INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We Protect Hoosiers and Our Environment.
100 N. Senate Avenue • Indianapolis, IN 46204
(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

Preliminary Findings Regarding a
Significant Modification to a
Part 70 Operating Permit

for Smoker Craft, Incorporated in Elkhart County

Significant Source Modification No.: 039-43320-00073
Significant Permit Modification No.: 039-43322-00073

The Indiana Department of Environmental Management (IDEM) has received an application from Smoker Craft, Incorporated, located at 68143 Clunette Street and 67977 Division Street, New Paris, Indiana 46553, for a significant modification of its Part 70 Operating Permit issued on December 4, 2019. If approved by IDEM's Office of Air Quality (OAQ), this proposed modification would allow Smoker Craft, Incorporated to make certain changes at its existing source. Smoker Craft, Incorporated has applied to construct a new gel coat booth.

The applicant intends to construct and operate new equipment that will emit air pollutants; therefore, the permit contains new or different permit conditions. In addition, some conditions from previously issued permits/approvals have been corrected, changed, or removed. These corrections, changes, and removals may include Title I changes (e.g., changes that add or modify synthetic minor emission limits). IDEM has reviewed this application and has developed preliminary findings, consisting of a draft permit and several supporting documents, which would allow the applicant to make this change.

A copy of the permit application and IDEM's preliminary findings have been sent to:

Goshen Public Library
601 S. 5th Street
Goshen, IN 46526

and

IDEM Northern Regional Office
300 North Dr. Martin Luther King Jr. Boulevard, Suite 450
South Bend, IN 46601-1295

A copy of the preliminary findings is available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/.

A copy of the application and preliminary findings is also available via IDEM's Virtual File Cabinet (VFC). To access VFC, please go to: http://www.in.gov/idem/ and enter VFC in the search box. You will then have the option to search for permit documents using a variety of criteria.

How can you participate in this process?

The date that this notice is posted on IDEM's website (https://www.in.gov/idem/5474.htm) marks the beginning of a 30-day public comment period. If the 30th day of the comment period falls on a day when IDEM offices are closed for business, all comments must be postmarked or delivered in person on the next business day that IDEM is open.

You may request that IDEM hold a public hearing about this draft permit. If adverse comments concerning the **air pollution impact** of this draft permit are received, with a request for a public hearing, IDEM will decide whether or not to hold a public hearing. IDEM could also decide to hold a public meeting instead of, or in addition to, a public hearing. If a public hearing or meeting is held, IDEM will make a separate announcement of the date, time, and location of that hearing or meeting. At a hearing, you would have an opportunity to submit written comments and make verbal comments. At a meeting, you would have an opportunity to submit written comments, ask questions, and discuss any air pollution concerns with IDEM staff.

Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so that you can be added to IDEM's mailing list to receive notice of future action related to this permit. If you do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit number SSM 039-43320-00073 and SPM 039-43322-00073 in all correspondence.

Comments should be sent to:

Olajumoke Kayode
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for Olajumoke Kayode or (317) 234-5373
Or dial directly: (317) 234-5373
Fax: (317) 232-6749 attn: Olajumoke Kayode
E-mail: okayode@idem.IN.gov

All comments will be considered by IDEM when we make a decision to issue or deny the permit. Comments that are most likely to affect final permit decisions are those based on the rules and laws governing this permitting process (326 IAC 2), air quality issues, and technical issues. IDEM does not have legal authority to regulate zoning, odor, or noise. For such issues, please contact your local officials.

For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Air Permits page on the Internet at: http://www.in.gov/idem/airquality/2356.htm; and the Citizens' Guide to IDEM on the Internet at: http://www.in.gov/idem/6900.htm.

What will happen after IDEM makes a decision?

Following the end of the public comment period, IDEM will issue a Notice of Decision stating whether the permit has been issued or denied. If the permit is issued, it may be different than the draft permit because of comments that were received during the public comment period. If comments are received during the public notice period, the final decision will include a document that summarizes the comments and IDEM's response to those comments. If you have submitted comments or have asked to be added to the mailing list, you will receive a Notice of the Decision. The notice will provide details on how you may appeal IDEM's decision, if you disagree with that decision. The final decision will also be available on the Internet at the address indicated above and will also be sent to the local library indicated above, the IDEM Regional Office indicated above, and the IDEM public file room on the 12th floor of the Indiana Government Center North, 100 N. Senate Avenue, Indianapolis, Indiana 46204-2251.

If you have any questions, please contact Olajumoke Kayode of my staff at the above address.

Iryn Calilung, Section Chief
Permits Branch
Office of Air Quality

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Commissioner

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Mr. Todd Taylor
Smoker Craft Incorporated
68143 Clunette Street
New Paris, Indiana 46553

Re: 039-43320-00073
Significant Source Modification

Dear Mr. Taylor:

Smoker Craft Incorporated was issued Part 70 Operating Permit Renewal No. T039-41837-00073 on December 4, 2019 for a stationary fiberglass and aluminum boat manufacturing operation located at 68143 Clunette Street and 67977 Division Street, New Paris, Indiana 46553. An application to modify the source was received on September 29, 2020. Pursuant to the provisions of 326 IAC 2-7-10.5, a Significant Source Modification is hereby approved as described in the attached Technical Support Document.

Pursuant to 326 IAC 2-7-10.5, the following emission unit is approved for construction at the source:

One (1) gel coat booth, identified as 24/25-4GC, approved in 2020 for construction, using mechanical non-atomized application, with a maximum capacity of 1.0 unit per hour, using dry filters for particulate control and exhausting to Stack 24/25-4GCS.

The following construction conditions are applicable to the proposed modification:

General Construction Conditions

1. The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).

2. This approval to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

Effective Date of the Permit

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

Commenced Construction

4. Pursuant to 326 IAC 2-1.1-9 and 326 IAC 2-7-10.5(j), 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.

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5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

Approval to Construct

6. Pursuant to 326 IAC 2-7-10.5(h)(2), this Significant Source Modification authorizes the construction of the new emission unit(s), when the Significant Source Modification has been issued.

Pursuant to 326 IAC 2-7-10.5(m), the emission units constructed under this approval shall not be placed into operation prior to revision of the source's Part 70 Operating Permit to incorporate the required operation conditions.

Pursuant to 326 IAC 2-7-12, operation of the new emission unit(s) is not approved until the Significant Permit Modification has been issued. Operating conditions shall be incorporated into the Part 70 Operating Permit as a Significant Permit Modification in accordance with 326 IAC 2-7-10.5(m)(2) and 326 IAC 2-7-12 (Permit Modification).

A copy of the permit is available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/. A copy of the application and permit is also available via IDEM's Virtual File Cabinet (VFC). To access VFC, please go to: http://www.in.gov/idem/ and enter VFC in the search box. You will then have the option to search for permit documents using a variety of criteria. For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Air Permits page on the Internet at: http://www.in.gov/idem/airquality/2356.htm; and the Citizens' Guide to IDEM on the Internet at: http://www.in.gov/idem/6900.htm.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5.

If you have any questions regarding this matter, please contact Olajumoke Kayode, Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251, or by telephone at (317) 234-5373 or (800) 451-6027, and ask for Olajumoke Kayode or (317) 234-5373.

Sincerely,

Iryn Calilung, Section Chief
Permits Branch
Office of Air Quality

Attachments: Significant Source Modification and Technical Support Document

cc: File - Elkhart County
Elkhart County Health Department
U.S. EPA, Region 5
Compliance and Enforcement Branch
IDEM Northern Regional Office

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Significant Source Modification to a Part 70 Source

OFFICE OF AIR QUALITY

Smoker Craft, Incorporated
68143 Clunette Street
New Paris, Indiana 46553

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.
This permit also addresses certain new source review requirements for new and/or existing equipment and is intended to fulfill the new source review procedures pursuant to 326 IAC 2-7-10.5, applicable to those conditions.

Significant Source Modification No.: 039-43320-00073 Master Agency Interest ID.: 11637	
Issued by: Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date:

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Attachment A: 40 CFR Part 63, Subpart VVVV [326 IAC 20-48] - National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing.

Attachment B: 40 CFR Part 63, Subpart ZZZZ [326 IAC 20-82] - National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines.

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SECTION A SOURCE SUMMARY

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

A.1 General Information [326 IAC 2-7-4(c)][326 IAC 2-7-5(14)][326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary fiberglass and aluminum boat manufacturing operation.

Source Address:	68143 Clunette Street and 67977 Division Street, New Paris, Indiana 46553
General Source Phone Number:	(574) 831-2013
SIC Code:	3732 (Boat Building and Repairing)
County Location:	Elkhart
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Operating Permit Program Minor Source, under PSD and Emission Offset Rules Major Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Source Definition [326 IAC 2-7-1(22)]

This fiberglass and aluminum boat manufacturing operation consist of two (2) plants:

(a) Plant 1, consisting of 13 buildings, identified as Buildings 1, 2, 3, 5, 6, 7, 9, 10, 11, 12, 13, 14, and 15, is located at 68143 Clunette Street, New Paris, Indiana 46553, and

(b) Plant 2, consisting of 12 buildings, identified as Buildings 17, 18, 20, 21, 22, 23, 24, 25, 26, 29, 30, and 31, is located at 67977 Division Street, New Paris Indiana 46553.

Since the two (2) plants are located on adjacent properties, belong to the same industrial grouping, and under common control of the same entity, they are considered one (1) major source as defined by 326 IAC 2-7-1(22).

This determination was initially made under Part 70 Renewal No. 039-35173-00073, issued on June 18, 2015.

A.3 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)][326 IAC 2-7-5(14)]

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

(a) Twenty three (23) glue stations, using manual application methods and air-assisted airless spray guns at low pressure resulting in no formation of airborne particulate, each glue station with a maximum throughput of 1.33 units per hour, applying adhesives to wood boat components, vinyl fabric, or carpeting, and only to the exterior, non-enclosed surfaces of the marine vessels (recreational boats), using no controls, exhausting indoors and consisting of the following:

Emission Unit ID	Building Number	Year Constructed/ Approved	Note
2-1GS	2	Prior to 1980	

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Emission Unit ID	Building Number	Year Constructed/ Approved	Note
3-1GS	3	1993	Formerly identified as 3-6GS
3-2GS	3	Prior to 1980	Formerly identified as 27-1GS, relocated from building 27
5-1GS	5	Prior to 1980	
5-2GS	5	Prior to 1980	
5-3GS	5	Prior to 1980	
5-4GS	5	2012	
7-1GS	7	2012	Formerly identified as 27-3GS, relocated from building 27
7-2GS	7	2012	Formerly identified as 27-4GS, relocated from building 27
7-3GS	7	2012	Formerly identified as 27-5GS, relocated from building 27
7-4GS	7	1992	Formerly identified as 25-6GS, relocated from building 25
7-5GS	7	Approved in 2019 for construction	
7-6GS	7	2012	
7-7GS	7	2012	
7-8GS	7	2012	
7-9GS	7	Approved in 2019 for construction	
7-10GS	7	Approved in 2019 for construction	
7-11GS	7	Approved in 2019 for construction	
7-12GS	7	Approved in 2019 for construction	
7-13GS	7	Approved in 2019 for construction	
14-1GS	14	Prior to 1980	
27-1GS	27	2012	
27-2GS	27	Prior to 1980	

(b) Five (5) paint booths, using air-assisted airless spray guns, each booth with a maximum throughput of 1.0 units per hour, applying coatings only to the exterior, non-enclosed surfaces of the aluminum marine vessels (recreational boats), using dry filters for particulate control and consisting of the following:

Emission Unit ID	Year Constructed	Stack
6-1PB	Prior to 1980	6-1
6-2PB		6-2
13-1PB		13-1
13-2PB		13-2
13-3PB.		13-3

(c) One (1) paint booth, identified as 6-3PB, constructed in 2008, using HVLP spray guns, with a total maximum throughput of 1.25 units per hour, applying coatings only to the exterior, non-enclosed surfaces of the aluminum marine vessels (recreational boats), using dry filters for particulate control, and exhausting to stack 6-3.

(d) One (1) portable catalyst/fiber resin chop gun, identified as 24/25-1RC, constructed prior to 1980, using non-atomized (fluid impingement) application methods, with a maximum capacity of 2.0 units per hour, using no control, and exhausting indoors.

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(e) Six (6) stationary catalyst/fiber resin chop guns, using non-atomized (fluid impingement) application methods, with a total maximum capacity of 2.0 units per hour, using dry filters for particulate control and consisting of the following:

Emission Unit ID	Year Constructed	Stack
24/25-2RC	Prior to 1980	24/25-2RCS
24/25-3RC		24/25-3RCS
24/25-4RC		24/25-4RCS
24/25-5RC		24/25-5RCS
24/25-6RC		24/25-6RCS
24/25-7RC		24/25-7RCS

(f) Four (4) gel coat booths, each with a maximum capacity of 1.0 unit per hour, using dry filters for particulate control and consisting of the following:

Emission Unit ID	Year Constructed	Gel Coat Application Method	Stack
24/25-1GC	Prior to 1980	Air-assisted airless	24/25-1GCS
24/25-2GC			24/25-1GCS
24/25-3GC	2008		24/25-3GCS
24/25-4GC	Approved in 2020 for construction	Mechanical non-atomized	24/25-4GCS

(g) Two (2) fiberglass grinding and cutting operations, constructed prior to 1980 and approved in 2019 to change control and exhaust stack, each with a maximum throughput of 2,900 pounds of fiberglass per hour, both using a shared baghouse (24/25-BH) for particulate control, and consisting of the following:

Emission Unit ID	Exhaust stack
24/25-1FG	24/25-BHS
24/25-2FG	

(h) One (1) Polyurethane liner operation to coat boats, identified as 24/25-BL, approved in 2019 for construction, with a maximum throughput of 2.00 units per hour, using dry filters (24/25-BLDF) as control and exhausting to stack 24/25-BLS.

[Under 40 CFR 63, Subpart VVVV, this fiberglass and aluminum boat manufacturing plant is considered an existing affected source.]

A.4 Specifically Regulated Insignificant Activities
[326 IAC 2-7-1(21)][326 IAC 2-7-4(c)][326 IAC 2-7-5(14)]

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

(a) Two (2) gel coat/final finish touch-up operations, including manual cleaning, polishing and waxing operations, identified as 24/25-1TU and 24/25-2TU, located in buildings 24/25, constructed prior to 1980, each with a maximum throughput of 2.0 units per hour, using no control, and exhausting indoors.

[Under 40 CFR 63, Subpart VVVV, these units are considered existing affected sources.]

(b) One (1) paint touch-up operation, identified as 24/25-3TU, constructed prior to 1980, relocated from Building 1 to Building 24/25 in 2015, using air-assisted airless spray application, with a maximum throughput of 1.0 units per hour, uses less than 5 gallons of

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coating per day, applying coatings only to the exterior, non-enclosed surfaces of the aluminum marine vessels (recreational boats), using no control, and exhausting indoors.

[Under 40 CFR 63, Subpart VVVV, this unit is considered an existing affected source.]

(c) Three (3) woodworking operations, with integral cyclones and return air bagfilter collection systems for particulate control, exhausting indoors and consisting of the following:

(1) One (1) woodworking operation, identified as 9-1W, with a maximum throughput of 1100 pounds of wood per hour;

(2) One (1) woodworking operation, identified as 9-2W, with a maximum throughput of 200 pounds of wood per hour;

(3) One (1) woodworking operation, identified as 7-1W, relocated from Building 23 to Building 7 in 2016, with a maximum throughput of 200 pounds of wood per hour.

(d) One (1) Dust Collector System used to vacuum boats, identified as 24/25-VAC, approved in 2019 for construction, with a material input rate of 5,800.00 pounds per hour, located in Building 24/25, using cartridge filters (24/25-VACCF) as control and exhausting to stack 24/25-VACS.

(e) Forty nine (49) welding machines, using electrostatic precipitators for particulate control, and exhausting indoors as follows:

Building number	Process	Number of Stations	Maximum electrode usage per station (lb/hr)
2	MIG Welding	4	1.25
3	MIG Welding	13	1.25
5	MIG Welding	3	1.25
27	TIG Welding	29	1.20

(f) Fifty (50) welding machines, approved in 2019 for construction, using no controls, and exhausting indoors as follows:

Building number	Process	Number of Stations	Maximum electrode usage per station (lb/hr)
2	MIG Welding	7	1.25
	TIG Welding	6	1.20
3	MIG Welding	8	1.25
	TIG Welding	5	1.20
5	MIG Welding	2	1.25
	TIG Welding	1	1.20
14	MIG Welding	1	1.25
	TIG Welding	1	1.20
18	MIG Welding	1	1.25
	TIG Welding	2	1.20
22	MIG Welding	8	1.25
	TIG Welding	10	1.20
27	MIG Welding	17	1.25
	TIG Welding	25	1.20
31	MIG Welding	2	1.25
	TIG Welding	3	1.20

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(g) Natural gas-fired combustion sources, each with heat input equal to or less than ten (10) million Btu per hour, and total heat input capacity of 21.2 million Btu per hour.

(h) One (1) 155 horsepower diesel-fired emergency stationary fire pump, manufactured in 1976.

[Under 40 CFR 63, Subpart ZZZZ, this is considered an affected facility.]

(i) Paved and unpaved roads and parking lots with public access.

A.5 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).

(c) It is an affected source under Title IV (Acid Deposition Control) of the Clean Air Act, as defined in 326 IAC 2-7-1(3);

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SECTION B GENERAL CONDITIONS

B.1 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, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.2 Permit Term [326 IAC 2-7-5(2)][326 IAC 2-1.1-9.5][326 IAC 2-7-4(a)(1)(D)][IC 13-15-3-6(a)]

(a) This permit, 039-41837-00073, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit or of permits issued pursuant to Title IV of the Clean Air Act and 326 IAC 21 (Acid Deposition Control).

(b) If IDEM, OAQ, upon receiving a timely and complete renewal 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.

B.3 Term of Conditions [326 IAC 2-1.1-9.5]

Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

(a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or

(b) the emission unit to which the condition pertains permanently ceases operation.

B.4 Enforceability [326 IAC 2-7-7] [IC 13-17-12]

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

B.5 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.6 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.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]

(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.

(b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

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B.8 Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]

(a) A certification required by this permit meets the requirements of 326 IAC 2-7-6(1) if:

(1) it contains a certification by a "responsible official" as defined by 326 IAC 2-7-1(35), and

(2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.

(c) A "responsible official" is defined at 326 IAC 2-7-1(35).

B.9 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. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than April 15 of each year to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

United States Environmental Protection Agency, Region 5
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

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

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

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

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

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

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(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(12)][326 IAC 1-6-3]

(a) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:

(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.

