivered to IDEM if constructed as proposed.
- (b) If actual construction of the emissions units differs from the construction proposed in the application, the source may not begin operation until the source modification has been revised pursuant to 326 IAC 2-7-11 or 326 IAC 2-7-12 and an Operation Permit Validation Letter is issued.
- (c) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.
- (d) The Permittee shall receive an Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section and attach it to this document.

However, in the event that the Title V application is being processed at the same time as this application, the following additional procedures shall be followed for obtaining the right to operate:

- (a) If the Title V draft permit has not gone on public notice, then the change/addition covered by the Significant Source Modification will be included in the Title V draft.
- (b) If the Title V permit has gone through final EPA proposal and would be issued ahead of the Significant Source Modification, the Significant Source Modification will go thru a concurrent 45 day EPA review. Then the Significant Source Modification will be incorporated into the final Title V permit at the time of issuance.

- (c) If the Title V permit has not gone thru final EPA review and would be issued after the Significant Source Modification is issued, then the Modification would be added to the proposed Title V permit, and the Title V permit will issued after EPA review.

SECTION C GENERAL OPERATION CONDITIONS

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

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

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

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

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

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

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

- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement the PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.3 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

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

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

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

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

C.4 Opacity [326 IAC 5-1]

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

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

C.5 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided by statute or rule, or in this approval, all air pollution control equipment listed in this approval and used to comply with an applicable requirement shall be operated at all times that the emission unit vented to the control equipment is in operation.

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

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

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

C.7 Performance Testing [326 IAC 3-6][326 IAC 2-1.1-11]

- (a) Compliance testing on new emission units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this approval, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

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

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

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

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

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

C.8 Compliance Monitoring [326 IAC 2-1.1-11]

Compliance with applicable requirements shall be documented as required by this approval. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

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

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

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. The compliance monitoring plan can be either an entirely new document, consist in whole of information contained in other documents, or consist of a combination of new information and information contained in other documents. If the compliance monitoring plan incorporates by reference information contained in other documents, the Permittee shall identify as part of the compliance monitoring plan the documents in which the information is found. The elements of the compliance monitoring plan are:
- (1) This condition;
 - (2) The Compliance Determination Requirements in Section D of this approval;
 - (3) The Compliance Monitoring Requirements in Section D of this approval;
 - (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 approval; and
 - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this approval. CRP's shall be submitted to IDEM, OAQ, upon request and shall be subject to review and approval by IDEM, OAQ. The CRP shall be prepared within ninety (90) days after issuance of this approval by the Permittee and maintained on site, and is comprised of:
 - (A) Reasonable response steps that may be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this approval; and
 - (B) A time schedule for taking reasonable response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this approval, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to take reasonable response steps may constitute a violation of the approval.
- (c) Upon investigation of a compliance monitoring excursion, the Permittee is excused from taking further response steps for any of the following reasons:
- (1) A false reading occurs due to the malfunction of the monitoring equipment. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.

- (2) The Permittee has determined that the compliance monitoring parameters established in the approval conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the approval, and such request has not been denied.
 - (3) An automatic measurement was taken when the process was not operating.
 - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (e) All monitoring required in Section D shall be performed at all times the equipment is operating. If monitoring is required by Section D and the equipment is not operating, then the Permittee may record the fact that the equipment is not operating or perform the required monitoring.
- (f) At its discretion, IDEM may excuse the Permittee's failure to perform the monitoring and record keeping as required by Section D, if the Permittee provides adequate justification and documents that such failures do not exceed five percent (5%) of the operating time in any quarter. Temporary, unscheduled unavailability of qualified staff shall be considered a valid reason for failure to perform the monitoring or record keeping requirements in Section D.

C.12 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
[326 IAC 2-7-6]

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

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

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

C.13 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

- (a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) All record keeping requirements not already legally required shall be implemented within ninety (90) days of approval issuance.

