NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

Preliminary Findings Regarding a Minor Modification to a Part 70 Operating Permit for Barletta Boat Company in Elkhart County

Minor Permit Modification No.: 039-43547-00807

The Indiana Department of Environmental Management (IDEM) has received an application from Barletta Boat Company, located at 51687 County Road 133, Bristol, Indiana 46507, for a minor modification of its Part 70 Operating Permit issued on September 18, 2018. If approved by IDEM’s Office of Air Quality (OAQ), this proposed modification would allow Barletta Boat Company to make certain changes at its existing source. Barletta Boat Company has applied to construct a new building, identified as Plant 2, consisting of similar equipment as what is currently permitted at the existing source.

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:

Bristol Washington Township Public Library
505 W Vistula St
Bristol, IN 46507

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 MPM 039-43547-00807 in all correspondence.

Comments should be sent to:

Alexandrea Neuzerling
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for Alexandrea Neuzerling or (317) 232-6634
Or dial directly: (317) 232-6634
Fax: (317) 232-6749 attn: Alexandrea Neuzerling
E-mail: ANeuzerl@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 Alexandrea Neuzerling of my staff at the above address.

Iryn Calilung, Section Chief
Permits Branch
Office of Air Quality
Gene Chastain
Barletta Boat Company
51687 County Road 133
Bristol, IN 46507

Re: 039-43547-00807
Minor Permit Modification

Dear Gene Chastain:

Barletta Boat Company was issued Part 70 Operating Permit No. T039-40049-00807 on September 18, 2018 for a stationary pontoon boat manufacturing facility located at 51687 County Road 133, Bristol, Indiana 46507. An application requesting changes to this permit was received on December 4, 2020. Pursuant to the provisions of 326 IAC 2-7-12, a Minor Permit Modification to this permit is hereby approved as described in the attached Technical Support Document.

Please find attached the entire Part 70 Operating Permit as modified. The permit references the below listed attachment(s). Since these attachments have been provided in previously issued approvals for this source, IDEM OAQ has not included a copy of these attachments with this modification:

Attachment A: 40 CFR 63, Subpart PPPP, NESHAP for Surface Coating of Plastic Parts and Products
Attachment B: 40 CFR 63, Subpart VVVV, NESHAP for Boat Manufacturing

Previously issued approvals for this source containing these attachments are available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/.

Previously issued approvals for this source are 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.


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: https://www.in.gov/idem/airpermit/2400.htm; and the Citizens’ Guide to IDEM on the Internet at: https://www.in.gov/idem/6900.htm.

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

If you have any questions regarding this matter, please contact Alexandrea Neuzerling, 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) 232-6634 or (800) 451-6027, and ask for Alexandrea Neuzerling or (317) 232-6634.

Sincerely,

Iryn Calilung, Section Chief
Permits Branch
Office of Air Quality

Attachments: Modified Permit 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
Part 70 Operating Permit
OFFICE OF AIR QUALITY

Barletta Boat Company
51687 County Road 133
Bristol, Indiana 46507

(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.

The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

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.

<table>
<thead>
<tr>
<th>Operation Permit No.: T039-40049-00807</th>
</tr>
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<tbody>
<tr>
<td>Master Agency Interest ID.: 34820</td>
</tr>
</tbody>
</table>

| Issued by: Original signed by:        |
| Heath Hartley, Section Chief          |
| Permits Branch, Office of Air Quality |

| Issuance Date: September 18, 2018    |
| Expiration Date: September 18, 2023  |


| Minor Permit Modification No.: 039-43547-008007 |

| Issued by:                                    |
| Iryn Calilung, Section Chief                  |
| Permits Branch                                |
| Office of Air Quality                         |

| Issuance Date:                                |
| Expiration Date: September 18, 2023          |
TABLE OF CONTENTS

SECTION A  SOURCE SUMMARY .......................................................................................................................... 5
  A.1 General Information [326 IAC 2-7-4(c)][326 IAC 2-7-5(14)][326 IAC 2-7-1(22)]
  A.2 Emission Units and Pollution Control Equipment Summary
      [326 IAC 2-7-4(c)(3)][326 IAC 2-7-5(14)]
  A.3 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-7-4(c)][326 IAC 2-7-5(14)]
  A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

SECTION B  GENERAL CONDITIONS ................................................................................................................. 9
  B.1 Definitions [326 IAC 2-7-1]
  B.2 Revocation of Permits [326 IAC 2-1.1-9(5)]
  B.3 Affidavit of Construction [326 IAC 2-5.1-3(h)] [326 IAC 2-5.1-4]
  B.4 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)]
  B.5 Term of Conditions [326 IAC 2-1.1-9.5]
  B.6 Enforceability [326 IAC 2-7-7] [IC 13-17-12]
  B.7 Severability [326 IAC 2-7-5(5)]
  B.8 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]
  B.9 Duty to Provide Information [326 IAC 2-7-5(6)(E)]
  B.10 Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]
  B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]
  B.12 Preventive Maintenance Plan [326 IAC 2-7-12(1)][326 IAC 1-6-3]
  B.13 Emergency Provisions [326 IAC 2-7-16]
  B.14 Permit Shield [326 IAC 2-7-15][326 IAC 2-7-20][326 IAC 2-7-12]
  B.15 Prior Permits Superseded [326 IAC 2-1.1-9.5][326 IAC 2-7-10.5]
  B.16 Termination of Right to Operate [326 IAC 2-7-10][326 IAC 2-7-4(a)]
  B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination
      [326 IAC 2-7-5(6)(C)][326 IAC 2-7-8(a)][326 IAC 2-7-9]
  B.18 Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)]
  B.19 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12]
  B.20 Permit Revision Under Economic Incentives and Other Programs
      [326 IAC 2-7-5(8)][326 IAC 2-7-12(b)(2)]
  B.21 Operational Flexibility [326 IAC 2-7-20][326 IAC 2-7-10.5]
  B.22 Source Modification Requirement [326 IAC 2-7-10.5]
  B.23 Inspection and Entry [326 IAC 2-7-6][IC 13-14-2-2][IC 13-30-3-1][IC 13-17-3-2]
  B.24 Transfer of Ownership or Operational Control [326 IAC 2-7-11]
  B.25 Annual Fee Payment [326 IAC 2-7-19][326 IAC 2-7-5(7)][326 IAC 2-1.1-7]
  B.26 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314] [326 IAC 1-1-6]