The Permittee shall implement the PMPs.

(b) If required by specific condition(s) in Section D of this permit where no PMP was previously required, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, 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 and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

The PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

The Permittee shall implement the PMPs.

(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

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causes or is the primary contributor to an exceedance of any limitation on emissions. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

(d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.11 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.

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

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

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

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

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

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance and Enforcement Branch), or
Telephone Number: 317-233-0178 (ask for Office of Air Quality, Compliance and Enforcement Branch)
Facsimile Number: 317-233-6865
Northern Regional Office phone: (574) 245-4870; fax: (574) 245-4877.

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

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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;

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(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 a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

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

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(8) be revised in response to an emergency.

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

(g) 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.

B.12 Permit Shield [326 IAC 2-7-15][326 IAC 2-7-20][326 IAC 2-7-12]

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

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

(b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable

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requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

(c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

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

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

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5][326 IAC 2-7-10.5]

(a) All terms and conditions of permits established prior to 039-41837-00073 and issued pursuant to permitting programs approved into the state implementation plan have been either:

(1) incorporated as originally stated,

(2) revised under 326 IAC 2-7-10.5, or

(3) deleted under 326 IAC 2-7-10.5.

(b) Provided that all terms and conditions are accurately reflected in this combined permit, all previous registrations and permits are superseded by this combined new source review and part 70 operating permit, except for permits issued pursuant to Title IV of the Clean Air Act and 326 IAC 21 (Acid Deposition Control)

B.14 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).

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B.15 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 Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

(c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.16 Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(42). The renewal application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

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

(2) 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

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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) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-7-4(a)(2)(D), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.17 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12] [40 CFR 72]

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

(b) Pursuant to 326 IAC 2-7-11(b) and 326 IAC 2-7-12(a), administrative Part 70 operating permit amendments and permit modifications for purposes of the acid rain portion of a Part 70 permit shall be governed by regulations promulgated under Title IV of the Clean Air Act. [40 CFR 72]

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

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

(d) 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.18 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)][326 IAC 2-7-12(b)(2)]

(a) No Part 70 permit revision or notice 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) 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.19 Operational Flexibility [326 IAC 2-7-20][326 IAC 2-7-10.5]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b) or (c) 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;

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(2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;

(3) The changes do not result in emissions which exceed the limitations provided in 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
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

United States Environmental Protection Agency, Region 5
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, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-7-20(b)(1) and (c)(1). The Permittee shall make such records available, upon reasonable request, for public review.

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

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(37)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

(d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ or U.S. EPA is required.

(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.

(f) This condition does not apply to emission trades of SO_2 or NO_X under 326 IAC 21 or 326 IAC 10-4.

B.20 Source Modification Requirement [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2.

B.21 Inspection and Entry [326 IAC 2-7-6][IC 13-14-2-2][IC 13-30-3-1][IC 13-17-3-2]

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

(a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;

(c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.22 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

(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.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.

(b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-8590 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.24 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314] [326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

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SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply 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 5-1-1 (Applicability) and 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

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

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

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

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

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

The Permittee shall not operate an incinerator except as provided in 326 IAC 4-2 or in this permit. The Permittee shall not operate a refuse incinerator or refuse burning equipment except as provided in 326 IAC 9-1-2 or in this permit.

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

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

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work

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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
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Demolition and Renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

(g) Indiana Licensed 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 Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

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

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

(a) For performance testing required by this permit, a test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

(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 a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

(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 Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

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

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

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

C.9 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]

(a) For new units:
Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units shall be implemented on and after the date of initial start-up.

(b) For existing units:
Unless otherwise specified in this permit, for all monitoring requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance to begin such monitoring. If, due to circumstances beyond the Permittee's control, any monitoring equipment required by this permit cannot be installed and operated no later than ninety (90) days after permit issuance, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue

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MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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 a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

C.10 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

(a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale. The analog instrument shall be capable of measuring values outside of the normal range.

(b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

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

C.11 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 maintain the most recently submitted written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.12 Risk Management Plan [326 IAC 2-7-5(11)] [40 CFR 68]

If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

C.13 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]

Upon detecting an excursion where a response step is required by the D Section or an exceedance of a limitation in this permit:

(a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.

(b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:

(1) initial inspection and evaluation;

(2) recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system); or

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(3) any necessary follow-up actions to return operation to normal or usual manner of operation.

(c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:

(1) monitoring results;

(2) review of operation and maintenance procedures and records; and/or

(3) inspection of the control device, associated capture system, and the process.

(d) Failure to take reasonable response steps shall be considered a deviation from the permit.

(e) The Permittee shall record the reasonable response steps taken.

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall submit a description of its response actions to IDEM, OAQ no later than seventy-five (75) days after the date of the test.

(b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) 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 response action documents submitted pursuant to this condition do require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

C.15 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]

In accordance with the compliance schedule specified in 326 IAC 2-6-3(b)(1), starting in 2004 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

(1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);

(2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(33) (“Regulated pollutant, which is used only for purposes of Section 19 of this rule”) from the source, for purpose of fee assessment.

The statement must be submitted to:

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Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue
MC 61-50 IGCN 1003
Indianapolis, Indiana 46204-2251

The emission statement does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

C.16 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

(a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. Support information includes the following, where applicable:

(AA) All calibration and maintenance records.
(BB) All original strip chart recordings for continuous monitoring instrumentation.
(CC) Copies of all reports required by the Part 70 permit.

Records of required monitoring information include the following, where applicable:

(AA) The date, place, as defined in this permit, and time of sampling or measurements.
(BB) The dates analyses were performed.
(CC) The company or entity that performed the analyses.
(DD) The analytical techniques or methods used.
(EE) The results of such analyses.
(FF) The operating conditions as existing at the time of sampling or measurement.

These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

C.17 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

(a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of this paragraph. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

(b) The address for report submittal is:

Indiana Department of Environmental Management

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Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

(d) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

C.18 Compliance with 40 CFR 82 and 326 IAC 22-1

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

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SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(a) Twenty three (23) glue stations, using manual application methods and air-assisted airless spray guns at low pressure resulting in no formation of airborne particulate, each glue station with a maximum throughput of 1.33 units per hour, applying adhesives to wood boat components, vinyl fabric, or carpeting, and only to the exterior, non-enclosed surfaces of the marine vessels (recreational boats), using no controls, exhausting indoors and consisting of the following:

Emission Unit ID	Building Number	Year Constructed/ Approved	Note
2-1GS	2	Prior to 1980	
3-1GS	3	1993	Formerly identified as 3-6GS
3-2GS	3	Prior to 1980	Formerly identified as 27-1GS, relocated from building 27
5-1GS	5	Prior to 1980	
5-2GS	5	Prior to 1980	
5-3GS	5	Prior to 1980	
5-4GS	5	2012	
7-1GS	7	2012	Formerly identified as 27-3GS, relocated from building 27
7-2GS	7	2012	Formerly identified as 27-4GS, relocated from building 27
7-3GS	7	2012	Formerly identified as 27-5GS, relocated from building 27
7-4GS	7	1992	Formerly identified as 25-6GS, relocated from building 25
7-5GS	7	Approved in 2019 for construction	
7-6GS	7	2012	
7-7GS	7	2012	
7-8GS	7	2012	
7-9GS	7	Approved in 2019 for construction	
7-10GS	7	Approved in 2019 for construction	
7-11GS	7	Approved in 2019 for construction	
7-12GS	7	Approved in 2019 for construction	
7-13GS	7	Approved in 2019 for construction	
14-1GS	14	Prior to 1980	
27-1GS	27	2012	
27-2GS	27	Prior to 1980	

(b) Five (5) paint booths, using air-assisted airless spray guns, each booth with a maximum throughput of 1.0 units per hour, applying coatings only to the exterior, non-enclosed surfaces of the aluminum marine vessels (recreational boats), using dry filters for particulate control and consisting of the following:

Emission Unit ID	Year Constructed	Stack
6-1PB		6-1

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6-2PB	Prior to 1980	6-2
13-1PB		13-1
13-2PB		13-2
13-3PB.		13-3

(c) One (1) paint booth, identified as 6-3PB, constructed in 2008, using HVLP spray guns, with a total maximum throughput of 1.25 units per hour, applying coatings only to the exterior, non-enclosed surfaces of the aluminum marine vessels (recreational boats), using dry filters for particulate control, and exhausting to stack 6-3.

(d) One (1) portable catalyst/fiber resin chop gun, identified as 24/25-1RC, constructed prior to 1980, using non-atomized (fluid impingement) application methods, with a maximum capacity of 2.0 units per hour, using no control, and exhausting indoors.

(e) Six (6) stationary catalyst/fiber resin chop guns, using non-atomized (fluid impingement) application methods, with a total maximum capacity of 2.0 units per hour, using dry filters for particulate control and consisting of the following:

Emission Unit ID	Year Constructed	Stack
24/25-2RC	Prior to 1980	24/25-2RCS
24/25-3RC		24/25-3RCS
24/25-4RC		24/25-4RCS
24/25-5RC		24/25-5RCS
24/25-6RC		24/25-6RCS
24/25-7RC		24/25-7RCS

(f) Four (4) gel coat booths, each with a maximum capacity of 1.0 unit per hour, using dry filters for particulate control and consisting of the following:

Emission Unit ID	Year Constructed	Gel Coat Application Method	Stack
24/25-1GC	Prior to 1980	Air-assisted airless	24/25-1GCS
24/25-2GC			24/25-1GCS
24/25-3GC	2008		24/25-3GCS
24/25-4GC	Approved in 2020 for construction	Mechanical non-atomized	24/25-4GCS

(h) One (1) Polyurethane liner operation to coat boats, identified as 24/25-BL, approved in 2019 for construction, with a maximum throughput of 2.00 units per hour, using dry filters (24/25-BLDF) as control and exhausting to stack 24/25-BLS.

[Under 40 CFR 63, Subpart VVVV, this fiberglass and aluminum boat manufacturing plant is considered an existing affected source.]

Insignificant Activities:

(a) Two (2) gel coat/final finish touch-up operations, including manual cleaning, polishing and waxing operations, identified as 24/25-1TU and 24/25-2TU, located in buildings 24/25, constructed prior to 1980, each with a maximum throughput of 2.0 units per hour, using no control, and exhausting indoors.

[Under 40 CFR 63, Subpart VVVV, these units are considered existing affected sources.]

(b) One (1) paint touch-up operation, identified as 24/25-3TU, constructed prior to 1980,

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relocated from Building 1 to Building 24/25 in 2015, using air-assisted airless spray application, with a maximum throughput of 1.0 units per hour, uses less than 5 gallons of coating per day, applying coatings only to the exterior, non-enclosed surfaces of the aluminum marine vessels (recreational boats), using no control, and exhausting indoors.

[Under 40 CFR 63, Subpart VVVV, this unit is considered an existing affected source.]

(The information describing the process contained in this emissions unit 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) PSD Minor Limit [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the combined VOC emissions from the facilities listed below shall not exceed 247 tons per twelve (12) consecutive month period, with compliance determined at the end of each month:

Twenty three (23) Glue Stations
Five (5) Airless Paint Booths
One (1) HVLP Paint Booth
One (1) portable catalyst/fiber resin chop gun
Six (6) stationary catalyst/fiber resin chop guns
Four (4) gel coat booths
Two (2) Gel coat/final finish touch-up operations
One (1) Paint touch-up operation
One (1) Polyurethane Boat Lining Operation

Compliance with this limit, combined with the potential to emit VOC from all other emission units at this source, shall limit the source-wide total potential to emit of VOC to less than 250 tons per twelve (12) consecutive month period and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable

D.1.2 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(d), particulate from the following shall be controlled by dry filters, and the Permittee shall operate the control devices in accordance with manufacturer's specifications:

Paint Booths
6-1PB
6-2PB
6-2PB
13-1PB
13-2PB
13-3PB
Gel Coat Booths
24/25-1GC
24/25-2GC
24/25-3GC
24/25-4GC

D.1.3 Emission Standards for Fiberglass Boat Manufacturing [326 IAC 20-48-2]

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Pursuant to 326 IAC 20-48-2, in addition to alternative organic HAP content requirements for open molding resin operations contained in Table 2 to 40 CFR 63, Subpart VVVV, the alternative HAP content requirements for gel coat operations are as follows:

Gel Coat Application		
For this operation	And this application method	The Permittee shall not exceed this weighted-average percent organic HAP content (weight percent) requirement
Pigmented gel coat operations	Atomized (spray)	33 percent
Clear gel coat operations	Atomized (spray)	48 percent
Tooling gel coat operations	Atomized (spray)	40 percent
Pigmented gel coat operations	Nonatomized (nonspray)	40 percent
Clear gel coat operations	Nonatomized (nonspray)	55 percent
Tooling gel coat operations	Nonatomized (nonspray)	54 percent

D.1.4 Work Practice Standards for Fiberglass Boat Manufacturing [326 IAC 20-48-3]

Pursuant to 326 IAC 20-48-3, in addition to the requirements imposed by 40 CFR 63.5731 and 40 CFR 63.5734(b), the following work practice standards shall be implemented:

(a) Nonatomizing spray equipment shall not be operated at pressures that atomize the material during the application process.

(b) Solvents sprayed during cleanup and resin changes shall be directed into solvent collection containers.

(c) For routine flushing of resin and gel coat application equipment, such as spray guns, flowcoaters, brushes, rollers, and squeegees, owners or operators must use a cleaning solvent that contains no hazardous air pollutants (HAPs). However, recycled cleaning solvents that contain less than or equal to five percent (5%) HAP by weight are considered to contain no HAP for the purposes of this subdivision. For removing cured resin or gel coat from application equipment, no organic HAP limit applies.

(d) Clean-up rags with solvent shall be stored in closed containers.

(e) Closed containers shall be used for the storage of the following:

(1) All production and tooling resins that contain HAPs.

(2) All production and tooling gel coats that contain HAPs.

(3) Waste resins and gel coats that contain HAPs.

(4) Cleaning materials, including waste cleaning materials.

(5) Other materials that contain HAPs.

(f) The covers of the closed containers must have no visible gaps and must be in place at all times, except when equipment is placed in or removed from the container.

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D.1.5 Operator Training for Fiberglass Boat Manufacturing [326 IAC 20-48-4]

Pursuant to 326 IAC 20-48-4, all new and existing personnel, including contract personnel, who are involved in resin and gel coat spraying and spray-like applications that could result in excess emissions if performed improperly, shall be trained according to the following schedule:

(a) All personnel hired shall be trained within fifteen (15) days of hiring.

(b) To ensure training goals listed in Condition D.1.5(d) are maintained, all personnel shall be given refresher training annually.

(c) Personnel who have been trained by another owner or operator subject to 326 IAC 20-48 are exempt from requirements of Condition D.1.5(a) if written documentation that the employee's training is current is provided to the new employer.

(d) The lesson plans shall cover, for the initial and refresher training, at a minimum, all of the following topics:

(1) Appropriate application techniques.

(2) Appropriate equipment cleaning procedures.

(3) Appropriate equipment setup and adjustment to minimize material usage and overspray.

D.1.6 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

A Preventive Maintenance Plan is required for these facilities and their control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

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

D.1.7 Volatile Organic Compounds (VOC) [326 IAC 8-1-2][326 IAC 8-1-4]

(a) Compliance with the VOC emission limit contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4 and 326 IAC 8-1-2(a), by preparing or obtaining from the manufacturer the copies of the VOC data sheets or Material Safety Data Sheets (MSDS). IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

(b) Compliance with the VOC emission limit contained in Condition D.1.1 shall be determined by multiplying the monthly usage of each resin and gel coat by the emission factor provided in "Unified Emission Factors for Open Molding of Composites," Composites Fabricators Association, October 13, 2009, or its updates. VOC emissions from the open molding operations catalyst shall be calculated by multiplying the monthly usage of the catalyst by the emission factor provided in "Emission Factors for Liquid Organic Peroxide Catalysts used in the Open Molding of Composites." The emission factors for all other VOC emitting compounds shall be 100% of the input of volatile organic compounds.

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

D.1.8 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity, and particle loading of the filters controlling the following:

Paint Booths
6-1PB
6-2PB

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Paint Booths
6-2PB
13-1PB
13-2PB
13-3PB
Gel Coat Booths
24/25-1GC
24/25-2GC
24/25-3GC
24/25-4GC

(b) To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the stacks of the following while one or more of the booths are in operation:

Paint Booths
6-1PB
6-2PB
6-2PB
13-1PB
13-2PB
13-3PB
Gel Coat Booths
24/25-1GC
24/25-2GC
24/25-3GC
24/25-4GC

If a condition exists which should result in a response step, the Permittee shall take reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

(c) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground of the following:

Paint Booths
6-1PB
6-2PB
6-2PB
13-1PB
13-2PB
13-3PB
Gel Coat Booths
24/25-1GC
24/25-2GC
24/25-3C
24/25-4GC

When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

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

D.1.9 Record Keeping Requirement

(a) To document the compliance status with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC emission limit established in Condition D.1.1. Records necessary to demonstrate compliance shall be available no later than 30 days after the end of each compliance period.

(1) The amount and VOC content of each material and solvent used. Records shall include purchase orders, invoices; safety data sheets (SDS), waste manifests, and calculations necessary to verify the type and amount used.

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

(3) The weight of VOC emitted for each compliance period.

(b) Pursuant to 326 IAC 20-48-4, and in order to document the compliance status with Condition D.1.5, the Permittee shall maintain the following training records on site and available for inspection and review:

(1) A copy of the current training program.

(2) A list of all current personnel, by name, that are required to be trained and the dates they were trained and the date of the most recent refresher training.

Records of prior training programs and former personnel are not required to be maintained.

(c) To document the compliance status with Condition D.1.8, the Permittee shall maintain a log of daily filter inspections, weekly overspray observations, monthly emissions, and overspray inspections. The Permittee shall include in its daily record when an inspection or observation was not made and the reason for the lack of an inspection or observation notation (e.g. the process did not operate that day).

(d) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

D.1.10 Reporting Requirements

A quarterly summary of the information to document the compliance status with Condition D.1.1 shall be submitted using the reporting form located at the end of this permit, or its equivalent, not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting Requirements contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a “responsible official,” as defined by 326 IAC 2-7-1(35).

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SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(g) Two (2) fiberglass grinding and cutting operations, constructed prior to 1980 and approved in 2019 to change control and exhaust stack, each with a maximum throughput of 2,900 pounds of fiberglass per hour, both using a shared baghouse (24/25-BH) for particulate control, and consisting of the following:

Emission Unit ID	Exhaust stack
24/25-1FG	24/25-BHS
24/25-2FG	

[Under 40 CFR 63, Subpart VVVV, this fiberglass and aluminum boat manufacturing plant is considered an existing affected source.]