C.14 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

- (a) The reports required by conditions in Section D of this approval shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (b) Unless otherwise specified in this approval, any notice, report, or other submission required by this approval shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) Unless otherwise specified in this approval, any quarterly report required in Section D of this approval shall be submitted within thirty (30) days of the end of the reporting period. The reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) The first report shall cover the period commencing on the date of issuance of this approval and ending on the last day of the reporting period. Reporting periods are based on calendar years.

SECTION D.1 FACILITY OPERATION CONDITIONS

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

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

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

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

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

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

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

- (3) When applying coatings and VOC solvents other than gel coats and resins, VOC emissions shall be calculated using an emission factor of 2,000 pounds of VOC emitted per ton of VOC used.
- (b) Resins and gel coats used, including filled resins and tooling resins and gel coats, shall be limited to maximum monomer contents of 35 percent (35%) by weight for resins, 37 percent (37%) by weight for gel coats or their equivalent on an emissions mass basis. Monomer contents shall be calculated on a neat basis, i.e., excluding any filler. Compliance with these monomer content limits shall be demonstrated on a monthly basis.

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

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

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

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

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

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

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

D.1.2 New Source Toxics Control [326 IAC 2-4.1-1]

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

or

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

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

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

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

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

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

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

Compliance Determination Requirements

D.1.5 Volatile Organic Compounds (VOC) and Volatile Organic Hazardous Air Pollutants (HAP)

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

D.1.6 VOC and HAP Emissions

Compliance with Conditions D.1.1 and D.1.2 for VOC and volatile organic HAP, respectively, shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound and volatile organic HAP usages for the most recent twelve (12) month period.

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

D.1.7 Particulate Matter (PM)

In order to comply with D.1.3, the dry filters for PM control shall be in operation at all times when the gel and resin application booths B-7 and B-8 are in operation.

D.1.8 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the B-7 and B-8 facility stacks SV-7 and SV-8 while the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

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

D.1.9 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the volatile organic compounds (VOC) and volatile organic HAP emission limits established.
 - (1) The usage by weight and monomer content of resin and gel coat used, and the usage by weight and VOC and volatile organic HAP content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) Method of application and other emission reduction techniques for each resin and gel coat used;
 - (4) The calculated total volatile organic HAP emitted from resin and gel coat usage for each month and for the compliance period; and

- (5) The calculated total volatile organic compounds (VOC) emitted from all coatings, including resin and gel coat usage, for each month and for the compliance period.
- (b) To document compliance with Condition D.1.8, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.10 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1 and D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

**PART 70 SOURCE MODIFICATION
CERTIFICATION**

Source Name: Covermaster, Inc.
Source Address: 57784 C.R. 3, Elkhart, Indiana 46517
Mailing Address: 57784 C.R. 3, Elkhart, Indiana 46517
Source Modification No.: SSM 039-12770-00137

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

Please check what document is being certified:

- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Affidavit (specify) _____
- 9 Other (specify) _____

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

Signature:

Printed Name:

Title/Position:

Date:

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

Part 70 Source Modification Quarterly Report

Source Name: Covermaster, Inc.
 Source Address: 57784 C.R. 3, Elkhart, Indiana 46517
 Mailing Address: 57784 C.R. 3, Elkhart, Indiana 46517
 Source Modification No.:SSM 039-12770-00137
 Facility: gel coat booth B-7 & chop coat booth B-8
 Parameter: volatile organic compounds (VOC) and volatile organic hazardous air pollutants (HAPs)
 Limit: (a) Use of resins, gel coats and clean-up solvents, as well as VOC delivered to the applicators, shall be limited such that the potential to emit (PTE) VOC from resin and gel coat applications shall be limited to less than 100 tons per twelve (12) consecutive month period.
 (b) Use of resins and gel coats shall be limited such that the total potential to emit (PTE) volatile organic hazardous air pollutant (HAP) from resins and gel coats only shall be less than 100 tons per twelve (12) consecutive month period. Compliance with this limit shall be determined based upon the following criteria:
 (1) When applying gel coats and resins, VOC emissions shall be calculated by multiplying the material usage by the appropriate emission factor based on the monomer content, method of application, and other emission reduction techniques, and summing the emissions for all gel coats and resins.
 (2) Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA- approved form, emission factors for the gel coat and resin applications shall be taken from the following reference approved by IDEM, OAQ: "CFA Emission Models for the Reinforced Plastics Industries," Composites Fabricators Association, February 28, 1998 (updated as the "Unified Emission Factors for Open Molding of Composites" ("CFA Factors", April 1999). For the purposes of these emission calculations, monomer in resins and gel coats that is not styrene shall be considered as styrene on an equivalent weight basis.
 (3) When applying coatings and VOC solvents other than gel coats and resins, VOC emissions shall be calculated using an emission factor of 2,000 pounds of VOC emitted per ton of VOC used.