SECTION C  SOURCE OPERATION CONDITIONS ................................................................................................. 20
  Emission Limitations and Standards [326 IAC 2-7-5(1)] ............................................................................ 20
    C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less
        Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]
    C.2 Opacity [326 IAC 5-1]
    C.3 Open Burning [326 IAC 4-1][IC 13-17-9]
    C.4 Incineration [326 IAC 4-2][326 IAC 9-1-2]
    C.5 Fugitive Dust Emissions [326 IAC 6-4]
    C.6 Asbestos Abatement Projects [326 IAC 14-10][326 IAC 18][40 CFR 61, Subpart M]
  Testing Requirements [326 IAC 2-7-6(1)] .......................................................................................... 22
    C.7 Performance Testing [326 IAC 3-6]
  Compliance Requirements [326 IAC 2-1.1-11] ..................................................................................... 22
    C.8 Compliance Requirements [326 IAC 2-1.1-11]
Compliance Monitoring Requirements \[326 \text{ IAC 2-7-5(1)[326 IAC 2-7-6(1)]}\] ......................... 22
C.9 Compliance Monitoring \[326 \text{ IAC 2-7-5(3)[326 IAC 2-7-6(1)]}\]
C.10 Instrument Specifications \[326 \text{ IAC 2-1.1-11[326 IAC 2-7-5(3)[326 IAC 2-7-6(1)]}\]

Corrective Actions and Response Steps \[326 \text{ IAC 2-7-5][326 IAC 2-7-6}\] ......................... 23
C.11 Emergency Reduction Plans \[326 \text{ IAC 1-5-2[326 IAC 1-5-3]}\]
C.12 Risk Management Plan \[326 \text{ IAC 2-7-5(11)[40 CFR 68]}\]
C.13 Response to Excursions or Exceedances \[326 \text{ IAC 2-7-5[326 IAC 2-7-6]}\]
C.14 Actions Related to Noncompliance Demonstrated by a Stack Test \[326 \text{ IAC 2-7-5[326 IAC 2-7-6]}\]

Record Keeping and Reporting Requirements \[326 \text{ IAC 2-7-5(3)[326 IAC 2-7-19]}\] ......................... 25
C.15 Emission Statement \[326 \text{ IAC 2-7-5(3)(C)(iii)[326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]}\]
C.16 General Record Keeping Requirements \[326 \text{ IAC 2-7-5(3)[326 IAC 2-7-6]}\]
C.17 General Reporting Requirements \[326 \text{ IAC 2-7-5(3)(C)[326 IAC 2-1.1-11]}\]

Stratospheric Ozone Protection ................................................................................................. 26
C.18 Compliance with \[40 \text{ CFR 82 and 326 IAC 22-1}\]

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS .............................................................. 27

Emission Limitations and Standards \[326 \text{ IAC 2-7-5(1)}\] ......................................................... 27
D.1.1 Particulate Emission Limitations \[326 \text{ IAC 6-3-2}\]
D.1.2 Preventive Maintenance Plan \[326 \text{ IAC 2-7-5(1)}\]

Compliance Determination Requirements \[326 \text{ IAC 2-7-5(1)}\] ......................................................... 27
D.1.3 Particulate Control

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS .............................................................. 28

Emission Limitations and Standards \[326 \text{ IAC 2-7-5(1)}\] ......................................................... 29
D.2.1 Volatile Organic Compounds (VOC) \[326 \text{ IAC 8-1-6}\]
D.2.2 Particulate Emission Limitations \[326 \text{ IAC 6-3-2(d)}\]
D.2.3 Emission Standards for HAPs for Boat Manufacturing \[326 \text{ IAC 20-48}\]
D.2.4 Preventive Maintenance Plan \[326 \text{ IAC 2-7-5(1)}\]

Compliance Determination Requirements \[326 \text{ IAC 2-7-5(1)}\] ......................................................... 30
D.2.5 Volatile Organic Compounds (VOC)

Compliance Monitoring Requirements \[326 \text{ IAC 2-7-5(1)[326 IAC 2-7-6(1)]}\] ......................... 30
D.2.6 Monitoring

Record Keeping and Reporting Requirements \[326 \text{ IAC 2-7-5(3)[326 IAC 2-7-19]}\] ......................... 31
D.2.7 Record Keeping Requirement
D.2.8 Reporting Requirements

SECTION E.1 NESHAP ........................................................................................................................... 32

National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements \[326 \text{ IAC 2-7-5(1)}\] ......................................................... 32
E.1.2 National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products NESHAP \[40 \text{ CFR Part 63, Subpart PPPP[326 IAC 20-81]}\]

Emission Limitations and Standards \[326 \text{ IAC 2-7-5(1)}\] ......................................................... 33
E.1.3 Preventive Maintenance Plan \[326 \text{ IAC 2-7-5(12)}\]
SECTION E.2 NESHAP ........................................................................................................................... 34

National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements
[326 IAC 2-7-5(1)] ........................................................................................................................... 35


E.2.2 National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing NESHAP [40 CFR Part 63, Subpart VVV] [326 IAC 20-48]

Emission Limitations and Standards [326 IAC 2-7-5(1)] ........................................................................................................................... 36

E.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

CERTIFICATION ........................................................................................................................................ 37

EMERGENCY OCCURRENCE REPORT .................................................................................................. 38

Part 70 Quarterly Report ........................................................................................................................... 40

QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT ............................................... 41


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 pontoon boat manufacturing facility.

<table>
<thead>
<tr>
<th>Source Address:</th>
<th>51687 County Road 133, Bristol, Indiana 46507</th>
</tr>
</thead>
<tbody>
<tr>
<td>General Source Phone Number:</td>
<td>(574) 825-8900</td>
</tr>
<tr>
<td>SIC Code:</td>
<td>3732 (Boat Building and Repairing)</td>
</tr>
<tr>
<td>County Location:</td>
<td>Elkhart</td>
</tr>
<tr>
<td>Source Location Status:</td>
<td>Attainment for all criteria pollutants</td>
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<tr>
<td>Source Status:</td>
<td>Part 70 Operating Permit Program</td>
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</tbody>
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A.2  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:

**Plant 1**

(a) One (1) aluminum boat assembly operation, constructed in 2018, and approved in 2019 for modification, each using roll, flow, or brush application, using no controls, exhausting indoors, and consisting of the following:

(1) Two (2) surface coating assembly lines, identified as Line 1 and Line 2, with a maximum capacity of 0.40 gallons per unit and 3.5 units per hour;

(2) Two (2) metal jacket stations, with a maximum capacity of 0.25 gallons per unit and 3.5 units per hour;

Under 40 CFR 63, Subpart VVVV, the metal jacket stations are considered new affected facilities.

(3) Two (2) final finish 2 stations, with a maximum capacity of 0.03 gallons per unit and 3.5 units per hour.