Insignificant Activities:

(c) Three (3) woodworking operations, with integral cyclones and return air bagfilter collection systems for particulate control, exhausting indoors and consisting of the following:

(1) One (1) woodworking operation, identified as 9-1W, with a maximum throughput of 1100 pounds of wood per hour;

(2) One (1) woodworking operation, identified as 9-2W, with a maximum throughput of 200 pounds of wood per hour;

(3) One (1) woodworking operation, identified as 7-1W, relocated from Building 23 to Building 7 in 2016, with a maximum throughput of 200 pounds of wood per hour.

(d) One (1) Dust Collector System used to vacuum boats, identified as 24/25-VAC, approved in 2019 for construction, with a material input rate of 5,800.00 pounds per hour, located in Building 24/25, using cartridge filters (24/25-VACCF) as control and exhausting to stack 24/25-VACS.

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

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

D.2.1 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the particulate from the facilities listed below shall be limited as specified when operating at the respective process weight rate:

Emission Unit	Process Weight Rate (tons/hr)	Emission Limitation (lbs/hr)
Fiberglass grinding and cutting operation (24/25-1FG)	1.45	5.26
Fiberglass grinding and cutting operation (24/25-2FG)	1.45	5.26
Dust Collector System (24/25-VAC)	2.90	8.37

The pounds per hour limitations were calculated with the following equation:

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

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

D.2.2 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

A Preventive Maintenance Plan is required for these facilities and their control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

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

D.2.3 Particulate Control

(a) The integral cyclones and return air bagfilter collection systems for particulate control shall be in operation at all times when the woodworking operations are in operation.

(b) In order to assure compliance with Condition D.2.1, the baghouse (24/25-BH) and cartridge filters (24/25-VACCF) for particulate control shall be in operation and control emissions at all times when the following are in operation:

fiberglass grinding and cutting operations (24/25-1FG and 24/25-2FG)
Dust Collection System (24/25-VAC)

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

D.2.4 Visible Emissions Notations

(a) Visible emission notations of the stack exhausts of the following:
(i) baghouse (24/25-BH) and
(ii) cartridge filters (24/25-VACCF)
shall be performed once per day 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) If abnormal emissions are observed, the Permittee shall take a reasonable response. Section C – Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

D.2.5 Broken or Failed Bag Detection

(a) For a single compartment baghouse or filter controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down

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immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

(b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Bag failure can be indicated by a significant drop in the baghouse's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

D.2.6 Cyclone Failure Detection

In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emissions unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

D.2.7 Record Keeping Requirement

(a) To document the compliance status with Condition D.2.4, the Permittee shall maintain records of daily visible emission notations of the baghouse (24/25-BH) and the cartridge filters (24/25-VACCF) stack exhausts. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of a visible emission notation, (i.e. the process did not operate that day).

(b) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

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SECTION E.1 **NESHAP**

Emissions Unit Description:

(a) Twenty three (23) glue stations, using manual application methods and air-assisted airless spray guns at low pressure resulting in no formation of airborne particulate, each glue station with a maximum throughput of 1.33 units per hour, applying adhesives to wood boat components, vinyl fabric, or carpeting, and only to the exterior, non-enclosed surfaces of the marine vessels (recreational boats), using no controls, exhausting indoors and consisting of the following:

Emission Unit ID	Building Number	Year Constructed/ Approved	Note
2-1GS	2	Prior to 1980	
3-1GS	3	1993	Formerly identified as 3-6GS
3-2GS	3	Prior to 1980	Formerly identified as 27-1GS, relocated from building 27
5-1GS	5	Prior to 1980	
5-2GS	5	Prior to 1980	
5-3GS	5	Prior to 1980	
5-4GS	5	2012	
7-1GS	7	2012	Formerly identified as 27-3GS, relocated from building 27
7-2GS	7	2012	Formerly identified as 27-4GS, relocated from building 27
7-3GS	7	2012	Formerly identified as 27-5GS, relocated from building 27
7-4GS	7	1992	Formerly identified as 25-6GS, relocated from building 25
7-5GS	7	Approved in 2019 for construction	
7-6GS	7	2012	
7-7GS	7	2012	
7-8GS	7	2012	
7-9GS	7	Approved in 2019 for construction	
7-10GS	7	Approved in 2019 for construction	
7-11GS	7	Approved in 2019 for construction	
7-12GS	7	Approved in 2019 for construction	
7-13GS	7	Approved in 2019 for construction	
14-1GS	14	Prior to 1980	
27-1GS	27	2012	
27-2GS	27	Prior to 1980	

(b) Five (5) paint booths, using air-assisted airless spray guns, each booth with a maximum throughput of 1.0 units per hour, applying coatings only to the exterior, non-enclosed surfaces of the aluminum marine vessels (recreational boats), using dry filters for particulate control and consisting of the following:

Emission Unit ID	Year Constructed	Stack
6-1PB		6-1

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6-2PB	Prior to 1980	6-2
13-1PB		13-1
13-2PB		13-2
13-3PB.		13-3

(c) One (1) paint booth, identified as 6-3PB, constructed in 2008, using HVLP spray guns, with a total maximum throughput of 1.25 units per hour, applying coatings only to the exterior, non-enclosed surfaces of the aluminum marine vessels (recreational boats), using dry filters for particulate control, and exhausting to stack 6-3.

(d) One (1) portable catalyst/fiber resin chop gun, identified as 24/25-1RC, constructed prior to 1980, using non-atomized (fluid impingement) application methods, with a maximum capacity of 2.0 units per hour, using no control, and exhausting indoors.

(e) Six (6) stationary catalyst/fiber resin chop guns, using non-atomized (fluid impingement) application methods, with a total maximum capacity of 2.0 units per hour, using dry filters for particulate control and consisting of the following:

Emission Unit ID	Year Constructed	Stack
24/25-2RC	Prior to 1980	24/25-2RCS
24/25-3RC		24/25-3RCS
24/25-4RC		24/25-4RCS
24/25-5RC		24/25-5RCS
24/25-6RC		24/25-6RCS
24/25-7RC		24/25-7RCS

(f) Four (4) gel coat booths, each with a maximum capacity of 1.0 unit per hour, using dry filters for particulate control and consisting of the following:

Emission Unit ID	Year Constructed	Gel Coat Application Method	Stack
24/25-1GC	Prior to 1980	Air-assisted airless	24/25-1GCS
24/25-2GC			24/25-1GCS
24/25-3GC	2008		24/25-3GCS
24/25-3GC	Approved in 2020 for construction	Mechanical non-atomized	24/25-4GCS

(h) One (1) Polyurethane liner operation to coat boats, identified as 24/25-BL, approved in 2019 for construction, with a maximum throughput of 2.00 units per hour, using dry filters (24/25-BLDF) as control and exhausting to stack 24/25-BLS.

[Under 40 CFR 63, Subpart VVVV, this fiberglass and aluminum boat manufacturing plant is considered an existing affected source.]

Insignificant Activities:

(a) Two (2) gel coat/final finish touch-up operations, including manual cleaning, polishing and waxing operations, identified as 24/25-1TU and 24/25-2TU, located in buildings 24/25, constructed prior to 1980, each with a maximum throughput of 2.0 units per hour, using no control, and exhausting indoors.

[Under 40 CFR 63, Subpart VVVV, these units are considered existing affected sources.]

(b) One (1) paint touch-up operation, identified as 24/25-3TU, constructed prior to 1980,

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relocated from Building 1 to Building 24/25 in 2015, using air-assisted airless spray application, with a maximum throughput of 1.0 units per hour, uses less than 5 gallons of coating per day, applying coatings only to the exterior, non-enclosed surfaces of the aluminum marine vessels (recreational boats), using no control, and exhausting indoors.

[Under 40 CFR 63, Subpart VVVV, this unit is considered an existing affected source.]

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

National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements [326 IAC 2-7-5(1)]

E.1.1 General Provisions Relating to National Emission Standards for Hazardous Air Pollutants under 40 CFR Part 63 [326 IAC 20-1] [40 CFR Part 63, Subpart A]

(a) Pursuant to 40 CFR 63.1 the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1, for the emission unit(s) listed above, except as otherwise specified in 40 CFR Part 63, Subpart VVVV.

(b) Pursuant to 40 CFR 63.10, the Permittee shall submit all required notifications and reports to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

E.1.2 National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing NESHAP [40 CFR Part 63, Subpart VVVV] [326 IAC 20-48]

The Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart VVVV (included as Attachment A to the operating permit), which are incorporated by reference as 326 IAC 20-48, for the emission unit(s) listed above:

(1) 40 CFR 63.5680
(2) 40 CFR 63.5683
(3) 40 CFR 63.5689
(4) 40 CFR 63.5692
(5) 40 CFR 63.5695
(6) 40 CFR 63.5698
(7) 40 CFR 63.5701(a), (b)
(8) 40 CFR 63.5704(a), (b)
(9) 40 CFR 63.5707
(10) 40 CFR 63.5710
(11) 40 CFR 63.5713
(12) 40 CFR 63.5714
(13) 40 CFR 63.5728
(14) 40 CFR 63.5731
(15) 40 CFR 63.5734
(16) 40 CFR 63.5737
(17) 40 CFR 63.5740
(18) 40 CFR 63.5743
(19) 40 CFR 63.5746

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(20) 40 CFR 63.5749
(21) 40 CFR 63.5752
(22) 40 CFR 63.5753
(23) 40 CFR 63.5755
(24) 40 CFR 63.5758
(25) 40 CFR 63.5761
(26) 40 CFR 63.5764(a), (b), (c)
(27) 40 CFR 63.5767(a), (b), (c)
(28) 40 CFR 63.5770
(29) 40 CFR 63.5773
(30) 40 CFR 63.5776
(31) 40 CFR 63.5779
(32) Table 1 to 40 CFR 63, Subpart VVVV
(33) Table 2 to 40 CFR 63, Subpart VVVV
(34) Table 3 to 40 CFR 63, Subpart VVVV
(35) Table 5 to 40 CFR 63, Subpart VVVV
(36) Table 6 to 40 CFR 63, Subpart VVVV
(37) Table 7 to 40 CFR 63, Subpart VVVV
(38) Table 8 to 40 CFR 63, Subpart VVVV

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SECTION E.2 **NESHAP**

Emissions Unit Description: Insignificant Activities:

(h) One (1) 155 horsepower diesel-fired emergency stationary fire pump, manufactured in 1976.

[Under 40 CFR 63, Subpart ZZZZ, this is considered an affected facility.]

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

National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements [326 IAC 2-7-5(1)]

E.2.1 General Provisions Relating to National Emission Standards for Hazardous Air Pollutants under 40 CFR Part 63 [326 IAC 20-1] [40 CFR Part 63, Subpart A]

(a) Pursuant to 40 CFR 63.1 the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1, for the emission unit(s) listed above, except as otherwise specified in 40 CFR Part 63, Subpart ZZZZ.

(b) Pursuant to 40 CFR 63.10, the Permittee shall submit all required notifications and reports to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

E.2.2 National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines NESHAP [40 CFR Part 63, Subpart ZZZZ] [326 IAC 20-82]

The Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart ZZZZ (included as Attachment B to the operating permit), which are incorporated by reference as 326 IAC 20-82, for the emission unit listed above:

(1) 40 CFR 63.6580
(2) 40 CFR 63.6585
(3) 40 CFR 63.6590(a)(1)(ii)
(4) 40 CFR 63.6595(a)(1) and (c)
(5) 40 CFR 63.6602
(6) 40 CFR 63.6604(b)
(7) 40 CFR 63.6605
(8) 40 CFR 63.6625(e), (f), (h), and (i)
(9) 40 CFR 63.6640(a), (b), (d), (e), and (f)
(10) 40 CFR 63.6650(f)
(11) 40 CFR 63.6655(a), (b), (d), (e), and (f)
(12) 40 CFR 63.6660
(13) 40 CFR 63.6665
(14) 40 CFR 63.6670(a)
(15) 40 CFR 63.6675
(16) Table 2c to 40 CFR 63, Subpart ZZZZ
(17) Table 6 to 40 CFR 63, Subpart ZZZZ
(18) Table 8 to 40 CFR 63, Subpart ZZZZ

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INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
PART 70 OPERATING PERMIT
CERTIFICATION

Source Name: Smoker Craft, Incorporated
Source Address: 68143 Clunette Street and 67977 Division Street, New Paris, Indiana 46553
Part 70 Permit No.: 039-41837-00073

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

☐ Test Result (specify)

☐ Report (specify)

☐ Notification (specify)

☐ Affidavit (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:
Phone:
Date:

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INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
Phone: (317) 233-0178
Fax: (317) 233-6865

PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT

Source Name: Smoker Craft, Incorporated
Source Address: 68143 Clunette Street and 67977 Division Street, New Paris, Indiana 46553
Part 70 Permit No.: 039-41837-00073

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

☐ This is an emergency as defined in 326 IAC 2-7-1(12)

- The Permittee must notify the Office of Air Quality (OAQ), within four (**4**) daytime business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
- The Permittee must submit notice in writing or by facsimile within two (**2**) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16.

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

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

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

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by:_____

Title / Position: _____

Date:_____

Phone: _____

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INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

OFFICE OF AIR QUALITY

COMPLIANCE AND ENFORCEMENT BRANCH

Part 70 Quarterly Report

Source Name: Smoker Craft, Incorporated
Source Address: 68143 Clunette Street and 67977 Division Street, New Paris, Indiana 46553
Part 70 Permit No.: 039-41837-00073
Facility:

Twenty three (23) Glue Stations
Five (5) Airless Paint Booths
One (1) HVLP Paint Booth
One (1) portable catalyst/fiber resin chop gun
Six (6) stationary catalyst/fiber resin chop guns
Four (4) gel coat booths
Two (2) Gel coat/final finish touch-up operations
One (1) Paint touch-up operation
One (1) Polyurethane Boat Lining Operation

Parameter: Combined VOC Emissions
Limit: Shall not exceed 247 tons per twelve (12) consecutive month period, with compliance determined at the end of each month

QUARTER : _____ YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month (tons)	Previous 11 Months (tons)	12 Month Total (tons)

☐ No deviation occurred in this quarter.

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

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

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INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Smoker Craft, Incorporated
Source Address: 68143 Clunette Street and 67977 Division Street, New Paris, Indiana 46553
Part 70 Permit No.: 039-41837-00073

Months: _____ to _____ Year: _____

This report shall be submitted quarterly based on a calendar year. Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of paragraph (a) of Section C-General Reporting. Any deviation from the requirements of this permit, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".	
☐ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
☐ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

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

Form Completed by:_____

Title / Position: _____

Date:_____

Phone: _____

Indiana Department of Environmental Management
Office of Air Quality

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

Source Description and Location

Source Name:	**Smoker Craft Incorporated**
Source Location:	**68143 Clunette Street and 67977 Division Street, New Paris, Indiana 46553**
County:	**Elkhart**
SIC Code:	**3732 (Boat Building and Repairing)**
Operation Permit No.:	**T 039-41837-00073**
Operation Permit Issuance Date:	**December 4, 2019**
Significant Source Modification No.:	**039-43320-00073**
Significant Permit Modification No.:	**039-43322-00073**
Permit Reviewer:	**Olajumoke Kayode**

Source Definition

This source consists of the following plants:

(a) Plant 1 consisting of 13 buildings, identified as Buildings 1, 2, 3, 5, 6, 7, 9, 10, 11, 12, 13, 14, and 15 is located at 68143 Clunette Street, New Paris, Indiana 46553, and

(b) Plant 2 consisting of 12 buildings, identified as Buildings 17, 18, 20, 21, 22, 23, 24, 25, 26, 29, 30, and 31 is located at 67977 Division Street, New Paris Indiana 46553.

IDEM, OAQ has determined that these two plants are part of the same source based on the following criteria:

(1) the plants are under common ownership or common control;

(2) the plants have the same two-digit Standard Industrial Classification (SIC) Code or one must serve as a support facility for the other; and,

(3) the plants are located on the same, contiguous or adjacent properties.

The existing plants (Plant 1 and Plant 2) are owned and operated directly by Smoker Craft, Inc. In addition, Plant 1 is run by the same plant management that runs Plant 2. As a result, common ownership and common control exists and the first part of the major source definition is met for both plants.

Plant 1 and Plant 2 manufacture fiberglass and aluminum boats under the two-digit SIC Code 37 for the Major Group Transportation Equipment. This group includes the four-digit SIC Code 3732, which includes boat building and repairing. Since both plants have the same two-digit SIC Code they meet the second part of the major source definition.

The plants are located on separate properties that do not share a common boundary. The existing plant (Plant 1) is directly across the street from plant (Plant 2). The two plants have the same plant manager, share employees and materials, and the production process is split between the plants. Considering all of these factors, IDEM, OAQ finds that the plants are located on adjacent properties.

This determination was initially made under Part 70 Renewal No. 039-35173-00073, issued on June 18, 2015.

Existing Approvals

The source was issued Part 70 Operating Permit Renewal No. 039-41837-00073 on December 4, 2019. There have been no subsequent approvals issued.

County Attainment Status

The source is located in Elkhart County.

Pollutant	Designation
SO_2	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O_3	Unclassifiable or attainment effective January 16, 2018, for the 2015 8-hour ozone standard.
$PM_{2.5}$	Unclassifiable or attainment effective April 15, 2015, for the 2012 annual $PM_{2.5}$ standard.
$PM_{2.5}$	Unclassifiable or attainment effective December 13, 2009, for the 2006 24-hour $PM_{2.5}$ standard.
PM_{10}	Unclassifiable effective November 15, 1990.
NO_2	Unclassifiable or attainment effective January 29, 2012, for the 2010 NO_2 standard.
Pb	Unclassifiable or attainment effective December 31, 2011, for the 2008 lead standard.

(a) Ozone Standards
Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to ozone. Elkhart County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) $PM_{2.5}$
Elkhart County has been classified as attainment for $PM_{2.5}$. Therefore, direct $PM_{2.5}$, SO_2, and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(c) Other Criteria Pollutants
Elkhart County has been classified as attainment or unclassifiable in Indiana for all the other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

Since this type of operation is not one (1) of the twenty-eight (28) listed source categories under 326 IAC 2-2-1(ff)(1), 326 IAC 2-3-2(g), or 326 IAC 2-7-1(22)(B), and there is no applicable New Source Performance Standard or National Emission Standard for Hazardous Air Pollutants that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

The fugitive emissions of hazardous air pollutants (HAP) are counted toward the determination of Part 70 Permit applicability and source status under Section 112 of the Clean Air Act (CAA).