YEAR: _____

Month	Emitted This Month (tons)		Emitted Previous 11 Months (tons)		Total Emitted 12 Months (tons)	
	VOC	volatile organic HAPs	VOC	volatile organic HAPs	VOC	volatile organic HAPs
Month 1						
Month 2						
Month 3						

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

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

Attach a signed certification to complete this report.

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

**Addendum to the
Technical Support Document for a Significant Source Modification
to a Part 70 Operating Permit**

Source Name:	Covermaster, Inc.
Source Location:	57784 C.R. 3, Elkhart, Indiana 46517
County:	Elkhart
SIC Code:	3799
Operation Permit No.:	T039-7354-00137
Operation Permit Issuance Date:	Pending
Source Modification No.:	SSM 139-12770-00137
Permit Reviewer:	Michael Hirtler / EVP

On December 14, 2000, the Office of Air Quality (OAQ) had a notice published in the Elkhart Truth, Elkhart, Indiana, stating that Covermaster, Inc. had applied for a significant source modification to a Part 70 operating permit. The significant source modification was for the construction and operation of one (1) gel coat booth, one (1) resin application booth, two (2) product preparation booths and one (1) water cutting machine at the existing fiberglass products manufacturing plant. The notice also stated that OAQ proposed to issue a permit for this installation 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 the close of the 30 day comment period, no comments were received on the proposed significant source modification permit. However, the draft permit and associated supporting documents have been modified in their entirety to revise the name of the permitting authority from the previously identified Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM), to the current Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). No other changes have been made to the draft permit.

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

Technical Support Document (TSD) for a
Significant Source Modification to a Part 70 Operating Permit

Source Background and Description

Source Name:	Covermaster, Inc.
Source Location:	57784 C.R. 3, Elkhart, Indiana 46517
County:	Elkhart
SIC Code:	3799
Operation Permit No.:	T039-7354-00137
Operation Permit Issuance Date:	Pending
Source Modification No.:	SSM 139-12770-00137
Permit Reviewer:	Michael Hirtler / EVP

The Office of Air Quality (OAQ) has reviewed a modification application from Covermaster, Inc. relating to the construction and operation of the following emission units and pollution control devices:

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

The new equipment will be installed at the onsite location identified by the source as Plant #1.

History

On October 5, 2000, Covermaster, Inc. submitted an application to the OAQ requesting a source modification. This first significant source modification will include the installation of one (1) new gel coat booth and one (1) new fiberglass chop resin booth. An application for a Part 70 permit (T039-7354-00137) for this existing source was received on December 4, 1996.

Unpermitted Emission Units and Pollution Control Equipment

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

Existing Approvals

The source applied for Part 70 Operating Permit T001-6264-00002 on July 15, 1996. The source has been operating under previous approvals including, but not limited to, the following:

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

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
SV-7	gel booth	2.8	2	5250	ambient
SV-8	chop resin booth	2.8	2	5250	ambient

Recommendation

The staff recommends to the Commissioner that the Significant Source Modification 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 application for the purposes of this review was received on October 5, 2000.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (two (2) pages).