(4) Two (2) carpet (vinyl) adhesive stations, with a maximum capacity of 2.5 gallons per unit and 3.5 units per hour;

Under 40 CFR 63, Subpart VVVV, the carpet adhesive stations are considered new affected facilities.

(c) One (1) Gel Application Station, identified as GC1, approved in 2018 for construction, with a maximum capacity of 3.50 parts per hour, using airless, air assisted containment (ACC) gun, using a dry particulate filter as control, and exhausting to stack GC1S.
Under 40 CFR 63, Subpart VVVV, the gel application booth is considered a new affected facility.

(d) One (1) Resin Application Station, identified as CG1, approved in 2018 for construction, with a maximum capacity of 3.50 parts per hour, using roll, flow, brush application, and/or FIT application (non-atomized mechanical applicator), using a dry particulate filter as control, and exhausting to stack CG1S.

Under 40 CFR 63, Subpart VVVV, the resin application booth is considered a new affected facility.

(e) One (1) Resin Hand Layup Area, identified as HL1, approved in 2018 for construction, with a maximum capacity of 3.50 parts per hour, using roll, flow, or brush application, using no controls, and exhausting indoors.

Under 40 CFR 63, Subpart VVVV, the resin hand layup area is considered a new affected facility.

(f) One (1) Fiberglass Grinding Room, identified as GR1, approved in 2018 for construction, with a maximum capacity of 0.75 ton per hour, using a cartridge filter as particulate control, and exhausting indoors.

(g) One (1) Paint Booth 2, identified as PB2, approved in 2018 for construction, with a maximum capacity of 3.50 parts per hour, using HVLP application, applying coatings to the exterior of marine vessels, using a dry filter for particulate control, and exhausting to stack PB2S.

Under 40 CFR 63, Subpart PPPP, the paint booth 2 is considered a new affected facility, when applying coatings to plastic parts.

Under 40 CFR 63, Subpart VVVV, the paint booth 2 is considered a new affected facility, when applying gel coats or resin to fiberglass components of the aluminum boats.

Plant 2

(h) One (1) aluminum boat assembly operation, approved in 2021 for construction, each using roll, flow, or brush application, uncontrolled, exhausting indoors, and consisting of the following:

(1) One (1) surface coating assembly line, identified as Line 3, with a maximum capacity of 0.4 gallons per unit and 1.75 units per hour;

(2) One (1) metal jacket station, with a maximum capacity of 0.25 gallons per unit and 1.75 units per hour;

Under 40 CFR 63, Subpart VVVV, the metal jacket station is considered a new affected facility.

(3) One (1) final finish station, with a maximum capacity of 0.03 gallons per unit and 1.75 units per hour;

(4) One (1) carpet (vinyl) adhesive station, with a maximum capacity of 2.5 gallons per unit and 1.75 units per hour;

Under 40 CFR 63, Subpart VVVV, the carpet adhesive station is considered a new affected facility.
A.3 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-7-4(c)][326 IAC 2-7-5(14)]

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

**Plant 1**

(a) One (1) touch-up paint booth, identified as PB1, approved in 2018 for construction, consisting of two (2) HVLP spray guns, applying coatings to the exterior of marine vessels, with a combined maximum capacity of 1.0 unit per hour, using dry filters as particulate control, and exhausting to stack PBSV1.

Under 40 CFR 63, Subpart PPPP, the touch-up paint booth is considered a new affected facility, when applying coatings to plastic parts.

Under 40 CFR 63, Subpart VVVV, the touch-up paint booth is considered a new affected facility, when applying gel coats to fiberglass components of the aluminum boats.

(b) One (1) woodworking operation, identified as INDC, approved in 2018 for construction, with a maximum capacity of 200 lbs/hour, using an internal dust collector as particulate control, and exhausting indoors.

(c) Six (6) aluminum cutting chop saws, identified as CS1 through CS6, approved in 2018 for construction, each with a maximum capacity of 50 lbs/hour, each using no controls, and each exhausting indoors.

(d) Seventy-five (75) MIG/TIG welding stations, identified as Weld, approved in 2018 for construction, each with a maximum capacity of 1.0 lb wire/hour, each using no controls, and each exhausting indoors.

(e) Eight (8) natural gas heaters, identified as H1 through H8, approved in 2018 for construction, each with a heat input capacity of 0.125 MMBtu/hr, each using no controls, and each exhausting outdoors.

(f) Twenty-three (23) natural gas heaters, identified as H9 through H31, approved in 2018 for construction, each with a heat input capacity of 0.10 MMBtu/hr, each using no controls, and each exhausting outdoors.

(g) One (1) Assembly Operation, identified as AO1, approved in 2018 for construction, with a maximum capacity of 3.50 parts per hour, using roll, flow, or brush application, applying coatings to the exterior of marine vessels, using no controls, and exhausting indoors.

Under 40 CFR 63, Subpart PPPP, the assembly operation is considered a new affected facility.

(h) One (1) Mold Preparation & Cleanup Operation, identified as MP1, approved in 2018 for construction, with a maximum capacity of 0.03 parts per hour, using roll, flow, or brush application, applying coatings to fiberglass, using no controls, and exhausting indoors.

Under 40 CFR 63, Subpart VVVV, the mold preparation and cleanup operation is considered a new affected facility.

(i) One (1) Final Finish Operation, identified as FF1, approved in 2018 for construction, with a maximum capacity of 3.50 parts per hour, using roll, flow, or brush application, applying coatings to the exterior of marine vessels, using no controls, and exhausting indoors.
(j) Paved and Unpaved Roads

(k) One (1) diesel storage tank, identified as ASTD, approved in 2018 for construction, with a maximum capacity of 550 gallons, using no controls, and exhausting outdoors.

(l) One (1) petroleum storage tank, identified as ASTG, approved in 2018 for construction, with a maximum capacity of 550 gallons, using no controls, and exhausting outdoors.

Plant 2

(m) Seventy-five (75) aluminum welders, identified as Weld3, approved in 2021 for construction, each with a maximum capacity of 1.0 lb wire/hour, each using no controls, and each exhausting indoors.

(n) Two (2) aluminum cutting stations, identified as ALCut3, approved in 2021 for construction, each with a maximum capacity of 85 lbs/hour, exhausting indoors, and consisting of the following:

(1) One (1) bit cutter, identified as BC1, controlled by an internal dust collection system for particulate control, identified as INBH1.

(2) One (1) double upcut saw, identified as UCS1, controlled by an internal dust collection system for particulate control, identified as INBH2.

(o) Four (4) natural gas-fired thermocycler heaters, identified as TCH1-TCH4, approved in 2021 for construction, each with a heat input capacity of 0.72 MMBtu/hr, each using no control, and each exhausting outdoors.