Greenhouse Gas (GHG) Emissions

On June 23, 2014, in the case of *Utility Air Regulatory Group v. EPA*, cause no. 12-1146, (available at http://www.supremecourt.gov/opinions/13pdf/12-1146_4g18.pdf) the United States Supreme Court ruled that the U.S. EPA does not have the authority to treat greenhouse gases (GHGs) as an air pollutant for the purpose of determining operating permit applicability or PSD Major source status. On July 24, 2014, the U.S. EPA issued a memorandum to the Regional Administrators outlining next steps in permitting decisions in light of the Supreme Court's decision. U.S. EPA's guidance states that U.S. EPA will no longer require PSD or Title V permits for sources "previously classified as 'Major' based solely on greenhouse gas emissions."

The Indiana Environmental Rules Board adopted the GHG regulations required by U.S. EPA at 326 IAC 2-2-1(zz), pursuant to Ind. Code § 13-14-9-8(h) (Section 8 rulemaking). A rule, or part of a rule, adopted under Section 8 is automatically invalidated when the corresponding federal rule, or part of the rule, is invalidated. Due to the United States Supreme Court Ruling, IDEM, OAQ cannot consider GHG emissions to determine operating permit applicability or PSD applicability to a source or modification.

Source Status - Existing Source

The table below summarizes the potential to emit of the entire source, prior to the proposed modification, after consideration of all enforceable limits established in the effective permits. If the control equipment has been determined to be integral, the table reflects the potential to emit (PTE) after consideration of the integral control device.

	Source-Wide Emissions Prior to Modification (ton/year)								
	PM[1]	**PM_{10}[1]**	**$PM_{2.5}$[1, 2]**	**SO_2**	**NO_X**	**VOC**	**CO**	**Single HAP[3]**	**Total HAPs**
Total PTE of Entire Source Excluding Fugitive Emissions*	48.10	48.62	48.62	0.13	10.30	247.60	7.91	394.04 (Styrene)	462.19
Title V Major Source Thresholds	NA	100	100	100	100	100	100	10	25
PSD Major Source Thresholds	250	250	250	250	250	250	250	--	--

[1]Under the Part 70 Permit program (40 CFR 70), PM_{10} and $PM_{2.5}$, not particulate matter (PM), are each considered as a "regulated air pollutant."
[2]$PM_{2.5}$ listed is direct $PM_{2.5}$.
[3]Single highest source-wide HAP
*Fugitive HAP emissions are always included in the source-wide emissions.

(a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no PSD regulated pollutant is emitted at a rate of two hundred fifty (250) tons per year or more and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1).

(b) This existing source is a major source of HAP, as defined in 40 CFR 63.2, because HAP emissions are equal to or greater than ten (10) tons per year for a single HAP and equal to or greater than twenty-five (25) tons per year for a combination of HAPs.

(c) These emissions are based on the TSD of Part 70 Renewal No. 039-41837-00073, issued on December 4, 2019.

Description of Proposed Modification

The Office of Air Quality (OAQ) has reviewed an application, submitted by Smoker Craft, Incorporated on September 29, 2020, relating to the addition of one (1) new gel coat booth as follows:

One (1) gel coat booth, identified as 24/25-4GC, approved in 2020 for construction, using mechanical non-atomized application, with a maximum capacity of 1.0 unit per hour, using dry filters for particulate control and exhausting to Stack 24/25-4GCS.

[Under 40 CFR 63, Subpart VVVV, this unit is considered an affected source.]

Enforcement Issues

There are no pending enforcement actions related to this modification.

Emission Calculations

See Appendix A of this Technical Support Document for detailed emission calculations.

Permit Level Determination – Part 70 Modification to an Existing Source

Pursuant to 326 IAC 2-1.1-1(12), Potential to Emit is defined as "the maximum capacity of a stationary source or emission unit 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, IDEM, or the appropriate local air pollution control agency."

The following table is used to determine the appropriate permit level under 326 IAC 2-7-10.5. This table reflects the PTE before controls. If the control equipment has been determined to be integral, the table reflects the potential to emit (PTE) after consideration of the integral control device.

	PTE Before Controls of the New Emission Units (ton/year)								
Process / Emission Unit	**PM**	**PM_{10}**	**$PM_{2.5}$[1]**	**SO_2**	**NO_X**	**VOC**	**CO**	**Single HAP[2]**	**Total HAPs**
Gel coat booth 24/25-4GC	19.78	19.78	19.78	-	-	55.63	-	42.79 (Styrene)	42.79
Total PTE Before Controls of the New Emission Units:	**19.78**	**19.78**	**19.78**	**-**	**-**	**55.63**	**-**	**42.79 (Styrene)**	**42.79**

[1]$PM_{2.5}$ listed is direct $PM_{2.5}$.
[2]Single highest HAP.

Appendix A of this TSD reflects the detailed potential emissions of the modification.

(a) Approval to Construct

Pursuant to 326 IAC 2-7-10.5(g)(4), a Significant Source Modification is required because this modification has the potential to emit VOC at equal to or greater than twenty-five (25) tons per year.

Pursuant to 326 IAC 2-7-10.5(g)(6), a Significant Source Modification is required because this modification has a potential to emit equal to or greater than ten (10) tons per year of a single HAP and twenty-five (25) tons per year of any combination of HAPs.

(b) Approval to Operate

Pursuant to 326 IAC 2-7-12(d)(1), this change to the permit is being made through a Significant Permit Modification because this modification does not qualify as a Minor Permit Modification or as an Administrative Amendment.

Pursuant to 326 IAC 2-7-12(d)(1), this change to the permit is being made through a Significant Permit Modification because this modification makes a significant change to existing monitoring conditions (addition of compliance monitoring for a new control) and incorporating VOC emissions to the existing VOC PSD minor limit.

Permit Level Determination – PSD

The table below summarizes the potential to emit of the modification, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of the Part 70 source and permit modification, and only to the extent that the effect of the control equipment is made practically enforceable in the permit. If the control equipment has been determined to be integral, the table reflects the potential to emit (PTE) after consideration of the integral control device.

	Project Emissions (ton/year)						
Process / Emission Unit	**PM**	**PM_{10}**	**$PM_{2.5}$[1]**	**SO_2**	**NO_X**	**VOC**	**CO**
Gel coat booth 24/25-4GC	0.98	0.98	0.98	-	-	55.63*	-
Total for Modification	**0.98**	**0.98**	**0.98**	**-**	**-**	**55.63**	**-**
PSD Major Source Thresholds	250	250	250	250	250	250	250
[1]$PM_{2.5}$ listed is direct $PM_{2.5}$.							

The source opted to take limit(s) in order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable to this modification. See Technical Support Document (TSD) State Rule Applicability - Entire Source section, and 326 IAC 2-2 (PSD) for more information regarding the limit(s).

This modification to an existing minor PSD stationary source is not major because the emissions increase of each PSD regulated pollutant is less than the PSD major source threshold. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

Note* The source plans to include the new Gel coat booth 24/25-4GC in the existing source-wide VOC PSD Minor limit of 247 tons per year. The VOC emissions in the table above indicate the maximum unlimited potential emissions from the Gel coat booth 24/25-4GC.

PTE of the Entire Source After Issuance of the Part 70 Modification

The table below summarizes the after issuance source-wide potential to emit, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of the Part 70 source and permit modification, and only to the extent that the effect of the control equipment is made practically enforceable in the permit. If the control equipment has been determined to be integral, the table reflects the potential to emit (PTE) after consideration of the integral control device.

	Source-Wide Emissions After Issuance (ton/year)								
	PM[1]	**PM_{10}[1]**	**$PM_{2.5}$[1, 2]**	**SO_2**	**NO_X**	**VOC**	**CO**	**Single HAP[3]**	**Total HAPs**
Total PTE of Entire Source Excluding Fugitives*	48.52	49.04	49.04	0.13	10.30	247.60	7.91	436.84 (Styrene)	504.98
Title V Major Source Thresholds	NA	100	100	100	100	100	100	10	25
PSD Major Source Thresholds	250	250	250	250	250	250	250	--	--

[1]Under the Part 70 Permit program (40 CFR 70), PM_{10} and $PM_{2.5}$, not particulate matter (PM), are each considered as a "regulated air pollutant."
[2]$PM_{2.5}$ listed is direct $PM_{2.5}$.
[3]Single highest source-wide HAP
*Fugitive HAP emissions are always included in the source-wide emissions.

The source opted to take limit(s) in order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable to this source. See Technical Support Document (TSD) State Rule Applicability - Entire Source section, 326 IAC 2-2 (PSD) for more information regarding the limit(s).

(a) This existing minor PSD stationary source will continue to be minor under 326 IAC 2-2 because the emissions of each PSD regulated pollutant will continue to be less than the PSD major source thresholds.

(b) This existing major source of HAP will continue to be a major source of HAP, as defined in 40 CFR 63.2, because HAP emissions will continue to be equal to or greater than ten (10) tons per year for any single HAP and/or equal to or greater than twenty-five (25) tons per year of a combination of HAPs. Therefore, this source is a major source under Section 112 of the Clean Air Act (CAA).

Federal Rule Applicability Determination

Due to the modification at this source, federal rule applicability has been reviewed as follows:

New Source Performance Standards (NSPS):

There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this proposed modification.

National Emission Standards for Hazardous Air Pollutants (NESHAP):

(a) The new gel coat booth 24/25-4GC is subject to the National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing, 40 CFR 63, Subpart VVVV, which is incorporated by reference as 326 IAC 2, because source operates a fiberglass boat manufacturing facility and is a major source of HAP.

Several existing emission units at the source have been previously determined to be subject to this rule.

This new gel coat booth 24/25-4GC is subject to the following portions of Subpart VVVV:

(1) 40 CFR 63.5680
(2) 40 CFR 63.5683

(3) 40 CFR 63.5689
(4) 40 CFR 63.5692
(5) 40 CFR 63.5695
(6) 40 CFR 63.5698
(7) 40 CFR 63.5701(a), (b)
(8) 40 CFR 63.5704(a), (b)
(9) 40 CFR 63.5707
(10) 40 CFR 63.5710
(11) 40 CFR 63.5713
(12) 40 CFR 63.5714
(13) 40 CFR 63.5728
(14) 40 CFR 63.5731
(15) 40 CFR 63.5734
(16) 40 CFR 63.5737
(17) 40 CFR 63.5740
(18) 40 CFR 63.5743
(19) 40 CFR 63.5746
(20) 40 CFR 63.5749
(21) 40 CFR 63.5752
(22) 40 CFR 63.5753
(23) 40 CFR 63.5755
(24) 40 CFR 63.5758
(25) 40 CFR 63.5761
(26) 40 CFR 63.5764(a), (b), (c)
(27) 40 CFR 63.5767(a), (b), (c)
(28) 40 CFR 63.5770
(29) 40 CFR 63.5773
(30) 40 CFR 63.5776
(31) 40 CFR 63.5779
(32) Table 1 to 40 CFR 63, Subpart VVVV
(33) Table 2 to 40 CFR 63, Subpart VVVV
(34) Table 3 to 40 CFR 63, Subpart VVVV
(35) Table 5 to 40 CFR 63, Subpart VVVV
(36) Table 6 to 40 CFR 63, Subpart VVVV
(37) Table 7 to 40 CFR 63, Subpart VVVV
(38) Table 8 to 40 CFR 63, Subpart VVVV

The requirements of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated as 326 IAC 20-1, apply to the new gel coat booth 24/25-4GC except as otherwise specified in 40 CFR 63, Subpart VVVV.

(b) There are no other National Emission Standards for Hazardous Air Pollutants under 40 CFR 63, 326 IAC 14 and 326 IAC 20 included for this proposed modification.

Compliance Assurance Monitoring (CAM):

(a) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to each pollutant-specific emission unit that meets the following criteria:

(1) has a potential to emit before controls equal to or greater than the major source threshold for the regulated pollutant involved;

(2) is subject to an emission limitation or standard for that pollutant (or a surrogate thereof); and

(3) uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.

(b) Pursuant to 40 CFR 64.2(b)(1)(i), emission limitations or standards proposed after November 15, 1990 pursuant to a NSPS or NESHAP under Section 111 or 112 of the Clean Air Act are exempt from the requirements of CAM. Therefore, an evaluation was not conducted for any emission limitations or standards proposed after November 15, 1990 pursuant to a NSPS or NESHAP under Section 111 or 112 of the Clean Air Act.

Emission Unit/Pollutant	Control Device	Applicable Emission Limitation	Uncontrolled PTE (tons/year)	Controlled PTE (tons/year)	CAM Applicable (Y/N)	Large Unit (Y/N)
Gel coat booth 24/25-4GC/ PM*	DF	326 IAC 6-3-2	<100	-	N [1]	-
Gel coat booth 24/25-4GC/ PM	DF	326 IAC 2-2	-	-	N [2]	-
Gel coat booth 24/25-4GC/ PM10	DF	326 IAC 2-2	<100	-	N [1]	-
Gel coat booth 24/25-4GC/ PM2.5	DF	326 IAC 2-2	<100	-	N [1]	-

Under the Part 70 Permit program (40 CFR 70), PM is not a regulated air pollutant.
Uncontrolled PTE (tpy) and controlled PTE (tpy) are evaluated against the Major Source Threshold for each pollutant. Major Source Threshold for regulated air pollutants (PM10, PM2.5, SO2, NOx, VOC and CO) is 100 tpy, for a single HAP ten (10) tpy, and for total HAPs twenty-five (25) tpy.

PM*	For limitations under 326 IAC 6-3-2, 326 IAC 6.5, and 326 IAC 6.8, IDEM OAQ uses PM as a surrogate for the regulated air pollutant PM10. Therefore, uncontrolled PTE and controlled PTE reflect the emissions of the regulated air pollutant PM10.
N [1]	CAM does not apply for pollutant because the uncontrolled PTE of pollutant is less than the major source threshold.
N [2]	Under 326 IAC 2-2, PM is not a surrogate for a regulated air pollutant. Therefore, CAM does not apply to these emission units for the 326 IAC 2-2 PM limitation.

Controls: DF = Dry Filters

Based on this evaluation, the requirements of 40 CFR Part 64, CAM, are not applicable to the new gel coat booth 24/25-4GC as part of this modification.

State Rule Applicability - Entire Source

Due to this modification, state rule applicability has been reviewed as follows:

326 IAC 2-2 (PSD) and 326 IAC 2-3 (Emission Offset)
PSD and Emission Offset applicability is discussed under the Permit Level Determination – PSD section and the Permit Level Determination - PSD Emissions Increase section of this document.

PSD Minor Source Limits

VOC
The source still has unlimited VOC PTE of greater than 250 tons per year, and has opted to include the new gel coat booth 24/25-4GC in the existing source-wide VOC PSD Minor limit as follows:

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the combined VOC emissions from the facilities listed below shall not exceed 247 tons per twelve (12) consecutive month period, with compliance determined at the end of each month:

Twenty three (23) Glue Stations
Five (5) Airless Paint Booths
One (1) HVLP Paint Booth
One (1) portable catalyst/fiber resin chop gun
Six (6) stationary catalyst/fiber resin chop guns
~~Three~~ **Four** (~~3~~ **4**) gel coat booths
Two (2) Gel coat touch-up operations
One (1) Paint touch-up operation
One (1) Polyurethane Boat Lining Operation

Compliance with these limits, combined with the potential to emit VOC from all other emission units at this source, shall limit the source-wide total potential to emit of VOC to less than 250 tons per twelve (12) consecutive month period, and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The provisions of 326 IAC 2-4.1 apply to any owner or operator who constructs or reconstructs a major source of hazardous air pollutants (HAP), as defined in 40 CFR 63.41, after July 27, 1997, unless the major source has been specifically regulated under or exempted from regulation under a NESHAP that was issued pursuant to Section 112(d), 112(h), or 112(j) of the Clean Air Act (CAA) and incorporated under 40 CFR 63. On and after June 29, 1998, 326 IAC 2-4.1 is intended to implement the requirements of Section 112(g)(2)(B) of the Clean Air Act (CAA).

The operation of this source will still emit equal to or greater than ten (10) tons per year for a single HAP and equal to or greater than twenty-five (25) tons per year for a combination of HAPs. Therefore, 326 IAC 2-4.1 would apply to this source. However, pursuant to 326 IAC 2-4.1-1(b)(2), because all units with a potential to emit greater than ten (10) tons per year for a single HAP and greater than twenty-five (25) tons per year for a combination of HAPs are specifically regulated under NESHAP 40 CFR 63, Subpart VVVV, which was issued pursuant to Section 112(d) of the CAA, this source is exempt from the requirements of 326 IAC 2-4.1.

326 IAC 2-6 (Emission Reporting)
This source is subject to the requirements of 326 IAC 2-6 (Emission Reporting), since it is required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program. Pursuant to 326 IAC 2-6-3(a)(2), the Permittee shall submit triennially, by July 1, an emission statement covering the previous calendar year in accordance with the compliance schedule in 326 IAC 2-6-3. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

326 IAC 2-7-6(5) (Annual Compliance Certification)
The U.S. EPA Federal Register 79 FR 54978 notice does not exempt Title V Permittees from the requirements of 40 CFR 70.6(c)(5)(iv) or 326 IAC 2-7-6(5)(D), but the submittal of the Title V annual compliance certification to IDEM satisfies the requirement to submit the Title V annual compliance certifications to EPA. IDEM does not intend to revise any permits since the requirements of 40 CFR 70.6(c)(5)(iv) or 326 IAC 2-7-6(5)(D) still apply, but Permittees can note on their Title V annual compliance certifications that submission to IDEM has satisfied reporting to EPA per Federal Register 79 FR 54978. This only applies to Title V Permittees and Title V compliance certifications.

326 IAC 5-1 (Opacity Limitations)
This source is subject to the opacity limitations specified in 326 IAC 5-1-2(2)

326 IAC 6-4 (Fugitive Dust Emissions Limitations)
Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source 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.

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)
This source is not subject to the requirements of 326 IAC 6-5, because the source has potential fugitive particulate emissions of less than twenty-five (25) tons per year.

326 IAC 6.5 (Particulate Matter Limitations Except Lake County)
Pursuant to 326 IAC 6.5-1-1(a), this source (located in Elkhart County) is not subject to the requirements of 326 IAC 6.5 because it is not located in one of the following counties: Clark, Dearborn, Dubois, Howard, Marion, St. Joseph, Vanderburgh, Vigo or Wayne.

326 IAC 6.8 (Particulate Matter Limitations for Lake County)
Pursuant to 326 IAC 6.8-1-1(a), this source (located in Elkhart County) is not subject to the requirements of 326 IAC 6.8 because it is not located in Lake County.