Potential To Emit Before Controls for the Modification

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

This table reflects the potential to emit (PTE) before controls for the modification. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	70.1
PM-10	70.1
SO ₂	0.0
VOC	184.6
CO	0.0
NO _x	0.0

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

HAP's	Potential To Emit (tons/year)
styrene	69.8

Justification for Modification

The Part 70 operating permit is being modified through a Part 70 Significant Source Modification, and this modification is being performed based on the following justification:

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of particulate matter (PM), particulate matter with an aerodynamic diameter at or below 10 microns (PM-10), and volatile organic compounds (VOC) are equal to or greater than 25 tons per year. The source is subject to the provisions of 326 IAC 2-7, and a Part 70 permit application was submitted on December 4, 1996. Therefore, the source is subject to the provisions of 326 IAC 2-7-10.5(f)(4) for this significant source modification.
- (b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single hazardous air pollutant (HAP), as defined under Section 112(b) of the Clean Air Act (CAA), is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is greater than or equal to twenty-five (25) tons per year. The source is subject to the provisions of 326 IAC 2-7, and a Part 70 permit application was submitted on December 4, 1996. Therefore, the source is subject to the provisions of 326 IAC 2-7-10.5(f)(6) for this significant source modification.

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM-10	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	maintenance
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as maintenance for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Elkhart County has been classified as attainment or unclassifiable for the remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (c) Fugitive Emissions
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Source Status

Existing Source PSD Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (ton/yr)
PM	3.1
PM10	3.5
SO ₂	0.0
VOC	233.7
CO	5.2
NO _x	6.4

- (a) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the 28 listed source categories.
- (b) These emissions are based upon the Technical Support Documents to Construction Permit CP039-4510-00137, issued October 11, 1995, and Construction Permit CP089-9337-00435, issued June 15, 1998.

Potential to Emit After Controls for the Modification

The table below summarizes the total potential to emit, reflecting all limits, of the modification (based on 8,760 hours of operation per year at rated capacity including enforceable emissions control and/or production limits, where applicable):

Process/facility	Limited Potential to Emit (tons/year)							
	PM	PM-10	SO ₂	VOC	CO	NO _x	Single HAP	Total HAPs
Gel Booth B-7	0.4	0.4	0.0	79.1	0.0	0.0	79.1	79.1
Fiberglass Chop Resin Booth B-8	0.0	0.0	0.0	72.9	0.0	0.0	72.9	72.9
Total Gel & Resin Catalyst Usage	0.0	0.0	0.0	32.6	0.0	0.0	0.0	0.0
Prep Booths 1 & 2	<0.01	<0.01	0.0	0.0	0.0	0.0	0.0	0.0
Total Modification Emissions	0.4	0.4	0.0	<100 *	0.0	0.0	<100*	<100*
PSD Threshold Level	250	250	250	250	250	250	N/A	N/A

* Reflects VOC and volatile organic HAP input usage limits such that the potential to emit VOC and volatile organic HAP is each limited to less than 100 tons per 12 consecutive month period.

This modification to an existing PSD minor stationary source is not major because the emission increases due to the modification are less than the applicable PSD threshold levels. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply to the modification.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this proposed modification.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 61) applicable to this proposed modification.
- (c) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 20 and 40 CFR Part 63) applicable to this source modification.

State Rule Applicability - Entire Source

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

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

326 IAC 2-2 (Prevention of Significant Deterioration)

Pursuant to 326 IAC 2-2 and 40 CFR 52.21 (Prevention of Significant Deterioration, PSD), this proposed modification is not considered a major modification because the source is an existing PSD minor stationary source and the proposed modification has the potential to emit less than applicable PSD threshold emission levels for any regulated pollutant. Therefore, the PSD rules, 326 IAC 2-2 and 40 CFR 52.21, will not apply to the proposed modification.