(p) One (1) natural gas-fired heater, identified as OH1, approved in 2021 for construction, each with a heat input capacity of 1.1 MMBtu/hr, using no control, and exhausting outdoors.

(q) Paved Roads

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

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

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).
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 Revocation of Permits [326 IAC 2-1.1-9(5)]
Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

B.3 Affidavit of Construction [326 IAC 2-5.1-3(h)] [326 IAC 2-5.1-4]
This document shall also become the approval to operate pursuant to 326 IAC 2-5.1-4 when prior to the start of operation, the following requirements are met:

(a) The attached Affidavit of Construction shall be submitted to the Office of Air Quality (OAQ), verifying that the emission units were constructed as proposed in the application or the permit. The emission units covered in this permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM if constructed as proposed.

(b) If actual construction of the emission units differs from the construction proposed in the application, the source may not begin operation until the permit has been revised pursuant to 326 IAC 2 and an Operation Permit Validation Letter is issued.

(c) The Permittee shall attach the Operation Permit Validation Letter received from the Office of Air Quality (OAQ) to this permit.

B.4 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, T039-40049-00807, 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.

(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.5 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.6 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.7 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.8 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.9 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.

B.10 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.11 Annual Compliance Certification [326 IAC 2-7-6(5)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted 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

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

(a) If required by specific condition(s) in Section D of this permit, 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.

(b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or 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).

(c) 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.13 Emergency Provisions [326 IAC 2-7-16]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.

(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;

(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.14 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 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.15 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 T039-40049-00807 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.
B.16 Termination of Right to Operate [326 IAC 2-7-10][326 IAC 2-7-4(a)]

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

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

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 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.18 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 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.19 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12]

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

(b) 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).

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

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

(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.21 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;
(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).
(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.

B.22 Source Modification Requirement [326 IAC 2-7-10.5]
A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2.

B.23 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.24 Transfer of Ownership or Operational Control [326 IAC 2-7-11]
(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:
Indiana Department of Environmental Management
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.25 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.26 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.
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 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(c).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(d).

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.
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
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 prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) These ERPs shall be submitted for approval to:

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

no later than 180 days from the date on which this source commences operation.

The ERP 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) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

(d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

(e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

(f) Upon direct notification by IDEM, 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

(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:

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
allow 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
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) The first report shall cover the period commencing on the date of issuance of this permit or the date of initial start-up, whichever is later, and ending on the last day of the reporting period. 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.
SECTION D.1  EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Plant 1

(e) One (1) Fiberglass Grinding Room, identified as GR1, approved in 2018 for construction, with a maximum capacity of 0.75 ton per hour, using a cartridge filter as particulate control, and exhausting indoors.

Insignificant Activity:
(b) One (1) woodworking operation, identified as INDC, approved in 2018 for construction, with a maximum capacity of 200 lbs/hour, using an internal dust collector as particulate control, and exhausting indoors.

(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 Particulate Emission Limitations [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from the fiberglass grinding room (GR1) shall not exceed 3.38 pounds per hour when operating at a process weight rate of 0.75 tons per hour.

The pounds per hour limitation was calculated with the following equation:

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

\[
E = 4.10 P^{0.67}
\]

Where \( E \) = rate of emission in pounds per hour; and
\( P \) = process weight rate in tons per hour

D.1.2 Preventive Maintenance Plan [326 IAC 2-7-5(1)]

A Preventive Maintenance Plan is required for this facility and its control device. 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.1.3 Particulate Control

In order to assure the woodworking operation is not subject to the requirements of 326 IAC 6-3-2, the integral internal dust collector for particulate control shall be in operation and control emissions from the woodworking operation at all times the woodworking operation is in operation.

Compliance with this condition, combined with the potential to emit particulate from all other emission units at the source, shall assure the particulate emissions from the entire source are less than 25 tons per twelve (12) consecutive month period.
Emissions Unit Description:

Plant 1

(b) One (1) Gel Application Station, identified as GC1, approved in 2018 for construction, with a maximum capacity of 3.50 parts per hour, using airless, air assisted containment (ACC) gun, using a dry particulate filter as control, and exhausting to stack GC1S.

Under 40 CFR 63, Subpart VVVV, the gel application booth is considered a new affected facility.

(e) One (1) Resin Application Station, identified as CG1, approved in 2018 for construction, with a maximum capacity of 3.50 parts per hour, using roll, flow, brush application, and/or FIT application (non-atomized mechanical applicator), using a dry particulate filter as control, and exhausting to stack CG1S.

Under 40 CFR 63, Subpart VVVV, the resin application booth is considered a new affected facility.

(d) One (1) Resin Hand Layup Area, identified as HL1, approved in 2018 for construction, with a maximum capacity of 3.50 parts per hour, using roll, flow, or brush application, using no controls, and exhausting indoors.

Under 40 CFR 63, Subpart VVVV, the resin hand layup area is considered a new affected facility.

(f) One (1) Paint Booth 2, identified as PB2, approved in 2018 for construction, with a maximum capacity of 3.50 parts per hour, using HVLP application, applying coatings to the exterior of marine vessels, using a dry filter for particulate control, and exhausting to stack PB2S.

Under 40 CFR 63, Subpart PPPP, the paint booth 2 is considered a new affected facility, when applying coatings to plastic parts. Under 40 CFR 63, Subpart VVVV, the paint booth 2 is considered a new affected facility, when applying gel coats to fiberglass components of the aluminum boats.

Insignificant Activities:

(a) One (1) touch-up paint booth, identified as PB1, approved in 2018 for construction, consisting of two (2) HVLP spray guns, applying coatings to the exterior of marine vessels, with a combined maximum capacity of 1.0 unit per hour, using dry filters as particulate control, and exhausting to stack PBSV1.

Under 40 CFR 63, Subpart PPPP, the touch-up paint booth is considered a new affected facility, when applying coatings to plastic parts. Under 40 CFR 63, Subpart VVVV, the touch-up paint booth is considered a new affected facility, when applying gel coats to fiberglass components of the aluminum boats.

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

In order to render the requirements of 326 IAC 8-1-6 (New Facilities; General Reduction Requirements) not applicable, the Permittee shall comply with the following:

The VOC input, including coatings, dilution, and cleaning solvents to the paint booth 2 (PB2) shall not exceed 24.9 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with these limits shall limit the potential to emit VOC from the paint booth 2 (PB2) to less than twenty-five (25) tons per 12 consecutive month period, and shall render the requirements of 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities) not applicable.

D.2.2 Particulate Emission Limitations [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from the Gel Application Booth (GC1) and Paint Booth 2 (PB2) shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer’s specifications.