326 IAC 6.8-10 (Lake County: Fugitive Particulate Matter)
Pursuant to 326 IAC 6.8-10-1, this source (located in Elkhart County) is not subject to the requirements of 326 IAC 6.8-10 because it is not located in Lake County.

326 IAC 20-48 (Emission Standards for Hazardous Air Pollutants for Boat Manufacturing)
This source is still subject to 326 IAC 20-48 because the source is a fiberglass boat manufacturing facility, a major source of HAPs and is subject to the requirements of 40 CFR 63, Subpart VVVV, which is incorporated by reference as 326 IAC 20-48.

The source shall continue to comply with the following existing requirements:

(1) Pursuant to 326 IAC 20-48-2, in addition to alternative organic HAP content requirements for open molding resin operations contained in Table 2 to Subpart VVVV, 40 CFR 63, the alternative HAP content requirements for gel coat operations are as follows:

Gel Coat Application		
For this operation	And this application method	You must not exceed this weighted average percent organic HAP content (weight percent) requirement
Pigmented Gel Coat Operations	Atomized (spray)	33%
Pigmented Gel Coat Operations	Nonatomized (nonspray)	40%
Clear Gel Coat Operations	Atomized (spray)	48%
Clear Gel Coat Operations	Nonatomized (nonspray)	55%
Tooling Gel Coat Operations	Atomized (spray)	40%
Tooling Gel Coat Operations	Nonatomized (nonspray)	54%

(2) Pursuant to 326 IAC 20-48-3, in addition to the requirements imposed by 40 CFR 63.5731 and 40 CFR 63.5734(b), the following work practice standards are required:

(A) Nonatomizing spray equipment shall not be operated at pressures that atomize the material during the application process.

(B) Solvents sprayed during cleanup and resin changes shall be directed into solvent collection containers.

(C) For routine flushing of resin and gel coat application equipment, such as spray guns, flowcoaters, brushes, rollers, and squeegees, owners or operators must use a cleaning solvent that contains no hazardous air pollutants (HAP). However, recycled cleaning solvents that contain less than or equal to five (5) percent HAP by weight are considered to contain no HAP for the purposes of this condition. For removing cured resin or gel coat from application equipment, no organic HAP limit applies.

(D) Clean-up rags with solvent shall be stored in closed containers.

(E) Closed containers shall be used for the storage of the following:

(i) All production and tooling resins that contain HAP.

(ii) All production and tooling gel coats that contain HAP.

(iii) Waste resins and gel coats that contain HAP.

(iv) Cleaning materials, including waste cleaning materials.

(v) Other materials that contain HAP.

(vi) The covers of the closed containers must have no visible gaps and must be in place at all times, except when equipment is placed in or removed from the container.

(3) Pursuant to 326 IAC 20-48-4, the Permittee shall comply with the following operator training:

(A) Train all new and existing personnel, including contract personnel, who are involved in resin and gel coat spraying and applications that could result in excess emissions if performed improperly according to the following schedule:

(i) All personnel hired shall be trained within fifteen (15) days of hiring.

(ii) To ensure training goals listed in paragraph (b) of this condition are maintained, all personnel shall be given refresher training annually.

(iii) Personnel who have been trained by another owner or operator subject to this rule are exempt from paragraph (a)(1) of this condition if written documentation that the employee's training is current is provided to the new employer.

(B) The lesson plans shall cover, for the initial and refresher training, at a minimum, all of the following topics:

(i) Appropriate application techniques.

(ii) Appropriate equipment cleaning procedures.

(iii) Appropriate equipment setup and adjustment to minimize material usage and overspray.

(C) Maintain the following training records on site and available for inspection and review:

(i) A copy of the current training program.

(ii) A list of all current personnel, by name, that are required to be trained and the dates they were trained and the date of the most recent refresher training.

(D) Records of prior training programs and former personnel are not required to be maintained.

State Rule Applicability – Individual Facilities

Due to this modification, state rule applicability has been reviewed as follows:

Gel coat booth 24/25-4GC

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(a), the requirements of 326 IAC 6-3-2 are applicable to the new gel coat booth 24/25-4GC, since it is a manufacturing process not exempted from this rule under 326 IAC 6-3-1(b) and is not subject to a particulate matter limitation that is as stringent as or more stringent than the particulate limitation established in this rule as specified in 326 IAC 6-3-1(c).

Particulate from the new gel coat booth 24/25-4GC shall be controlled by a dry particulate filter and the Permittee shall operate the control device in accordance with manufacturer's specifications.

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
Even though, the new gel coat booth 24/25-4GC was constructed after January 1, 1980, it is not subject to the requirements of 326 IAC 8-1-6 pursuant to 8-1-6(3)(b) because it is regulated by 326 IAC 20-48.

326 IAC 20 (Hazardous Air Pollutants)
See Federal Rule Applicability and State Rule Applicability - Entire Source Sections of this TSD.

Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-7 are required to assure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions; however, these provisions do not always fulfill the requirement for a 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 Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

If the Compliance Determination Requirements are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in 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.

(a) The Compliance Determination Requirements applicable to this modification are as follows:

The source will continue to demonstrate compliance with the VOC limit by keeping records of their total resins, gel coats, catalysts, surface coatings, adhesives, dilution solvents, cleaning solvents, and degreasing solvents usage and VOC and HAP contents of each resin, gel coat, catalyst, surface coating, adhesive, dilution solvent and cleaning solvent.

VOC and HAPs emissions from the open molding operations shall be calculated by multiplying the monthly usage of each resin and gel coat by the emission factor provided in "Unified Emission Factors for Open Molding of Composites," Composites Fabricators Association, October 13, 2009, or its updates.

VOC emissions from the open molding operations catalyst shall be calculated by multiplying the monthly usage of the catalyst by the emission factor provided in "Emission Factors for Liquid Organic Peroxide Catalysts used in the Open Molding of Composites."

The emission factors for all other VOC emitting compounds shall be 100% of the input of volatile

organic compounds.

Testing Requirements:

There are no testing requirements applicable to this source.

(b) The Compliance Monitoring Requirements applicable to this proposed modification are as follows:

Emission Unit	**Type of Parametric Monitoring**	**Frequency**	**Range or Specification**
Gel coat booth 24/25-4GC	Dry Filter Inspections	Daily	Verify the placement, integrity and particle loading of the filters
	Observations for stack overspray	Weekly	Verify if there is an overspray condition that should result in a response
	Inspections for stack emissions and presence of overspray	Monthly	Verify if there is a noticeable change in overspray emissions or evidence of overspray

These monitoring conditions are necessary because the dry filter for the gel coat booth 24/25-4GC must operate properly to assure compliance with 326 IAC 6-3 (Particulate Emissions Limitations for Manufacturing Processes).

Proposed Changes

As part of this permit approval, the permit may contain new or different permit conditions and some conditions from previously issued permits/approvals may have been corrected, changed, or removed. These corrections, changes, and removals may include Title I changes.

The following changes listed below are due to the proposed modification. Deleted language appears as ~~strikethrough~~ text and new language appears as **bold** text (these changes may include Title I changes):

(1) IDEM, OAQ has added a new emission unit to the permit.

(2) IDEM, OAQ has included the new gel coat booth 24/25-4GC in the existing source-wide VOC PSD Minor limit

(3) IDEM, OAQ has added new Compliance Monitoring Requirement to the permit.

A.3 Emission Units and Pollution Control Equipment Summary
[326 IAC 2-7-4(c)(3)][326 IAC 2-7-5(14)]

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

(f) ~~Three~~ **Four** (~~3~~ **4**) gel coat booths, ~~using air-assisted airless spray guns~~, each with a maximum capacity of 1.0 unit per hour, using dry filters for particulate control and consisting of the following:

Emission Unit ID	Year Constructed	**Gel Coat Application Method**	Stack
24/25-1GC	Prior to 1980	**Air-assisted airless**	24/25-1GC**S**
24/25-2GC			24/25-1GC**S**
24/25-3GC	2008		24/25-3GC**S**

Emission Unit ID	Year Constructed	**Gel Coat Application Method**	Stack
24/25-4GC	**Approved in 2020 for Construction**	**Mechanical non-atomized**	**24/25-4GCS**

……

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:
……

(f) ~~Three~~ **Four** (~~3~~ **4**) gel coat booths, ~~using air-assisted airless spray guns~~, each with a maximum capacity of 1.0 unit per hour, using dry filters for particulate control and consisting of the following:

Emission Unit ID	Year Constructed	**Gel Coat Application Method**	Stack
24/25-1GC	Prior to 1980	**Air-assisted airless**	24/25-1GC**S**
24/25-2GC			24/25-1GC**S**
24/25-3GC	2008		24/25-3GC**S**
24/25-4GC	**Approved in 2020 for Construction**	**Mechanical non-atomized**	**24/25-4GCS**

…….

(The information describing the process contained in this emissions unit 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) PSD Minor Limit [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the combined VOC emissions from the facilities listed below shall not exceed 247 tons per twelve (12) consecutive month period, with compliance determined at the end of each month:

Twenty three (23) Glue Stations
Five (5) Airless Paint Booths
One (1) HVLP Paint Booth
One (1) portable catalyst/fiber resin chop gun
Six (6) stationary catalyst/fiber resin chop guns
~~Three~~ **Four** (~~3~~ **4**) gel coat booths
Two (2) Gel coat/final finish touch-up operations
One (1) Paint touch-up operation
One (1) Polyurethane Boat Lining Operation

Compliance with this limit, combined with the potential to emit VOC from all other emission units at this source, shall limit the source-wide total potential to emit of VOC to less than 250 tons per twelve (12) consecutive month period and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable

D.1.2 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(d), particulate from the following shall be controlled by dry filters, and the Permittee shall operate the control devices in accordance with manufacturer's specifications:

Paint Booths
…….
Gel Coat Booths
24/25-1GC
24/25-2GC
24/25-3GC
24/25-4GC

……

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

D.1.8 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity, and particle loading of the filters controlling the following:

Paint Booths
……
Gel Coat Booths
24/25-1GC
24/25-2GC
24/25-3GC
24/25-4GC

(b) To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the stacks of the following while one or more of the booths are in operation:

Paint Booths
……
Gel Coat Booths
24/25-1GC
24/25-2GC
24/25-3GC
24/25-4GC

If a condition exists which should result in a response step, the Permittee shall take reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

(c) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground of the following:

Paint Booths
……..
Gel Coat Booths
24/25-1GC
24/25-2GC
24/25-3GC
24/25-4GC

When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation

with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

…….

SECTION E.1 NESHAP

Emissions Unit Description:

……

(f) ~~Three~~ **Four** (~~3~~ **4**) gel coat booths, ~~using air-assisted airless spray guns~~, each with a maximum capacity of 1.0 unit per hour, using dry filters for particulate control and consisting of the following:

Emission Unit ID	Year Constructed	**Gel Coat Application Method**	Stack
24/25-1GC	Prior to 1980	**Air-assisted airless**	24/25-1GC**S**
24/25-2GC			24/25-1GC**S**
24/25-3GC	2008		24/25-3GC**S**
24/25-4GC	**Approved in 2020 for Construction**	**Mechanical non-atomized**	**24/25-4GCS**

…….

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

……

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH

Part 70 Quarterly Report

Source Name: Smoker Craft, Incorporated
Source Address: 68143 Clunette Street and 67977 Division Street, New Paris, Indiana 46553
Part 70 Permit No.: 039-41837-00073
Facility:

Twenty three (23) Glue Stations
Five (5) Airless Paint Booths
One (1) HVLP Paint Booth
One (1) portable catalyst/fiber resin chop gun
Six (6) stationary catalyst/fiber resin chop guns
~~Three~~ **Four** (~~3~~ **4**) gel coat booths
Two (2) Gel coat/final finish touch-up operations
One (1) Paint touch-up operation
One (1) Polyurethane Boat Lining Operation

Parameter: Combined VOC Emissions
Limit: Shall not exceed 247 tons per twelve (12) consecutive month period, with compliance determined at the end of each month

……

Conclusion and Recommendation

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 September 29, 2020.

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Source Modification No. 039-43320-00073. The operation of this proposed modification shall be subject to the conditions of the attached proposed Significant Permit Modification No. 039-43322-00073.

The staff recommends to the Commissioner that the Part 70 Significant Source Modification and Significant Permit Modification be approved.

IDEM Contact

(a) If you have any questions regarding this permit, please contact OlajumokeKayode, Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251, or by telephone at (317) 234-5373 or (800) 451-6027, and ask for OlajumokeKayode or (317) 234-5373.

(b) A copy of the findings is available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/

(c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Air Permits page on the Internet at: http://www.in.gov/idem/airquality/2356.htm; and the Citizens' Guide to IDEM on the Internet at: http://www.in.gov/idem/6900.htm.

Appendix A: Emission Calculations
PTE Summary

Company Name: Smoker Craft, Inc.
Address City IN Zip: 68143 Clunette St. & 67977 Division St., New Paris, IN 46553
Significant Source Modification No: 039-43320-00073
Significant Permit Modification No: 039-43322-00073
Reviewer: Olajumoke Kayode

Uncontrolled Potential to Emit (tons/yr)								
Emission Unit	**PM**	**PM10**	**PM2.5 ***	**SO_2**	**NOx**	**VOC**	**CO**	**Total HAPs**
Glue Stations	-	-	-	-	-	27.33	-	-
Airless Paint Booths	33.11	33.11	33.11	-	-	99.80	-	52.26
HVLP Paint Booth	8.28	8.28	8.28	-	-	24.95	-	13.07
portable catalyst/fiber resin chop gun	-	-	-	-	-	37.82	-	37.71
stationary catalyst/fiber resin chop guns	-	-	-	-	-	227.85	-	227.17
gel coat booths	57.93	57.93	57.93	-	-	243.81	-	171.96
grinding and cutting operations	13.55	13.55	13.55	-	-	-	-	-
Vacuum Operation	2.82	2.82	2.82	-	-	-	-	-
Polyurethane Boat Lining Operation	5.06	5.06	5.06	-	-	-	-	1.85
Gel coat touch-up	-	-	-	-	-	0.44	-	-
Paint touch-up	-	-	-	-	-	0.97	-	0.53
Woodworking**	0.69	0.69	0.69	-	-	-	-	-
Welding	2.92	2.92	2.92	-	-	-	-	0.27
Natural Gas-Fired Combustion	0.17	0.69	0.69	0.05	9.10	0.50	7.65	0.17
diesel-fired emergency stationary fire pump	0.09	0.09	0.09	0.08	1.20	0.10	0.26	1.05E-03
Total	**124.59**	**125.11**	**125.11**	**0.13**	**10.30**	**663.57**	**7.91**	**504.98**
Fugitive Emissions								
Paved Roads	*1.42*	*0.28*	*0.07*	-	-	-	-	-

Notes:
** PM2.5 listed is direct PM2.5*
** * Control devices for woodworking operations are considered integral to the process. Therefore, PTE is considered after control*

Potential to Emit after Issuance (tons/yr)								
Emission Unit	**PM**	**PM10**	**PM2.5 ***	**SO_2**	**NOx**	**VOC**	**CO**	**Total HAPs**
Glue Stations	-	-	-	-	-	247.00	-	-
Airless Paint Booths	33.11	33.11	33.11	-	-		-	52.26
HVLP Paint Booth	8.28	8.28	8.28	-	-		-	13.07
portable catalyst/fiber resin chop gun	-	-	-	-	-		-	37.71
stationary catalyst/fiber resin chop guns	-	-	-	-	-		-	227.17
gel coat booths	2.86	2.86	2.86	-	-		-	171.96
grinding and cutting operations	0.14	0.14	0.14	-	-		-	-
Vacuum Operation	0.03	0.03	0.03	-	-		-	-
Polyurethane Boat Lining Operation	0.25	0.25	0.25	-	-		-	1.85
Gel coat touch-up	-	-	-	-	-		-	-
Paint touch-up	-	-	-	-	-		-	0.53
Woodworking	0.69	0.69	0.69	-	-	-	-	-
Welding	2.92	2.92	2.92	-	-	-	-	0.27
Natural Gas-Fired Combustion	0.17	0.69	0.69	0.05	9.10	0.50	7.65	0.17
diesel-fired emergency stationary fire pump	0.09	0.09	0.09	0.08	1.20	0.10	0.26	1.05E-03
Total	**48.52**	**49.04**	**49.04**	**0.13**	**10.30**	**247.60**	**7.91**	**504.98**
Fugitive Emissions								
Paved Roads	*1.42*	*0.28*	*0.07*	-	-	-	-	-

** PM2.5 listed is direct PM2.5*
Note: The shaded cells indicate where limits are included.

Appendix A: Emission Calculations
Summary of HAPs

Company Name: Smoker Craft, Inc.
Address City IN Zip: 68143 Clunette St. & 67977 Division St., New Paris, IN 46553
Significant Source Modification No: 039-43320-00073
Significant Permit Modification No: 039-43322-00073
Reviewer: Olajumoke Kayode

Uncontrolled Potential to Emit HAPs (tons/yr)						
Emission Unit	**Xylene**	**Styrene**	**Manganese**	**Hexane**	**Isocyanates**	**Formaldehyde**
Glue Stations	0.05	-	-	-	-	-
Airless Paint Booths	52.20	-	-	-	-	-
HVLP Paint Booth	13.05	-	-	-	-	-
portable catalyst/fiber resin chop gun	-	37.71	-	-	-	-
stationary catalyst/fiber resin chop guns	-	227.17	-	-	-	-
gel coat booths	-	171.96	-	-	-	-
grinding and cutting operations	-	-	-	-	-	-
Vacuum Operation	-	-	-	-	-	-
Boat Lining Operation	-	-	-	-	1.85	-
Gel coat touch-up	-	-	-	-	-	-
Paint touch-up	0.53	-	-	-	-	-
Woodworking	-	-	-	-	-	-
Welding	-	-	0.27	-	-	-
Natural Gas-Fired Combustion	-	-	3.46E-05	0.16	-	6.83E-03
diesel-fired emergency stationary fire pump	-	-	-	-	-	3.20E-04
Total	**65.83**	**436.84**	**0.27**	**0.16**	**1.85**	**0.01**

Note: The shaded cells indicate the Source-wide worst case HAP

Appendix A: Emission Calculations
New Emissions Summary

Company Name: Smoker Craft, Inc.
Address City IN Zip: 68143 Clunette St. & 67977 Division St., New Paris, IN 46553
Significant Source Modification No: 039-43320-00073
Significant Permit Modification No: 039-43322-00073
Reviewer: Olajumoke Kayode