326 IAC 2-6 (Emission Reporting)

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

326 IAC 5-1 (Opacity Limitations)

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

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

326 IAC 6-4 (Fugitive Dust Emissions)

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

State Rule Applicability - Individual Facilities

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

Pursuant to 326 IAC 2-4.1-1 (New Source Toxics Control), any new process or production unit, which in and of itself emits or has the PTE 10 tons per year of any HAP or 25 tons per year of the combination of HAPs, and is constructed or reconstructed after July 27, 1997, must be controlled using technologies consistent with Maximum Achievable Control Technology (MACT). Gel booth B-7 and resin booth B-8 will be constructed after the July 27, 1997 rule applicability date and both will have a PTE greater than 10 tons per year of a single HAP (as styrene) and 25 tons per year of the combination of HAPs. Pursuant to the MACT determination under 326 IAC 2-4.1-1, operating conditions for the new booths B-7 and B-8 shall be the following:

- (a) Use of resins and gel coats shall be limited such that the potential to emit (PTE) volatile organic HAP from resins and gel coats only shall be less than 100 tons 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. Volatile organic HAP emissions shall be calculated by multiplying the usage of each gel coat and resin by the emission factor that is appropriate for the monomer content, method of application, and other emission reduction techniques for each gel coat and resin, and summing the emissions for all gel coats and resins. Emission factors shall be obtained from the reference approved by IDEM, OAQ.

(2) Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA- approved form, emission factors shall be taken from the following reference approved by IDEM, OAQ: "CFA Emission Models for the Reinforced Plastics Industries," Composites Fabricators Association, February 28, 1998 (updated as the "Unified Emission Factors for Open Molding of Composites" ("CFA Factors", April 1999)), and shall not exceed 32.3% styrene emitted per weight of gel coat applied and 17.7% styrene emitted per weight of resin applied. For the purposes of these emission calculations, monomer in resins and gel coats that is not styrene shall be considered as styrene on an equivalent weight basis.

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

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

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

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

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

(c) Flow coaters, a type of non-spray application technology of a design and specifications to be approved by IDEM, OAQ, shall be used to apply neat resins. If it is not possible to apply neat resins with flow coaters, equivalent emissions reductions must be obtained via use of other techniques elsewhere in the process. Examples of other techniques include, but are not limited to, lower monomer content resins and gel coats, closed molding, vapor suppression, or installing a control device with an overall reduction efficiency of 95%.

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

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

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

326 IAC 6-3-2 (Process Operations)

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

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

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

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

or

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

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

The particulate matter emissions from these facilities shall comply with 326 IAC 6-3-2 by using dry filters for overspray control at all times when the facilities are in operation.

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

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

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

Based on the compliance calculation (see page 2 of 2, Appendix A), the controlled potential emissions are less than the allowable emissions, and the facilities shall comply with 326 IAC 6-3-2 by using a PM dust control system at all times during operation. However, there will be no compliance monitoring conditions inserted into the permit, as the facilities, each with a control device, do not have allowable emissions exceeding 10 pounds per hour. Additionally, the facility control device exhausts into the production building and not directly to the atmosphere.

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

This rule applies to facilities located anywhere in the state that were constructed on or after January 1, 1980, and which have potential volatile organic compound (VOC) emissions of 25 tons per year or more and are not otherwise regulated by other provisions of Article 8. New fiberglass production at gel booth B-7 and resin booth B-8 will result in a PTE VOC greater than 25 tons per year and, therefore, the requirements of 326 IAC 8-1-6 apply to this modification. Pursuant to the BACT determination under 326 IAC 8-1-6, operating conditions for the new booths B-7 and B-8 shall be the following:

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

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

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

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

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

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

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

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

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

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

There are no other Article 8 requirements applicable to this modification

Testing Requirements

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

Compliance Requirements

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

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

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

1. The new gel coat booth B-7 and resin coat booth B-8 have applicable compliance monitoring conditions as specified below:
 - (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks SV-7 and SV-8 while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
 - (b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
 - (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

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

Conclusion

The construction and operation of this proposed modification, including the new gel coat booth B-7 and resin chop coat booth B-8, shall be subject to the conditions of the attached proposed Significant Source Modification No. 039-12770-00137.