D.2.3 Emission Standards for HAPs for Boat Manufacturing [326 IAC 20-48]

(a) Pursuant to 326 IAC 20-48-2, gel application booth (GC1) and the paint booths PB1 and PB2 are subject to the following weighted-average percent organic HAP content, when applying gel coating:

<table>
<thead>
<tr>
<th>For this Operation</th>
<th>And this application method</th>
<th>Weighted-average percent organic HAP content requirement</th>
</tr>
</thead>
<tbody>
<tr>
<td>Pigmented gel coat operations</td>
<td>Atomized (spray)</td>
<td>33%</td>
</tr>
<tr>
<td>Clear gel coat operations</td>
<td>Atomized (spray)</td>
<td>48%</td>
</tr>
<tr>
<td>Tooling gel coat operations</td>
<td>Atomized (spray)</td>
<td>40%</td>
</tr>
<tr>
<td>Pigmented gel coat operations</td>
<td>Nonatomized (nonspray)</td>
<td>40%</td>
</tr>
<tr>
<td>Clear gel coat operations</td>
<td>Nonatomized (nonspray)</td>
<td>55%</td>
</tr>
<tr>
<td>Tooling gel coat operations</td>
<td>Nonatomized (nonspray)</td>
<td>54%</td>
</tr>
</tbody>
</table>

(b) Pursuant to 326 IAC 20-48-3, the gel application booth (GC1), the resin hand layup area (HL1), resin application booth (CG1), touch-up paint booth (PB1), and paint booth 2 (PB2) when applying resin or gel coating are subject to the following work practice standards:

1. Nonatomizing spray equipment shall not be operated at pressures that atomize the material during the application process.
2. Solvents sprayed during cleanup and resin changes shall be directed into solvent collection containers.
3. 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.
4. Clean-up rags with solvent shall be stored in closed containers.
5. Closed containers shall be used for the storage of the following:
   (A) All production and tooling resins that contain HAPs.
   (B) All production and tooling gel coats that contain HAPs.
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.

Pursuant to 326 IAC 20-48-4, the gel application booth (GC1), resin application booth (CG1), touch-up paint booth (PB1), and paint booth (PB2) when applying resin or gel coat is subject to the following operator training requirements:

1. Each owner or operator shall 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 subsection (b) 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 subdivision (1) if written documentation that the employee's training is current is provided to the new employer.

2. 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.

3. The owner or operator shall 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.

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

D.2.4 Preventive Maintenance Plan [326 IAC 2-7-5(1)]

A Preventive Maintenance Plan is required for these facilities and any 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.2.5 Volatile Organic Compounds (VOC)

Compliance with the VOC limitations contained in Condition D.2.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

D.2.6 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters in Gel Coat Application Station (GC1) stack (GCS1) and Paint Booth 2 (PB2) stack PB2S). To monitor the performance of the dry filters, weekly observations shall be
made of the overspray from the Gel Coat Application Booth (GC1) stack (GCS1) and Paint Booth 2 (PB2) stack (PB2S) while the booths are in operation. If a condition exists which should result in a response, the Permittee shall take a 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.

(b) Monthly inspections shall be performed of the coating emissions from stacks GCS1 and PB2S and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take a 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.

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.2.1, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC content limits established in Condition D.2.1. Records necessary to demonstrate compliance shall be available no later than 30 days of the end of each compliance period.

1. The VOC content of each coating and solvent used.
2. The amount of coating and solvent used on a monthly basis.
3. The total VOC usage for each month;
4. The weight of VOC emitted for each compliance period;

(b) To document the compliance status with Conditions D.2.2 and D.2.6 the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections.

(c) Section C - General Record Keeping Requirements contains the Permittee’s obligations with regard to the record keeping required by the condition.

D.2.8 Reporting Requirements

A quarterly summary of the information to document the compliance status with Condition D.2.1 shall be submitted not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting 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).
SECTION E.1  NESHAP

Emissions Unit Description:

Plant 1

(f) One (1) Paint Booth 2, identified as PB2, approved in 2018 for construction, with a maximum capacity of 3.50 parts per hour, using HVLP application, applying coatings to the exterior of marine vessels, using a dry filter for particulate control, and exhausting to stack PB2S.

Under 40 CFR 63, Subpart PPPP, the paint booth 2 is considered a new affected facility, when applying coatings to plastic parts.

Under 40 CFR 63, Subpart VVVV, the paint booth 2 is considered a new affected facility, when applying gel coats to fiberglass components of the aluminum boats.

Insignificant Activities:

Plant 1

(a) One (1) touch-up paint booth, identified as PB1, approved in 2018 for construction, consisting of two (2) HVLP spray guns, applying coatings to the exterior of marine vessels, with a combined maximum capacity of 1.0 unit per hour, using dry filters as particulate control, and exhausting to stack PBSV1.

Under 40 CFR 63, Subpart PPPP, the touch-up paint booth is considered a new affected facility, when applying coatings to plastic parts.

Under 40 CFR 63, Subpart VVVV, the touch-up paint booth is considered a new affected facility, when applying gel coats to fiberglass components of the aluminum boats.

(g) One (1) Assembly Operation, identified as AO1, approved in 2018 for construction, with a maximum capacity of 3.50 parts per hour, using roll, flow, or brush application, applying coatings to the exterior of marine vessels, using no controls, and exhausting indoors.

Under 40 CFR 63, Subpart PPPP, the assembly operation is considered a new 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)]


(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 PPPP.

(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
E.1.2 National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products NESHAP [40 CFR Part 63, Subpart PPPP] [326 IAC 20-81]

The Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart PPPP (included as Attachment A to the operating permit), which are incorporated by reference as 326 IAC 20-81, for the emission unit(s) listed above when applying coatings to plastic parts:

(1) 40 CFR 63.4480;
(2) 40 CFR 63.4481(a)(1), (a)(2), (b), (c)(15), (d), and (e);
(3) 40 CFR 63.4482(a), (b), and (c);
(4) 40 CFR 63.4483(a)(2), (c)(1), and (d);
(5) 40 CFR 63.4490(a)(1) and (c)(1);
(6) 40 CFR 63.4491(a) and (b);
(7) 40 CFR 63.4492(a);
(8) 40 CFR 63.4493(a) and (c);
(9) 40 CFR 63.4500(a)(1) and (b);
(10) 40 CFR 63.4501;
(11) 40 CFR 63.4510(a), (b), (c)(1) through (7), (c)(8)(i), and (c)(8)(ii);
(12) 40 CFR 63.4520(a)(1) through (a)(6);
(13) 40 CFR 63.4530(a), (b), (c)(1) through (c)(3), (d), (e), (f), (g), and (h);
(14) 40 CFR 63.4531;
(15) 40 CFR 63.4540;
(16) 40 CFR 63.4541;
(17) 40 CFR 63.4542;
(18) 40 CFR 63.4550;
(19) 40 CFR 63.4551;
(20) 40 CFR 63.4552;
(21) 40 CFR 63.4580;
(22) 40 CFR 63.4581;
(23) Table 2 to Subpart PPPP of Part 63;
(24) Table 3 to Subpart PPPP of Part 63;
(25) Table 4 to Subpart PPPP of Part 63;
(26) Appendix A to Subpart PPPP of Part 63.