Uncontrolled Potential to Emit (tons/yr)										
Emission Unit	**PM**	**PM10**	**PM2.5 ***	**SO_2**	**NOx**	**VOC**	**CO**	**Total HAPs**	**Worst HAP**	
Gel coat booth 24/254GC	19.52	19.52	19.52	-	-	55.63	-	42.79	42.79	
Total	**19.52**	**19.52**	**19.52**	**0.00**	**0.00**	**55.63**	**0.00**	**42.79**	**42.79**	**Styrene**

Appendix A: Emissions Calculations
Glue Stations

Company Name: Smoker Craft, Inc.
Address City IN Zip: 68143 Clunette St. & 67977 Division St., New Paris, IN 46553
Significant Source Modification No: 039-43320-00073
Significant Permit Modification No: 039-43322-00073
Reviewer: Olajumoke Kayode

Stations: 2-1GS, 3-1GS, 3-2GS, 5-1GS, 5-2GS, 5-3GS, 5-4GS, 14-1GS, 27-1GS, 27-2GS

Material	Density (lb/gal)	Weight % Volatile (Water & Organics)	Weight % Water	Weight % VOC	Volume % Water	Weight % xylene	Usage rate (gal/unit)	Maximum throughput (unit/hr)	Maximum usage (gal/day)	VOC content (lb/gal coating)	VOC content (lb/gal coating less water)	PTE of VOC (lb/hr)	PTE of VOC (ton/yr)	PTE of HAP (xylene) (ton/yr)	PTE of PM (ton/yr)	Transfer Efficiency
Spray adhesive #737	8.92	31.0%	31%	0.0%	33.2%	-	0.884	1.33	28.28	-	-	-	-	-	-	100%
Mineral spirits	6.51	100.0%	0%	100.0%	0.0%	1.0%	0.013	1.33	0.42	6.51	6.51	0.11	0.49	0.0049	-	100%
											Total per station:	**0.11**	**0.49**	**0.0049**	**-**	
											Total for all 10 stations:	**1.13**	**4.94**	**0.05**	**-**	

Stations: 7-1GS, 7-2GS, 7-3GS,7-4GS, 7-5GS, 7-6GS, 7-7GS, 7-8GS, 7-9GS, 7-10GS, 7-11GS, 7-12GS, 7-13GS

Material	Density (lb/gal)	Weight % Volatile (Water & Organics)	Weight % Water	Weight % VOC	Volume % Water	Usage rate (gal/unit)	Maximum throughpu t (unit/hr)	Maximum usage (gal/day)	VOC content (lb/gal coating)	VOC content (lb/gal coating less water)	PTE of VOC (lb/hr)	PTE of VOC (ton/yr)	PTE of PM (ton/yr)	Transfer Efficiency*
Spray adhesive #7113	6.84	71.3%	36.8%	34.5%	38.1%	0.125	1.33	4.00	2.36	3.81	0.39	1.72	-	100%
Acetone	6.61	100.0%	100%	0.0%	100.0%	0.013	1.33	0.42	0.00	#DIV/0!	0.00	0.00	-	100%
										Total per station:	**0.39**	**1.72**	**-**	
										Total for all 13 stations:	**5.11**	**22.38**	**-**	

Potential to Emit VOC (lbs/hr) for all 23 stations	**6.24**
Potential to Emit VOC (tons/year) for all 23 stations	**27.33**

Notes:
$PM=PM_{10}=PM_{2.5}$
The spray adhesive #737 contains no VOC or HAPs.
*Transfer Efficiency = 100% for Mechnical Non-Atomized Application

Methodology:
Density (lb/gal) = Specific gravity * Density of water (8.34 lb/gal) or Provided in MSDS
Weight % VOC = Weight % Volatile (Water & Organics) - Weight % Water
Volume % Water = Weight % Water * Density (lb/gal) / Density of water (8.34 lb/gal)
Maximum usage (gal/day) = Usage rate (gal/unit) * Maximum throughput (unit/hr) * 24 hrs/day
VOC content (lb/gal coating) = Density (lb/gal) * Weight % VOC
VOC content (lb/gal coating less water) = Density (lb/gal) * Weight % VOC / (1-Volume % Water)
PTE of VOC (lb/hr) = VOC content (lb/gal coating) * Usage rate (gal/unit) * Maximum throughput (unit/hr)
PTE of VOC (lb/day) = PTE of VOC (lb/hr) * 24 hrs/day
PTE of VOC (ton/yr) = PTE of VOC (lb/hr) * 8760 hrs/yr * 1 ton/2000 lbs
PTE of PM (ton/yr) = Usage rate (gal/unit) * Maximum throughput (unit/hr) * Density (lb/gal)* (1-Weight % volatile) * (1-Transfer efficiency) * 8760 hrs/yr * 1 ton/2000 lbs
PTE of HAP (ton/yr) = Usage rate (gal/unit) * Maximum throughput (unit/hr) * Density (lb/gal) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

Appendix A: Emissions Calculations
Paint booths (6-1PB, 6- 2PB, 13-1PB, 13-2PB and 13-3PB)

Company Name: Smoker Craft, Inc.
Address City IN Zip: 68143 Clunette St. & 67977 Division St., New Paris, IN 46553
Significant Source Modification No: 039-43320-00073
Significant Permit Modification No: 039-43322-00073
Reviewer: Olajumoke Kayode

Material	Density (lb/gal)	Weight % Volatile (Water & Organics)	Weight % Water	Weight % VOC	Volume % Water	Usage rate (gal/unit)	Maximum throughput (unit/hr)	Maximum usage (gal/day)	VOC content (lb/gal coating)	VOC content (lb/gal coating less water)	PTE of VOC (lb/hr)	PTE of VOC (lb/day)	PTE of VOC (ton/yr)	PTE of PM (ton/yr)	Transfer Efficiency
Priming operation															
Wash primer 6181P	7.76	81.36%	36.48%	44.88%	42.8%	0.125	1.00	3.00	3.48	6.09	0.44	10.45	1.91	0.28	65%
Acid thinner 6182T	6.96	95.78%	0%	95.78%	0.0%	0.125	1.00	3.00	6.67	6.67	0.83	20.00	3.65	0.06	65%
Painting operation										**Total for priming per booth:**	**1.27**	**30.45**	**5.56**	**0.33**	
Stone White 6202E	9.67	49.44%	0%	49.44%	0.0%	0.750	1.00	18.00	4.78	4.78	3.59	86.06	15.71	5.62	65%
Elpolydur Hardener	8.14	57.26%	0%	57.26%	0.0%	0.1875	1.00	4.50	4.66	4.66	0.87	20.98	3.83	1.00	65%
VM&P Naptha (clean-up)	6.24	100.0%	0%	100.0%	0.0%	0.0156	1.00	0.37	6.24	6.24	0.10	2.34	0.43	-	65%
										Total for painting per booth (worst-case):	**4.56**	**109.37**	**19.96**	**6.62**	
										Total for 5 booths (worst-case):	**22.79**	**546.87**	**99.80**	**33.11**	

HAPs

Material	Density (lb/gal)	Usage rate (gal/unit)	Maximum throughput (unit/hr)	Xylene		Toluene		Zinc Chromate		
				% Weight	PTE (ton/yr)	% Weight	PTE (ton/yr)	% Weight	PTE (ton/yr)	
Priming operation										
Wash primer 6181P	7.76	0.1250	1.0000	-	-	-	-	7.02%	0.019	
Acid thinner 6182T	6.96	0.1250	1.0000	-	-	-	-	-	-	
Painting operation								**Total for priming per booth:**	**0.02**	
Stone White 6202E	9.67	0.7500	1.00	25.84%	8.21	-	-	-	-	
Elpolydur Hardener	8.14	0.1875	1.00	33.19%	2.22	-	-	-	-	
VM&P Naptha (clean-up)	6.24	0.0156	1.00	3.0%	0.01	3.0%	0.01	-	-	**Total HAPs:**
			Total for painting per booth (worst-case):		**10.44**		**0.01**		**-**	**10.45**
			Total for all 5 booths (worst-case):		**52.20**		**0.06**		**-**	**52.26**

Notes:
$PM=PM_{10}=PM_{2.5}$

Methodology:
Weight % Volatile (Water & Organics) = Coating VOC (lb/gal) (as provided in MSDS) / Density (lb/gal)
Weight % VOC = Weight % Volatile (Water & Organics) - Weight % Water
Volume % Water = Weight % Water * Density (lb/gal) / Density of acetone (6.61 lb/gal)
Maximum usage (gal/day) = Usage rate (gal/unit) * Maximum throughput (unit/hr) * 24 hrs/day
VOC content (lb/gal coating) = Density (lb/gal) * Weight % VOC
VOC content (lb/gal coating less water) = Density (lb/gal) * Weight % VOC / (1-Volume % Water)
PTE of VOC (lb/hr) = VOC content (lb/gal coating) * Usage rate (gal/unit) * Maximum throughput (unit/hr)
PTE of VOC (lb/day) = PTE of VOC (lb/hr) * 24 hrs/day
PTE of VOC (ton/yr) = PTE of VOC (lb/hr) * 8760 hrs/yr * 1 ton/2000 lbs
PTE of PM (ton/yr) = Usage rate (gal/unit) * Maximum throughput (unit/hr) * Density (lb/gal)* (1-Weight % volatile) * (1-Transfer efficiency) * 8760 hrs/yr * 1 ton/2000 lbs
PTE of HAP (ton/yr) = Usage rate (gal/unit) * Maximum throughput (unit/hr) * Density (lb/gal) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs
PTE of HAP (zinc chromate) (ton/yr) =PTE of PM (tons/yr) * Weight % zinc chromate

Appendix A: Emissions Calculations
Paint booth (6-3PB)

Company Name: Smoker Craft, Inc.
Address City IN Zip: 68143 Clunette St. & 67977 Division St., New Paris, IN 46553
Significant Source Modification No: 039-43320-00073
Significant Permit Modification No: 039-43322-00073
Reviewer: Olajumoke Kayode

Material	Density (lb/gal)	Weight % Volatile (Water & Organics)	Weight % Water	Weight % VOC	Volume % Water	Usage rate (gal/unit)	Maximum throughput (unit/hr)	Maximum usage (gal/day)	VOC content (lb/gal coating)	VOC content (lb/gal coating less water)	PTE of VOC (lb/hr)	PTE of VOC (lb/day)	PTE of VOC (ton/yr)	PTE of PM (ton/yr)	Transfer Efficiency
Priming operation															
Wash primer 6181P	7.76	81.36%	36.48%	44.88%	42.8%	0.125	1.25	3.75	3.48	6.09	0.54	13.06	2.38	0.35	65%
Acid thinner 6182T	6.96	95.78%	0%	95.78%	0.0%	0.125	1.25	3.75	6.67	6.67	1.04	25.00	4.56	0.07	65%
Painting operation										**Total for priming per booth:**	**1.59**	**38.06**	**6.95**	**0.42**	
Stone White 6202E	9.67	49.44%	0%	49.44%	0.0%	0.750	1.25	22.50	4.78	4.78	4.48	107.58	19.63	7.03	65%
Elpolydur Hardener	8.14	57.26%	0%	57.26%	0.0%	0.1875	1.25	5.63	4.66	4.66	1.09	26.22	4.79	1.25	65%
VM&P Naptha (clean-up)	6.24	100.0%	0%	100.0%	0.0%	0.0156	1.25	0.47	6.24	6.24	0.12	2.92	0.53	-	65%
										Total for painting for booth (worst-case):	**5.70**	**136.72**	**24.95**	**8.28**	

HAPs

Material	Density (lb/gal)	Usage rate (gal/unit)	Maximum throughput (unit/hr)	Xylene		Toluene		Zinc Chromate		
				% Weight	PTE (ton/yr)	% Weight	PTE (ton/yr)	% Weight	PTE (ton/yr)	
Priming operation										
Wash primer 6181P	7.76	0.1250	1.2500	-	-	-	-	7.02%	0.024	
Acid thinner 6182T	6.96	0.1250	1.2500	-	-	-	-	-	-	
Painting operation								**Total for priming per booth:**	**0.02**	
Stone White 6202E	9.67	0.7500	1.25	25.84%	10.26	-	-	-	-	
Elpolydur Hardener	8.14	0.1875	1.25	33.19%	2.77	-	-	-	-	
VM&P Naptha (clean-up)	6.24	0.0156	1.25	3.0%	0.02	3.0%	0.02	-	-	**Total HAPs:**
			Total for painting for booth (worst-case):		**13.05**		**0.02**		**-**	**13.07**

Notes:
$PM=PM_{10}=PM_{2.5}$

Methodology:
Weight % Volatile (Water & Organics) = Coating VOC (lb/gal) (as provided in MSDS) / Density (lb/gal)
Weight % VOC = Weight % Volatile (Water & Organics) - Weight % Water
Volume % Water = Weight % Water * Density (lb/gal) / Density of acetone (6.61 lb/gal)
Maximum usage (gal/day) = Usage rate (gal/unit) * Maximum throughput (unit/hr) * 24 hrs/day
VOC content (lb/gal coating) = Density (lb/gal) * Weight % VOC
VOC content (lb/gal coating less water) = Density (lb/gal) * Weight % VOC / (1-Volume % Water)
PTE of VOC (lb/hr) = VOC content (lb/gal coating) * Usage rate (gal/unit) * Maximum throughput (unit/hr)
PTE of VOC (lb/day) = PTE of VOC (lb/hr) * 24 hrs/day
PTE of VOC (ton/yr) = PTE of VOC (lb/hr) * 8760 hrs/yr * 1 ton/2000 lbs
PTE of PM (ton/yr) = Usage rate (gal/unit) * Maximum throughput (unit/hr) * Density (lb/gal)* (1-Weight % volatile) * (1-Transfer efficiency) * 8760 hrs/yr * 1 ton/2000 lbs
PTE of HAP (ton/yr) = Usage rate (gal/unit) * Maximum throughput (unit/hr) * Density (lb/gal) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs
PTE of HAP (zinc chromate) (ton/yr) =PTE of PM (tons/yr) * Weight % zinc chromate

Appendix A: Emissions Calculations
Reinforced Plastic Composites - Resin

Company Name: Smoker Craft, Inc.
Address City IN Zip: 68143 Clunette St. & 67977 Division St., New Paris, IN 46553
Significant Source Modification No: 039-43320-00073
Significant Permit Modification No: 039-43322-00073
Reviewer: Olajumoke Kayode

Resins

Emission Unit	Emission Unit ID	Material	Density (lb/gal)	Weight % Styrene	Maximum usage (gal/unit)	Maximum throughput (unit/hour)	UEF (lbs Styrene/ton resin)	PTE of styrene (tons/yr)	Transfer efficiency	Uncontrolled PTE of PM (tons/yr)
Portable chop gun	24/25-1RC	Production resin	9.09	35.0%	12.30	2.00	77.0	37.71	100%	-
Stationary chop guns	24/25-2RC - 24/25-7RC	Production resin	9.09	35.0%	74.10	2.00	77.0	227.17	100%	-

Notes:
Assume all monomer in resin is styrene (worst-case).
Unified emission factors (UEF) are from "Unified Emission Factors for Open Molding of Composites," Composites Fabricators Association (October 13, 2009).
Available at: http://www.in.gov/idem/ctap/files/plastics_unified_emission_factors.pdf
Chop guns use mechanical non-atomized (fluid impingement technology (FIT)) application, with 100% transfer efficiency
PM = PM_{10} = $PM_{2.5}$

Methodology:
PTE of VOC/styrene (ton/yr) = Density (lb/gal) * Maximum usage (gal/unit) * Maximum throughput (unit/hr) * UEF (lb VOC or styrene/ton resin) * 1 ton /2000 lbs resin * 8760 hr/yr * 1 ton/2000 lb

Catalyst

Emission Unit	Emission Unit ID	Material	Density (lb/gal)	Weight % MEK	Weight % TPD	Maximum usage (gal/unit)	Maximum throughput (unit/hour)	% of styrene emitted	TPD emission factor (% TPD emitted)	PTE of MEK (tons/yr)	PTE of TPD (tons/yr)	PTE of VOC (tons/yr)	Transfer efficiency	Uncontrolled PTE of PM (tons/yr)
Portable chop gun	24/25-1RC	Cadox D-30	8.34	2.00%	83.0%	0.078	2.00	11.0%	0.01%	0.11	0.0004	0.11	100%	-
Stationary chop guns	24/25-2RC - 24/25-7RC	Cadox D-30	8.34	2.00%	83.0%	0.465	2.00	11.0%	0.01%	0.68	0.0027	0.68	100%	-

Notes:
The catalyst contains methyl ethyl ketone (MEK), methyl ethyl ketone peroxide (MEKP), and 2,2,4-Trimethyl-1,3-pentanediol diisobutanoate (TPD), all of which are non-HAP VOCs.
MEKP in the catalyst is not emitted after being sprayed together with resin because it is immediately consumed by the resin to initiate the curing process.
TPD is a plasticizer performing the same function as dimethyl phthalate (DMP) and also has low vapor pressure (0.003880 mm/Hg at 25 degrees Celsius).
TPD emission factor is based on "Emission Factors for Liquid Organic Peroxide Catalysts used in the Open Molding of Composites",
Robert A. Haberlain, Ph.D., QEP - Engineering Environmental Consulting Services (March 24, 1999)

Methodology:
% sytrene emitted = UEF (lb styrene/ton of resin) * 1 ton/2000 lbs / Weight % styene
TPD emission factor (% TPD emitted) = Vapor pressure of TPD (0.00388 mm Hg) / Vapor pressure of styrene (4.5 mm Hg) * % styrene emitted
PTE of MEK (tons/yr) = Density (lb/gal) * Maximum usage (gal material/unit) * Maximum throughput (unit/hr) * Weight % MEK * 8760 hr/yr * 1 ton/2000 lb

Appendix A: Emissions Calculations
Reinforced Plastic Composites - Gel coat

Company Name: Smoker Craft, Inc.
Address City IN Zip: 68143 Clunette St. & 67977 Division St., New Paris, IN 46553
Significant Source Modification No: 039-43320-00073
Significant Permit Modification No: 039-43322-00073
Reviewer: Olajumoke Kayode