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

E.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

A Preventive Maintenance Plan is required for these facilities and any control devices. Section B - Preventive Maintenance Plan contains the Permittee’s obligation with regard to the preventive maintenance plan required by this condition.
Emissions Unit Description:

### Plant 1

(a) One (1) aluminum boat assembly operation, constructed in 2018, and approved in 2019 for modification, each using roll, flow, or brush application, using no controls, exhausting indoors, and consisting of the following:

(2) Two (2) metal jacket stations, with a maximum capacity of 0.25 gallons per unit and 3.5 units per hour;

   Under 40 CFR 63, Subpart VVVV, the metal jacket stations are considered new affected facilities.

(4) Two (2) carpet (vinyl) adhesive stations, with a maximum capacity of 2.5 gallons per unit and 3.5 units per hour;

   Under 40 CFR 63, Subpart VVVV, the carpet adhesive stations are considered new affected facilities.

(b) One (1) Gel Application Station, identified as GC1, approved in 2018 for construction, with a maximum capacity of 3.50 parts per hour, using airless, air assisted containment (ACC) gun, using a dry particulate filter as control, and exhausting to stack GC1S.

   Under 40 CFR 63, Subpart VVVV, the gel application booth is considered a new affected facility.

(c) One (1) Resin Application Station, identified as CG1, approved in 2018 for construction, with a maximum capacity of 3.50 parts per hour, using roll, flow, brush application, and/or FIT application (non-atomized mechanical applicator), using a dry particulate filter as control, and exhausting to stack CG1S.

   Under 40 CFR 63, Subpart VVVV, the resin application booth is considered a new affected facility.

(d) One (1) Resin Hand Layup Area, identified as HL1, approved in 2018 for construction, with a maximum capacity of 3.50 parts per hour, using roll, flow, or brush application, and exhausting indoors.

   Under 40 CFR 63, Subpart VVVV, the resin hand layup area is considered a new affected facility.

(f) One (1) Paint Booth 2, identified as PB2, approved in 2018 for construction, with a maximum capacity of 3.50 parts per hour, using HVLP application, applying coatings to the exterior of marine vessels, using a dry filter for particulate control, and exhausting to stack PB2S.

   Under 40 CFR 63, Subpart PPPP, the paint booth 2 is considered a new affected facility, when applying coatings to plastic parts.

   Under 40 CFR 63, Subpart VVVV, the paint booth 2 is considered a new affected facility, when applying gel coats to fiberglass components of the aluminum boats.

### Plant 2
One (1) aluminum boat assembly operation, approved in 2021 for construction, each using roll, flow, or brush application, uncontrolled, exhausting indoors, and consisting of the following:

- (2) One (1) metal jacket station, with a maximum capacity of 0.25 gallons per unit and 1.75 units per hour;
  
  Under 40 CFR 63, Subpart VVVV, the metal jacket station is considered a new affected facility.

- (4) One (1) carpet (vinyl) adhesive station, with a maximum capacity of 2.5 gallons per unit and 1.75 units per hour;
  
  Under 40 CFR 63, Subpart VVVV, the carpet adhesive station is considered a new affected facility.

Insignificant Activities:

Plant 1

- (a) One (1) touch-up paint booth, identified as PB1, approved in 2018 for construction, consisting of two (2) HVLP spray guns, applying coatings to the exterior of marine vessels, with a combined maximum capacity of 1.0 unit per hour, using dry filters as particulate control, and exhausting to stack PBSV1.
  
  Under 40 CFR 63, Subpart PPPP, the touch-up paint booth is considered a new affected facility, when applying coatings to plastic parts.

  Under 40 CFR 63, Subpart VVVV, the touch-up paint booth is considered a new affected facility, when applying gel coats to fiberglass components of the aluminum boats.

- (h) One (1) Mold Preparation & Cleanup Operation, identified as MP1, approved in 2018 for construction, with a maximum capacity of 0.03 parts per hour, using roll, flow, or brush application, using no controls, and exhausting indoors.
  
  Under 40 CFR 63, Subpart VVVV, the mold preparation and cleanup operation is considered a new 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)]


- (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
E.2.2 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 B to the operating permit), which are incorporated by reference as 326 IAC 20-48, for the emission unit(s) listed above, when applying gelcoat and/or resin:

1. 40 CFR 63.5680;
2. 40 CFR 63.5683(a), (b), and (c);
3. 40 CFR 63.5686;
4. 40 CFR 63.5689;
5. 40 CFR 63.5692(a);
6. 40 CFR 63.5695;
7. 40 CFR 63.5698;
8. 40 CFR 63.5701;
9. 40 CFR 63.5704;
10. 40 CFR 63.5707;
11. 40 CFR 63.5710;
12. 40 CFR 63.5713;
13. 40 CFR 63.5714;
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;
27. 40 CFR 63.5767;
28. 40 CFR 63.5770;
29. 40 CFR 63.5773;
30. 40 CFR 63.5776;
31. 40 CFR 63.5779;
32. Table 1 to Subpart VVVV of Part 63;
33. Table 2 to Subpart VVVV of Part 63;
34. Table 3 to Subpart VVVV of Part 63;
35. Table 5 to Subpart VVVV of Part 63;
36. Table 6 to Subpart VVVV of Part 63;
37. Table 7 to Subpart VVVV of Part 63;
38. Table 8 to Subpart VVVV of Part 63.

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

E.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

A Preventive Maintenance Plan is required for these facilities and any control devices. Section B - Preventive Maintenance Plan contains the Permittee’s obligation with regard to the preventive maintenance plan required by this condition.
Source Name: Barletta Boat Company
Source Address: 51687 County Road 133, Bristol, Indiana 46507
Part 70 Permit No.: T039-40049-00807

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:
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:
<table>
<thead>
<tr>
<th>If any of the following are not applicable, mark N/A</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Date/Time Emergency started:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Date/Time Emergency was corrected:</td>
</tr>
<tr>
<td>Was the facility being properly operated at the time of the emergency?   Y   N</td>
</tr>
<tr>
<td>Type of Pollutants Emitted: TSP, PM-10, SO₂, VOC, NOₓ, CO, Pb, other:</td>
</tr>
<tr>
<td>Estimated amount of pollutant(s) emitted during emergency:</td>
</tr>
<tr>
<td>Describe the steps taken to mitigate the problem:</td>
</tr>
<tr>
<td>Describe the corrective actions/response steps taken:</td>
</tr>
<tr>
<td>Describe the measures taken to minimize emissions:</td>
</tr>
<tr>
<td>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:</td>
</tr>
</tbody>
</table>

Form Completed by: ________________________________
Title / Position: ________________________________
Date: ________________________________
Phone: ________________________________
Source Name: Barletta Boat Company
Source Address: 51687 County Road 133, Bristol, Indiana 46507
Part 70 Permit No.: T039-40049-00807
Facility: Paint booth 2 (PB2)
Parameter: VOC
Limit: The VOC input, including coatings, dilution, and cleaning solvents to the paint booth 2 (PB2) shall not exceed 24.9 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

<table>
<thead>
<tr>
<th>QUARTER</th>
<th>YEAR</th>
</tr>
</thead>
<tbody>
<tr>
<td>Month</td>
<td>Column 1</td>
</tr>
<tr>
<td></td>
<td>This Month (tons)</td>
</tr>
</tbody>
</table>

☐ No deviation occurred in this quarter.

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

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

<table>
<thead>
<tr>
<th>Permit Requirement (specify permit condition #)</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Date of Deviation:</td>
<td>Duration of Deviation:</td>
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<tr>
<td>Number of Deviations:</td>
<td></td>
</tr>
<tr>
<td>Probable Cause of Deviation:</td>
<td></td>
</tr>
<tr>
<td>Response Steps Taken:</td>
<td></td>
</tr>
</tbody>
</table>

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<th>Permit Requirement (specify permit condition #)</th>
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</tr>
<tr>
<td>Probable Cause of Deviation:</td>
<td></td>
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<tr>
<td>Response Steps Taken:</td>
<td></td>
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<tr>
<td>Permit Requirement (specify permit condition #)</td>
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<td>-------------------------------------------------</td>
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<tr>
<td>Probable Cause of Deviation:</td>
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<tr>
<td>Response Steps Taken:</td>
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<td>Number of Deviations:</td>
<td></td>
</tr>
<tr>
<td>Probable Cause of Deviation:</td>
<td></td>
</tr>
<tr>
<td>Response Steps Taken:</td>
<td></td>
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</tbody>
</table>

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<tr>
<th>Permit Requirement (specify permit condition #)</th>
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<tbody>
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<td></td>
</tr>
<tr>
<td>Probable Cause of Deviation:</td>
<td></td>
</tr>
<tr>
<td>Response Steps Taken:</td>
<td></td>
</tr>
</tbody>
</table>

Form Completed by: ______________________________
Title / Position: ________________________________
Date: ________________________________
Phone: ________________________________
Affidavit of Construction

I, ____________, being duly sworn upon my oath, depose and say:

(Name of the Authorized Representative)

1. I live in ____________, County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.

2. I hold the position of ____________ for ____________.

   (Title)           (Company Name)

3. By virtue of my position with ____________, I have personal knowledge of the representations contained in this affidavit and am authorized to make these representations on behalf of ____________.

   (Company Name)

4. I hereby certify that Barletta Boat Company 51687 County Road 133, Bristol, Indiana 46507, completed construction of the pontoon boat manufacturing facility on ____________, in conformity with the requirements and intent of the construction permit application received by the Office of Air Quality on _______________ and as permitted pursuant to New Source Construction Permit and Part 70 Operating Permit No. T039-40049-00807, Plant ID No. 039-00807 issued on __________.

5. Permittee, please cross out the following statement if it does not apply: Additional (operations/facilities) were constructed/substituted as described in the attachment to this document and were not made in accordance with the construction permit.

Further Affiant said not.

I affirm under penalties of perjury that the representations contained in this affidavit are true, to the best of my information and belief.

Signature __________________________________________________________________________

Date ______________________________________________________________________________

STATE OF INDIANA)

)SS

COUNTY OF ________________

Subscribed and sworn to me, a notary public in and for ________________ County and State of Indiana on this ________________ day of ________________, 20__, My Commission expires: ________________.

Signature __________________________________________________________________________

Name ______________________________________________________________________________ (typed or printed)
Source Description and Location

Source Name: Barletta Boat Company
Source Location: 51687 County Road 133, Bristol, Indiana 46507
County: Elkhart
SIC Code: 3732 (Boat Building and Repairing)
Operation Permit No.: T039-40049-00807
Operation Permit Issuance Date: September 18, 2018
Minor Source Modification No.: 039-43532-00807
Minor Permit Modification No.: 039-43547-00807
Permit Reviewer: Alexandrea Neuzerling

Existing Approvals

The source was issued Part 70 Operating Permit No. T039-40049-00807 on September 18, 2018. The source has since received the following approvals:

(a) Minor Source Modification No. 039-40725-00807, issued on January 10, 2019; and
(b) Significant Permit Modification No. 039-40873-00807, issued on March 19, 2019.

County Attainment Status

The source is located in Elkhart County.

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Designation</th>
</tr>
</thead>
<tbody>
<tr>
<td>SO₂</td>
<td>Better than national standards.</td>
</tr>
<tr>
<td>CO</td>
<td>Unclassifiable or attainment effective November 15, 1990.</td>
</tr>
<tr>
<td>O₃</td>
<td>Unclassifiable or attainment effective August 3, 2018, for the 2015 8-hour ozone standard.</td>
</tr>
<tr>
<td>PM₂.₅</td>
<td>Unclassifiable or attainment effective April 15, 2015, for the 2012 annual PM₂.₅ standard.</td>
</tr>
<tr>
<td>PM₂.₅</td>
<td>Unclassifiable or attainment effective December 13, 2009, for the 2006 24-hour PM₂.₅ standard.</td>
</tr>
<tr>
<td>PM₁₀</td>
<td>Unclassifiable effective November 15, 1990.</td>
</tr>
<tr>
<td>NO₂</td>
<td>Unclassifiable or attainment effective January 29, 2012, for the 2010 NO₂ standard.</td>
</tr>
<tr>
<td>Pb</td>
<td>Unclassifiable or attainment effective December 31, 2011, for the 2008 lead standard.</td>
</tr>
</tbody>
</table>

(a) Ozone Standards
Volatile organic compounds (VOC) and Nitrogen Oxides (NOₓ) 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 NOₓ 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 NOₓ emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) PM₂.₅
Elkhart County has been classified as attainment for PM₂.₅. Therefore, direct PM₂.₅, SO₂, and NOₓ emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
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](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.