Gel Coats

Emission Unit ID	Material	Density (lb/gal)	Weight % styrene	Weight % MMA	Maximum usage (gal/unit)	Maximum throughput (unit/hour)	UEF (lbs styrene/ton gel)	UEF (lbs MMA/ton gel)	PTE of styrene (tons/yr)	PTE of MMA (tons/yr)	PTE of VOC (tons/yr)	Transfer efficiency	Uncontrolled PTE of PM (tons/yr)	PM control efficiency	Controlled PTE of PM (tons/yr)
24/25-1GC	Tooling gel coat	9.89	31.14%	4.50%	1.147	0.1	277.1	67.5	0.69	0.17	0.86	95%	0.16	95%	0.01
24/25-2GC	Production gel coat	11.11	25.86%	7.00%	11.47	1.0	230.2	105.0	64.24	29.30	93.54	95%	18.74	95%	0.94
	Clear production gel coat	8.79	37.51%	7.47%	2.86	1.0	387.7	112.1	21.34	6.17	27.52	95%	3.03	95%	0.15
	Tooling gel coat	9.89	31.14%	4.50%	1.147	1.0	277.1	67.5	6.88	1.68	8.56	95%	1.60	95%	0.08
								Worst-case:	**64.24**	**29.30**	**93.54**		**18.74**		**0.94**
24/25-3GC	Production gel coat	11.11	25.86%	7.00%	11.47	1.0	230.2	105.0	64.24	29.30	93.54	95%	18.74	95%	0.94
	Clear production gel coat	8.79	37.51%	7.47%	2.86	1.0	387.7	112.1	21.34	6.17	27.52	95%	3.03	95%	0.15
	Tooling gel coat	9.89	31.14%	4.50%	1.147	1.0	277.1	67.5	6.88	1.68	8.56	95%	1.60	95%	0.08
24/25-4GC	Production gel coat	11.26	28.00%	3.00%	11.470	1.0	151.3	45.0	42.79	12.73	55.52	95%	19.52	95%	0.98
								Worst-case:	**64.24**	**29.30**	**93.54**		**19.52**		**0.98**

Notes:
MMA is Methyl Methacrylate
Unified emission factors (UEF) are from "Unified Emission Factors for Open Molding of Composites," Composites Fabricators Association (October 13, 2009).
Available at: http://www.in.gov/idem/ctap/files/plastics_unified_emission_factors.pdf
Gel coats are applied using mechanical, atomized application
PM = PM_{10} = $PM_{2.5}$

Methodology:
PTE of styrene (ton/yr) = Density (lb/gal) * Maximum usage (gal material/unit) * Maximum throughput (unit/hr) * (UEF (lb styrene/ton resin or gel)) * 1 ton material/2000 lbs material * 8760 hr/yr * 1 ton/2000 lb
PTE of MMA (ton/yr) = Density (lb/gal) * Maximum usage (gal material/unit) * Maximum throughput (unit/hr) * (UEF (lb MMA/ton resin or gel)) * 1 ton material/2000 lbs material * 8760 hr/yr * 1 ton/2000 lb
PTE of VOC (ton/yr) = PTE of styrene (ton/yr) + PTE of MMA (ton/yr) (if applicable)
Uncontrolled PTE of PM (ton/yr) = Density (lb/gal) * (1 - (Weight % styrene + Weight % MMA)) * Maximum usage (gal material/unit) * Maximum throughput (unit/hr) * (1 - Transfer efficiency) * 8760 hr/yr * 1 ton/2000 lb
Controlled PTE of PM (ton/yr) = Uncontrolled PTE of PM (ton/yr) * (1-Control efficiency)
Interpolation of UEF factors for non-integer styrene contents (between 33% and 50%) or MMA content calculated as follows:
UEF = C - (((B-A) * (C-E)) / (B-D))
Where: A = Actual styrene/MMA content of resin of gelcoat
B = Closest styrene/MMA content expressed as an integer higher than actual styrene content
C = UEF for closest styrene/MMA content higher than actual
D = Closest styrene/MMA content expressed as an integer lower than actual styrene content
E = UEF for closest styrene/MMA content lower than actual

Catalyst

Emission Unit	Material	Density (lb/gal)	Weight % MEK	Weight % TPD	Maximum usage (gal/unit)	Maximum throughput (unit/hour)	% of monomer emitted	TPD emission factor (% TPD emitted)	PTE of MEK (tons/yr)	PTE of TPD (tons/yr)	PTE of VOC (tons/yr)
24/25-1GC	Cadox D-30	8.34	2.00%	83.0%	0.150	0.10	48.4%	0.04%	0.01	0.0002	0.01
24/25-2GC	Cadox D-30	8.34	2.00%	83.0%	0.150	1.00	55.6%	0.05%	0.11	0.0022	0.11
24/25-3GC	Cadox D-30	8.34	2.00%	83.0%	0.150	1.00	55.6%	0.05%	0.11	0.0022	0.11
24/25-4GC	Cadox D-30	8.34	2.00%	83.0%	0.150	1.00	31.70%	0.03%	0.11	0.0014	0.11

Notes:
The catalyst contains methyl ethyl ketone (MEK), methyl ethyl ketone peroxide (MEKP), and 2,2,4-Trimethyl-1,3-pentanediol diisobutanoate (TPD), all of which are non-HAP VOCs.
Catalyst contains no solids. Therefore there are no particulate emissions
MEKP in the catalyst is not emitted after being sprayed together with resin because it is immediately consumed by the gel coat to initiate the curing process.
TPD is a plasticizer performing the same function as dimethyl phthalate (DMP) and also has low vapor pressure (0.003880 mm/Hg at 25 degrees Celsius).
TPD emission factor is based on "Emission Factors for Liquid Organic Peroxide Catalysts used in the Open Molding of Composites",
Robert A. Haberlain, Ph.D., QEP - Engineering Environmental Consulting Services (March 24, 1999)

Methodology:
% monomer emitted (clear production gel coat as worst case) = (UEF (lb styrene/ton of gel coat) + UEF (lb MMA/ton of gel coat)) * 1 ton/2000 lbs / (Weight % styene + Weight % MMA)
TPD emission factor (% TPD emitted) = Vapor pressure of TPD (0.00388 mm Hg) / Vapor pressure of styrene (4.5 mm Hg) * % styrene emitted
PTE of MEK (tons/yr) = Density (lb/gal) * Maximum usage (gal material/unit) * Maximum throughput (unit/hr) * Weight % MEK * 8760 hr/yr * 1 ton/2000 lb

Appendix A: Emissions Calculations
Fiberglass grinding and cutting

Company Name: Smoker Craft, Inc.
Address City IN Zip: 68143 Clunette St. & 67977 Division St., New Paris, IN 46553
Significant Source Modification No: 039-43320-00073
Significant Permit Modification No: 039-43322-00073
Reviewer: Olajumoke Kayode

Emission Unit	Airflow (acfm)	Grain Loading per Actual Cubic Foot of Outlet Air	Air to Cloth Ratio Air Flow (acfm sq/ft)	Total Filter Area (sq ft)	Control Efficiency	Uncontrolled PTE (lb/hr)	Uncontrolled PTE (ton/yr)	Controlled PTE (lb/hr)	Controlled PTE (ton/yr)
24/25-1FG	7,500	2.41E-04	7.14	1050.00	99%	1.55	6.78	0.02	0.07
24/25-2FG	7,500	2.41E-04	7.14	1050.00	99%	1.55	6.78	0.02	0.07
Totals	**15,000**					**3.09**	**13.55**	**0.03**	**0.14**

Note:
$PM=PM_{10}=PM_{2.5}$

Methodology:
Uncontrolled Potential Emission(tons/yr) = [No. Units * Loading (grains/acf) * Air/Cloth Ratio (acfm/ft²) * Filter Area (ft²) * 1 lb/7,000 grains * 60 min/hr * 8760 hr/yr * 1 ton/2,000 lbs * 1/(1-Control Efficiency)]
Controlled Potential Emission (tons/yr) = [No. Units * Loading (grains/acf) * Air/Cloth Ratio (acfm/ft²) * Filter Area (ft²) * 1 lb/7,000 grains * 60 min/hr * 8760 hr/yr * 1 ton/2,000 lbs]

326 IAC 6-3-2 Limit

Emission Unit ID	Material throughput (lb/hr)	Process weight rate (ton/hr)	Allowable emissions (lb/hr)
24/25-1FG	2900	1.45	5.26
24/25-2FG	2900	1.45	5.26

Methodology:
Process weight rate (ton/hr) = Material throughput (lb/hr) / 2000 lb/ton
Allowable emission (lb/hr) = 4.10 * Process weight rate $(ton/hr)^{0.67}$, pursuant to 326 IAC 6-3-2(e)

Appendix A: Emissions Calculations
Boat Lining Operation (24/25-BL)

Company Name: Smoker Craft, Inc.
Address City IN Zip: 68143 Clunette St. & 67977 Division St., New Paris, IN 46553
Significant Source Modification No: 039-43320-00073
Significant Permit Modification No: 039-43322-00073
Reviewer: Olajumoke Kayode

Material	Density (lb/gal)	Weight % Volatile (Water & Organics)	Weight % Water	Weight % VOC	Volume % Water	Weight % Isocyanates	Usage rate (gal/unit)	Maximum throughput (unit/hr)	Maximum usage (gal/day)	VOC content (lb/gal coating)	VOC content (lb/gal coating less water)	PTE of VOC (lb/hr)	PTE of VOC (lb/day)	PTE of VOC (ton/yr)	PTE of Isocyanates (tons/yr)*	PTE of PM (tons/yr)	Transfer Efficiency
Gator Shield 93AR-30S, A-Side	9.80	0.00%	0.00%	0.00%	0.00%	69.00%	0.125	2.00	6.00	0.00	0.00	0.00	0.00	0.00	1.85	2.68	75%
Gator Shield 93AR-30S, B-Side	8.67	0.00%	0.00%	0.00%	0.00%	0.00%	0.125	2.00	6.00	0.00	0.00	0.00	0.00	0.00	0.00	2.37	75%
											Total PTE Before Control (ton/yr):	**0.00**	**0.00**	**0.00**	**1.85**	**5.06**	
											Control Efficiency:	**0.00%**	**0.00%**	**0.00%**	**0.00%**	**95.00%**	
											Total PTE After Control (ton/yr):	**0.00**	**0.00**	**0.00**	**1.85**	**0.25**	

Notes:
$PM=PM_{10}=PM_{2.5}$

Methodology:
Application method is air HVLP
Density (lb/gal) = Specific gravity * Density of water (8.34 lb/gal) or Provided in MSDS
Weight % VOC = Weight % Volatile (Water & Organics) - Weight % Water
Volume % Water = Weight % Water * Density (lb/gal) / Density of water (8.34 lb/gal)
Maximum usage (gal/day) = Usage rate (gal/unit) * Maximum throughput (unit/hr) * 24 hrs/day
VOC content (lb/gal coating) = Density (lb/gal) * Weight % VOC
VOC content (lb/gal coating less water) = Density (lb/gal) * Weight % VOC / (1-Volume % Water)
PTE of VOC (lb/hr) = VOC content (lb/gal coating) * Usage rate (gal/unit) * Maximum throughput (unit/hr)
PTE of VOC (lb/day) = PTE of VOC (lb/hr) * 24 hrs/day
PTE of VOC (ton/yr) = PTE of VOC (lb/hr) * 8760 hrs/yr * 1 ton/2000 lbs
PTE of PM Before Control (ton/yr) = Usage rate (gal/unit) * Maximum throughput (unit/hr) * Density (lb/gal)* (1-Weight % volatile) * (1-Transfer efficiency) * 8760 hrs/yr * 1 ton/2000 lbs
PTE of PM After Control (ton/yr) = Usage rate (gal/unit) * Maximum throughput (unit/hr) * Density (lb/gal)* (1-Weight % volatile) * (1-Transfer efficiency) * (1- Control Efficiency %) * 8760 hrs/yr * 1 ton/2000 lbs
PTE of HAP (ton/yr) = Usage rate (gal/unit) * Maximum throughput (unit/hr) * Density (lb/gal) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs (See below for isocyanate emissions)
*According to the manufacturer's SDS, the materials used in this process contain no volatile components; presume isocyanate emissions equal to the weight percent of isocyanate compounds multipled by the PM emissions

Appendix A: Emissions Calculations
Vacuum Operation

Company Name: Smoker Craft, Inc.
Address City IN Zip: 68143 Clunette St. & 67977 Division St., New Paris, IN 46553
Significant Source Modification No: 039-43320-00073
Significant Permit Modification No: 039-43322-00073
Reviewer: Olajumoke Kayode

Emission Unit	Airflow (acfm)	Grain Loading per Actual Cubic Foot of Outlet Air	Air to Cloth Ratio Air Flow (acfm/ft²)	Total Filter Area (ft²)	Control Efficiency	Uncontrolled PTE of PM (lb/hr)	Uncontrolled PTE of PM (tons/yr)	Controlled PTE of PM (lb/hr)	Controlled PTE of PM (tons/yr)
24/25-VAC	3000	0.00025	8.57	350.00	0.99	0.64	2.82	0.01	0.03

Note:
$PM=PM_{10}=PM_{2.5}$

Methodology:
Uncontrolled PTE = Grain loading rate (grains/acf) * Air flow rate (acfm) * 60 min/hr * 1 lb/7000 grains / (1 - Control efficiency)
Controlled PTE of PM (lb/hr) = Grain loading rate (grains/acf) * Air flow rate (acfm) * 60 min/hr * 1 lb/7000 grains
PTE of PM (ton/yr) = PTE of PM (lb/hr) * 8760 hrs/yr * 1 ton/2000 lbs

326 IAC 6-3-2 Limit

Emission Unit	Material throughput (lb/hr)	Process weight rate (ton/hr)	Allowable emissions (lb/hr)
24/25-VAC	5800	2.90	8.37

Methodology:
Process weight rate (ton/hr) = Material throughput (lb/hr) / 2000 lb/ton
Allowable emission (lb/hr) = 4.10 * Process weight rate $(ton/hr)^{0.67}$, pursuant to 326 IAC 6-3-2(e)

Appendix A: Emissions Calculations
Paint/ Gel Coat Touch up

Company Name: Smoker Craft, Inc.
Address City IN Zip: 68143 Clunette St. & 67977 Division St., New Paris, IN 46553
Significant Source Modification No: 039-43320-00073
Significant Permit Modification No: 039-43322-00073
Reviewer: Olajumoke Kayode

Emission unit ID	Material	Density (lb/gal)	Weight % Volatile (Water & Organics)	Weight % Water	Weight % VOC	Volume % Water	Usage rate (gal/unit)	Maximum throughput (unit/hr)	Maximum usage (gal/day)	VOC content (lb/gal coating)	VOC content (lb/gal coating less water)	PTE of VOC (lb/hr)	PTE of VOC (lb/day)	PTE of VOC (ton/yr)	PTE of PM (ton/yr)	Transfer Efficiency
24/25-1TU	3M Perfect It	10.01	55.97%	40.00%	15.97%	48.0%	0.0156	2.0	0.75	1.60	3.07	0.05	1.20	0.22	-	100%
	Acetone	6.61	100.00%	100%	0.00%	100.0%	0.0078	2.0	0.37	-	-	-	-	-	-	100%
24/25-2TU	3M Perfect It	10.01	55.97%	40.00%	15.97%	48.0%	0.0156	2.0	0.75	1.60	3.07	0.05	1.20	0.22	-	100%
	Acetone	6.61	100.00%	100%	0.00%	100.0%	0.0078	2.0	0.37	-	-	-	-	-	-	100%
24/25-3TU	Stone White 6202E	9.67	49.44%	0%	49.44%	0.0%	0.0156	2.0	0.75	4.78	4.78	0.15	3.58	0.65	0.23	65%
	Elpolydur Hardener	8.14	57.26%	0%	57.26%	0.0%	0.0078	2.0	0.37	4.66	4.66	0.07	1.75	0.32	0.08	65%

HAPs

Emission unit ID	Material	Density (lb/gal)	Usage rate (gal/unit)	Maximum throughput (unit/hr)	Xylene	
					% Weight	PTE (ton/yr)
24/25-1TU	3M Perfect It	10.01	0.0156	2.0	-	-
	Acetone	6.61	0.0078	2.0	-	-
24/25-2TU	3M Perfect It	10.01	0.0156	2.0	-	-
	Acetone	6.61	0.0078	2.0	-	-
24/25-3TU	Stone White 6202E	9.67	0.0156	2.0	25.84%	0.34
	Elpolydur Hardener	8.14	0.0078	2.0	33.19%	0.18

Notes:
$PM=PM_{10}=PM_{2.5}$

Methodology:
Weight % Volatile (Water & Organics) = Coating VOC (lb/gal) (as provided in MSDS) / Density (lb/gal)
Weight % VOC = Weight % Volatile (Water & Organics) - Weight % Water
Volume % Water = Weight % Water * Density (lb/gal) / Density of acetone (6.61 lb/gal)
Maximum usage (gal/day) = Usage rate (gal/unit) * Maximum throughput (unit/hr) * 24 hrs/day
VOC content (lb/gal coating) = Density (lb/gal) * Weight % VOC
VOC content (lb/gal coating less water) = Density (lb/gal) * Weight % VOC / (1-Volume % Water)
PTE of VOC (lb/hr) = VOC content (lb/gal coating) * Usage rate (gal/unit) * Maximum throughput (unit/hr)
PTE of VOC (lb/day) = PTE of VOC (lb/hr) * 24 hrs/day
PTE of VOC (ton/yr) = PTE of VOC (lb/hr) * 8760 hrs/yr * 1 ton/2000 lbs
PTE of PM (ton/yr) = Usage rate (gal/unit) * Maximum throughput (unit/hr) * Density (lb/gal)* (1-Weight % volatile) * (1-Transfer efficiency) * 8760 hrs/yr * 1 ton/2000 lbs
PTE of HAP (ton/yr) = Usage rate (gal/unit) * Maximum throughput (unit/hr) * Density (lb/gal) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

Appendix A: Emissions Calculations
Woodworking

Company Name: Smoker Craft, Inc.
Address City IN Zip: 68143 Clunette St. & 67977 Division St., New Paris, IN 46553
Significant Source Modification No: 039-43320-00073
Significant Permit Modification No: 039-43322-00073
Reviewer: Olajumoke Kayode

Emission Unit ID	Airflow (acfm)	Particulate outflow grain loading (gr/acf)	Control Efficiency	Uncontrolled PTE of PM (lb/hr)	Uncontrolled PTE of PM (ton/yr)	Controlled PTE of PM (lb/hr)	Controlled PTE of PM (ton/yr)
9-1W	6,284	0.002	98.0%	5.39	23.59	0.11	0.47
9-2W	950	0.003	99.0%	2.44	10.70	0.02	0.11
7-1W	950	0.003	99.0%	2.44	10.70	0.02	0.11
			Totals:	**10.27**	**44.99**	**0.16**	**0.69**

Note:
$PM=PM_{10}=PM_{2.5}$

Methodology:
Uncontrolled PTE = Grain loading rate (grains/acf) * Air flow rate (acfm) * 60 min/hr * 1 lb/7000 grains / (1 - Control efficiency)
Controlled PTE of PM (lb/hr) = Grain loading rate (grains/acf) * Air flow rate (acfm) * 60 min/hr * 1 lb/7000 grains
PTE of PM (ton/yr) = PTE of PM (lb/hr) * 8760 hrs/yr * 1 ton/2000 lbs

326 IAC 6-3-2 Limit

Emission Unit ID	Material throughput (lb/hr)	Process weight rate (ton/hr)	Allowable emissions (lb/hr)
1100	1100	0.55	2.75
200	200	0.10	0.88
200	200	0.10	0.88

Methodology:
Process weight rate (ton/hr) = Material throughput (lb/hr) / 2000 lb/ton
Allowable emission (lb/hr) = 4.10 * Process weight rate $(ton/hr)^{0.67}$, pursuant to 326 IAC 6-3-2(e)

Appendix A: Emissions Calculations
Welding and Thermal Cutting

Company Name: Smoker Craft, Inc.
Address City IN Zip: 68143 Clunette St. & 67977 Division St., New Paris, IN 46553
Significant Source Modification No: 039-43320-00073
Significant Permit Modification No: 039-43322-00073
Reviewer: Olajumoke Kayode

Process	Number of Stations	Maximum electrode consumption per station (lbs/hr)	Maximum electrode consumption per station (lbs/day)		Emission Factors* (lb pollutant/lb electrode)				Potential to Emit (lbs/hr)				HAPs (lbs/hr)
Welding					PM/PM10/PM2.5	Mn	Ni	Cr	PM/PM10/PM2.5	Mn	Ni	Cr	
Existing Metal Inert Gas (MIG)(carbon steel)	20	1.25	30		0.0055	0.0005			0.138	1.3E-02	0	0	1.3E-02
Existing Tungsten Inert Gas (TIG)(carbon ste	29	1.2	28.8		0.0055	0.0005			0.191	1.7E-02	0	0	1.7E-02
New Metal Inert Gas (MIG)(carbon steel)	26	1.25	30		0.0055	0.0005			0.179	1.6E-02	0	0	1.6E-02
New Tungsten Inert Gas (TIG)(carbon steel)	24	1.2	28.8		0.0055	0.0005			0.158	1.4E-02	0	0	1.4E-02
Totals													
Potential to Emit (lbs/hr)									0.67	6.1E-02	0.0E+00	0.0E+00	6.1E-02
Potential to Emit (lbs/day)									15.99	1.453	0.0E+00	0.000	1.453
Potential to Emit (tons/year)									2.92	2.7E-01	0.0E+00	0.0E+00	2.7E-01

Methodology:
*Emission Factors are default values for carbon steel unless a specific electrode type is noted in the Process column.
**Emission Factor for plasma cutting from American Welding Society (AWS). Trials reported for wet cutting of 8 mm thick mild steel with 3.5 m/min cutting speed (at 0.2 g/min emitted).
Therefore, the emission factor for plasma cutting is for 8 mm thick rather than 1 inch, and the maximum metal thickness is not used in calculting the emissions.
Using AWS average values: (0.25 g/min)/(3.6 m/min) x (0.0022 lb/g)/(39.37 in./m) x (1,000 in.) = 0.0039 lb/1,000 in. cut, 8 mm thick
Plasma cutting: Potential to Emit (lbs/hr) = (Number of stations) x (Maximum Metal Cutting Rate, inches/minute) x (60 minutes/hr) x (Emission Factor, lb pollutant/1,000 inches cut, 8 mm thick)
Cutting: Potential to Emit (lbs/hr) = (Number of stations) x (Maximum Metal Thickness, inches) x (Maximum Metal Cutting Rate, inches/minute) x (60 minutes/hour) x (Emission Factor, lb pollutant/1,000 inches cut, 1" thick)
Welding: Potential to Emit (lbs/hr) = (Number of stations) x (Maximum electode consumption per station, lbs/hr) x (Emission Factor, lb pollutant/lb of electrode used)
Potential to Emit (lbs/day) = Potential to Emit (lbs/hr) x (24 hours/day)
Potential to Emit (tons/year) = Potential to Emit (lbs/hr) x (8,760 hours/year) x (1 ton/2,000 lbs)

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

Company Name: Smoker Craft, Inc.
Address City IN Zip: 68143 Clunette St. & 67977 Division St., New Paris, IN 46553
Significant Source Modification No: 039-43320-00073
Significant Permit Modification No: 039-43322-00073
Reviewer: Olajumoke Kayode

Heat Input Capacity MMBtu/hr	HHV mmBtu/mmscf	Potential Throughput MMCF/yr
21.2	1020	182.1

	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	0.17	0.69	0.69	0.05	9.10	0.50	7.65

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
PM2.5 emission factor is filterable and condensable PM2.5 combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology
All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03
Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Hazardous Air Pollutants (HAPs)

	HAPs - Organics					
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	**Total - Organics**
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	
Potential Emission in tons/yr	1.9E-04	1.1E-04	6.8E-03	0.16	3.1E-04	**0.17**

	HAPs - Metals					
	Lead	Cadmium	Chromium	Manganese	Nickel	**Total - Metals**
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/yr	4.6E-05	1.0E-04	1.3E-04	3.5E-05	1.9E-04	**5.0E-04**
					Total HAPs	**0.17**
					Worst HAP	**0.16**

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

Appendix A: Emission Calculations
Reciprocating Internal Combustion Engines - Diesel Fuel
Output Rating (<=600 HP)
Maximum Input Rate (<=4.2 MMBtu/hr)

Company Name: Smoker Craft, Inc.
Address City IN Zip: 68143 Clunette St. & 67977 Division St., New Paris, IN 46553
Significant Source Modification No: 039-43320-00073
Significant Permit Modification No: 039-43322-00073
Reviewer: Olajumoke Kayode

Emissions calculated based on output rating (hp)

Output Horsepower Rating (hp)	155.0
Maximum Hours Operated per Year	500
Potential Throughput (hp-hr/yr)	77,500

	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
Emission Factor in lb/hp-hr	0.0022	0.0022	0.0022	0.00205	0.0310	0.0025	0.00668
Potential Emission in tons/yr	0.09	0.09	0.09	0.08	1.20	0.10	0.26

*PM and PM2.5 emission factors are assumed to be equivalent to PM10 emission factors. No information was given regarding which method was used to determine the factor or the fraction of PM10 which is condensable.

Hazardous Air Pollutants (HAPs)

	Pollutant							
	Benzene	Toluene	Xylene	1,3-Butadiene	Formaldehyde	Acetaldehyde	Acrolein	Total PAH HAPs***
Emission Factor in lb/hp-hr****	6.53E-06	2.86E-06	2.00E-06	2.74E-07	8.26E-06	5.37E-06	6.48E-07	1.18E-06
Potential Emission in tons/yr	2.53E-04	1.11E-04	7.73E-05	1.06E-05	3.20E-04	2.08E-04	2.51E-05	4.56E-05

***PAH = Polyaromatic Hydrocarbon (PAHs are considered HAPs, since they are considered Polycyclic Organic Matter)
****Emission factors in lb/hp-hr were calculated using emission factors in lb/MMBtu and a brake specific fuel consumption of 7,000 Btu / hp-hr (AP-42 Table 3.3-1).

Potential Emission of Total HAPs (tons/yr)	**1.05E-03**

Methodology
Emission Factors are from AP 42 (Supplement B 10/96) Tables 3.3-1 and 3.3-2.
Potential Throughput (hp-hr/yr) = [Output Horsepower Rating (hp)] * [Maximum Hours Operated per Year]
Potential Emission (tons/yr) = [Potential Throughput (hp-hr/yr)] * [Emission Factor (lb/hp-hr)] / [2,000 lb/ton]

Appendix A: Emission Calculations
Fugitive Dust Emissions - Paved Roads

Company Name: Smoker Craft, Inc.
Address City IN Zip: 68143 Clunette St. & 67977 Division St., New Paris, IN 46553
Significant Source Modification No: 039-43320-00073
Significant Permit Modification No: 039-43322-00073
Reviewer: Olajumoke Kayode

Paved Roads at Industrial Site
The following calculations determine the amount of emissions created by paved roads, based on 8,760 hours of use and AP-42, Ch 13.2.1 (1/2011).

Vehicle Informtation (provided by source)

Type	Maximum number of vehicles per day	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight of Loaded Vehicle (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Vehicle (entering plant) (one-way trip)	4.0	1.0	4.0	40.0	160.0	1500	0.284	1.1	414.8
Vehicle (leaving plant) (one-way trip)	4.0	1.0	4.0	40.0	160.0	1500	0.284	1.1	414.8
		Totals	**8.0**		**320.0**			**2.3**	**829.5**

Average Vehicle Weight Per Trip = 40.0 tons/trip
Average Miles Per Trip = 0.28 miles/trip

Unmitigated Emission Factor, Ef = [k * (sL)^0.91 * (W)^1.02] (Equation 1 from AP-42 13.2.1)

	PM	PM10	PM2.5	
where k =	0.011	0.0022	0.00054	lb/VMT = particle size multiplier (AP-42 Table 13.2.1-1)
W =	40.0	40.0	40.0	tons = average vehicle weight
sL =	9.7	9.7	9.7	g/m^2 = silt loading value for paved roads at iron and steel production facilities - Table 13.2.1-3)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, Eext = E * [1 - (p/4N)] (Equation 2 from AP-42 13.2.1)
Mitigated Emission Factor, Eext = Ef * [1 - (p/4N)]
where p = 125 days of rain greater than or equal to 0.01 inches (see Fig. 13.2.1-2)
N = 365 days per year

	PM	PM10	PM2.5	
Unmitigated Emission Factor, Ef =	3.745	0.749	0.1838	lb/mile
Mitigated Emission Factor, Eext =	3.424	0.685	0.1681	lb/mile

Process	Mitigated PTE of PM (Before Control) (tons/yr)	Mitigated PTE of PM10 (Before Control) (tons/yr)	Mitigated PTE of PM2.5 (Before Control) (tons/yr)
Vehicle (entering plant) (one-way trip)	0.71	0.14	0.03
Vehicle (leaving plant) (one-way trip)	0.71	0.14	0.03
Totals	**1.42**	**0.28**	**0.07**

Methodology

Total Weight driven per day (ton/day)	= [Maximum Weight of Loaded Vehicle (tons/trip)] * [Maximum trips per day (trip/day)]
Maximum one-way distance (mi/trip)	= [Maximum one-way distance (feet/trip) / [5280 ft/mile]
Maximum one-way miles (miles/day)	= [Maximum trips per year (trip/day)] * [Maximum one-way distance (mi/trip)]
Average Vehicle Weight Per Trip (ton/trip)	= SUM[Total Weight driven per day (ton/day)] / SUM[Maximum trips per day (trip/day)]
Average Miles Per Trip (miles/trip)	= SUM[Maximum one-way miles (miles/day)] / SUM[Maximum trips per year (trip/day)]
Unmitigated PTE (tons/yr)	= [Maximum one-way miles (miles/yr)] * [Unmitigated Emission Factor (lb/mile)] * (ton/2000 lbs)
Mitigated PTE (Before Control) (tons/yr)	= [Maximum one-way miles (miles/yr)] * [Mitigated Emission Factor (lb/mile)] * (ton/2000 lbs)
Mitigated PTE (After Control) (tons/yr)	= [Mitigated PTE (Before Control) (tons/yr)] * [1 - Dust Control Efficiency]

Abbreviations
PM = Particulate Matter
PM10 = Particulate Matter (<10 um)
PM2.5 = Particle Matter (<2.5 um)
PTE = Potential to Emit

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We Protect Hoosiers and Our Environment.
100 N. Senate Avenue • Indianapolis, IN 46204
(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

October 16, 2020

Todd Taylor
Smoker Craft, Inc.
68143 Clunette Street
New Paris, IN 46553

Re: Public Notice
Smoker Craft, Inc.
Permit Level: Title V-Significant Permit Modification & Title V-Significant Source Modification (Minor PSD/EO)
Permit Number: 039-43322-00073 & 039-43320-00073

Dear Mr. Todd Taylor:

Enclosed is the Notice of 30-Day Period for Public Comment for your draft air permit.

Our records indicate that you are the contact person for this application. However, if you are not the appropriate person within your company to receive this document, please forward it to the correct person. The Notice of 30-Day Period for Public Comment has also been sent to the OAQ Permits Branch Interested Parties List and, if applicable, your Consultant/Agent and/or Responsible Official/Authorized Individual.

The preliminary findings, including the draft permit, technical support document, emission calculations, and other supporting documents, **are available electronically at**:

IDEM's online searchable database: http://www.in.gov/apps/idem/caats/ . Choose Search Option **by Permit Number**, then enter permit 43322 & 43320

and

IDEM's Virtual File Cabinet (VFC): http://www.IN.gov/idem. Enter VFC in the search box, then search for permit documents using a variety of criteria, such as Program area, date range, permit #, Agency Interest Number, or Source ID.

The Public Notice period will begin the date the Notice is published on the IDEM Official Public Notice website. Publication has been requested and is expected within 2-3 business days. You may check the exact Public Notice begins and ends date here: https://www.in.gov/idem/5474.htm

Please note that as of April 17, 2019, IDEM is no longer required to publish the notice in a newspaper.

OAQ has submitted the draft permit package to the Goshen Public Library, 601 South 5th Street in Goshen, IN 46526. As a reminder, you are obligated by 326 IAC 2-1.1-6(c) to place a copy of the complete permit application at this library no later than ten (10) days after submittal of the application or additional information to our department. We highly recommend that even if you have already placed these materials at the library, that you confirm with the library that these materials are available for review and request that the library keep the materials available for review during the entire permitting process.

Please review the draft permit documents carefully. This is your opportunity to comment on the draft permit and notify the OAQ of any corrections that are needed before the final decision. Questions or comments about the enclosed documents should be directed to Olajumoke Kayode, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension 4-5373 or dial (317) 234-5373.

Sincerely,

Kathy Bourquein

Kathy Bourquein
Permits Branch
Office of Air Quality

Enclosures
PN Applicant Cover Letter access via website 8/10/2020

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Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

October 16, 2020

To: Goshen Public Library

From: Jenny Acker, Branch Chief
Permits Branch
Office of Air Quality

Subject: **Important Information to Display Regarding a Public Notice for an Air Permit**

Applicant Name: Smoker Craft, Inc.
Permit Number: 039-43322-00073 & 039-43320-00073

Enclosed is a copy of important information to make available to the public. This proposed project is regarding a source that may have the potential to significantly impact air quality. Librarians are encouraged to educate the public to make them aware of the availability of this information. The following information is enclosed for public reference at your library:

- Notice of a 30-day Period for Public Comment
- Draft Permit and Technical Support Document

You will not be responsible for collecting any comments from the citizens. Please refer all questions and request for the copies of any pertinent information to the person named below.

Members of your community could be very concerned in how these projects might affect them and their families. **Please make this information readily available until you receive a copy of the final package.**

If you have any questions concerning this public review process, please contact Joanne Smiddie-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185. Questions pertaining to the permit itself should be directed to the contact listed on the notice.

Enclosures
PN Library updated 4/2019

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Commissioner

Notice of Public Comment

October 16, 2020
Smoker Craft, Inc.
039-43322-00073 & 039-43320-00073

Dear Concerned Citizen(s):

You have been identified as someone who could potentially be affected by this proposed air permit. The Indiana Department of Environmental Management, in our ongoing efforts to better communicate with concerned citizens, invites your comment on the draft permit.

Enclosed is a Notice of Public Comment, which has posted on IDEM's Public Notice website at https://www.in.gov/idem/5474.htm.

The application and supporting documentation for this proposed permit have been placed at the library indicated in the Notice. These documents more fully describe the project, the applicable air pollution control requirements and how the applicant will comply with these requirements.

If you would like to comment on this draft permit, please contact the person named in the enclosed Public Notice. Thank you for your interest in the Indiana's Air Permitting Program.

Please Note: *If you feel you have received this Notice in error, or would like to be removed from the Air Permits mailing list, please contact Joanne Smiddie-Brush with the Air Permits Administration Section at 1-800-451-6027, ext. 3-0185 or via e-mail at JBRUSH@IDEM.IN.GOV. If you have recently moved and this Notice has been forwarded to you, please notify us of your new address and if you wish to remain on the mailing list. Mail that is returned to IDEM by the Post Office with a forwarding address in a different county will be removed from our list unless otherwise requested.*

Enclosure
PN AAA Cover Letter 2/28/2020

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Governor

Bruno L. Pigott
Commissioner

AFFECTED STATE NOTIFICATION OF PUBLIC COMMENT PERIOD
DRAFT INDIANA AIR PERMIT

October 16, 2020

A 30-day public comment period has been initiated for:

Permit Number: **039-43322-00073 & 039-43320-00073**
Applicant Name: **Smoker Craft, Inc.**
Location: **New Paris, Elkhart County, Indiana**

The public notice, draft permit and technical support documents can be accessed via the **IDEM Air Permits Online** site at:
http://www.in.gov/ai/appfiles/idem-caats/

Questions or comments on this draft permit should be directed to the person identified in the public notice by telephone or in writing to:

Indiana Department of Environmental Management
Office of Air Quality, Permits Branch
100 North Senate Avenue
Indianapolis, IN 46204

Questions or comments regarding this email notification or access to this information from the EPA Internet site can be directed to Chris Hammack at chammack@idem.IN.gov or (317) 233-2414.

Affected States Notification 1/9/2017

Mail Code 61-53

IDEM Staff	KBOURQUE October 16, 2020 Smoker Craft Incorporated 039-43322-00073 & 039-43320-00073 (draft)			AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender	▶	Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail: **CERTIFICATE OF MAILING ONLY**	

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee Remarks
1		Todd Taylor Smoker Craft Incorporated 68143 Clunette St New Paris IN 46553 (Source CAATS)									
2		Doug Smoker Smoker Craft Incorporated 68143 Clunette St New Paris IN 46553 *(RO CAATS)*									
3		Elkhart County Health Department 608 Oakland Avenue Elkhart IN 46516 *(Health Department)*									
4		Goshen Public Library 601 S 5th St Goshen IN 46526-3994 *(Library)*									
5		Elkhart County Board of Commissioners 117 North Second St. Goshen IN 46526 *(Local Official)*									
6		Jeri Seely The Mail-Journal PO Box 188 Milford IN 46542 *(Affected Party)*									
7		Mr. Roger Schneider The Goshen News 114 S. Main St Goshen IN 46526 *(Affected Party)*									
8											
9											
10											
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