<table>
<thead>
<tr>
<th>Source-Wide Emissions Prior to Modification (ton/year)</th>
<th>PM</th>
<th>PM_{10}</th>
<th>PM_{2.5}</th>
<th>SO_{2}</th>
<th>NO_{x}</th>
<th>VOC</th>
<th>CO</th>
<th>Single HAP</th>
<th>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total PTE of Entire Source Excluding Fugitive Emissions*</td>
<td>50.02</td>
<td>50.10</td>
<td>50.10</td>
<td>0.01</td>
<td>1.42</td>
<td>153.07</td>
<td>1.19</td>
<td>69.23</td>
<td>108.30</td>
</tr>
<tr>
<td>Title V Major Source Thresholds</td>
<td>NA</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>10</td>
<td>25</td>
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<tr>
<td>PSD Major Source Thresholds</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
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</tr>
</tbody>
</table>

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=Styrene
*Fugitive HAP emissions are always included in the source-wide emissions.

The internal dust collector for the woodworking operation (INDC) is considered an integral control device. The PTE shown is the PTE after consideration of this integral control device.
(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 Significant Permit Modification No. 039-40873-00807, issued on March 19, 2019.

### Description of Proposed Modification

The Office of Air Quality (OAQ) has reviewed an application, submitted by Barletta Boat Company on December 4, 2020, relating to the following:

(1) Constructing a new building, identified as Plant 2, on the same property as the existing, permitted building, now identified as Plant 1. Plant 2 consists of the following emission units:

(a) One (1) aluminum boat assembly operation, approved in 2021 for construction, each using roll, flow, or brush application, uncontrolled, exhausting indoors, and consisting of the following:

(1) One (1) surface coating assembly line, identified as Line 3, with a maximum capacity of 0.4 gallons per unit and 1.75 units per hour;

(2) One (1) metal jacket station, with a maximum capacity of 0.25 gallons per unit and 1.75 units per hour;

Under 40 CFR 63, Subpart VVVV, the metal jacket station is considered a new affected facility.

(3) One (1) final finish station, with a maximum capacity of 0.03 gallons per unit and 1.75 units per hour;

(4) One (1) carpet (vinyl) adhesive station, with a maximum capacity of 2.5 gallons per unit and 1.75 units per hour;

Under 40 CFR 63, Subpart VVVV, the carpet adhesive station is considered a new affected facility.

(b) Seventy-five (75) aluminum welders, identified as Weld3, approved in 2021 for construction, each with a maximum capacity of 1.0 lb wire/hour, each using no controls, and each exhausting indoors.

(c) Two (2) aluminum cutting stations, identified as ALCut3, approved in 2021 for construction, each with a maximum capacity of 85 lbs/hour, exhausting indoors, and consisting of the following:

(1) One (1) bit cutter, identified as BC1, controlled by an internal dust collection system for particulate control, identified as INBH1.

(2) One (1) double upcut saw, identified as UCS1, controlled by an internal dust collection system for particulate control, identified as INBH2.
(d) Four (4) natural gas-fired thermocycler heaters, identified as TCH1-TCH4, approved in 2021 for construction, each with a heat input capacity of 0.72 MMBtu/hr, each using no control, and each exhausting outdoors.

(e) One (1) natural gas-fired heater, identified as OH1, approved in 2021 for construction, each with a heat input capacity of 1.1 MMBtu/hr, using no control, and exhausting outdoors.

**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.

<table>
<thead>
<tr>
<th>Process / Emission Unit</th>
<th>PM</th>
<th>PM10</th>
<th>PM2.5</th>
<th>SO2</th>
<th>NOx</th>
<th>VOC</th>
<th>CO</th>
<th>Single HAP</th>
<th>Total HAP</th>
</tr>
</thead>
<tbody>
<tr>
<td>Plant 2</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Assembly Line 3</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>1.80</td>
<td>-</td>
<td>1.80</td>
<td>2.51</td>
</tr>
<tr>
<td>Metal Jacket</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>3.47</td>
<td>-</td>
<td>0.76</td>
<td>0.76</td>
</tr>
<tr>
<td>Final Finish</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>10.81</td>
<td>-</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Carpet Adhesive</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>0.64</td>
<td>-</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Welding</td>
<td>1.81</td>
<td>1.81</td>
<td>1.81</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>0.16</td>
<td>0.16</td>
</tr>
<tr>
<td>Aluminum Cutting</td>
<td>1.06</td>
<td>1.06</td>
<td>1.06</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td></td>
<td></td>
</tr>
<tr>
<td>NG Combustion</td>
<td>0.03</td>
<td>0.13</td>
<td>0.13</td>
<td>0.01</td>
<td>1.71</td>
<td>0.09</td>
<td>1.44</td>
<td>0.03</td>
<td>0.03</td>
</tr>
</tbody>
</table>

**Fugitives**

<table>
<thead>
<tr>
<th>Process / Emission Unit</th>
<th>PM</th>
<th>PM10</th>
<th>PM2.5</th>
<th>SO2</th>
<th>NOx</th>
<th>VOC</th>
<th>CO</th>
<th>Single HAP</th>
<th>Total HAP</th>
</tr>
</thead>
<tbody>
<tr>
<td>Plant 2 Paved Roads</td>
<td>0.14</td>
<td>0.03</td>
<td>0.01</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Plant 1 Unpaved Roads</td>
<td>3.38</td>
<td>0.90</td>
<td>0.09</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Total PTE Before Controls of the New Emission Units:</strong></td>
<td>6.42</td>
<td>3.93</td>
<td>3.10</td>
<td>0.01</td>
<td>1.71</td>
<td>1.80</td>
<td>16.81</td>
<td>1.44</td>
<td>3.47</td>
</tr>
</tbody>
</table>

1PM2.5 listed is direct PM2.5.
2Single highest HAP.
Appendix A of this TSD reflects the detailed potential emissions of the modification.

(a) Approval to Construct

(A) Pursuant to 326 IAC 2-7-10.5(e)(1)(A), a Minor Source Modification is required because this modification has the potential to emit PM that is less than twenty-five (25) tons per year and equal to or greater than five (5) tons per year.

(B) Pursuant to 326 IAC 2-7-10.5(e)(1)(B), a Minor Source Modification is required because this modification has the potential to emit VOC that is less than twenty-five (25) tons per year and equal to or greater than ten (10) tons per year.

(b) Approval to Operate

Pursuant to 326 IAC 2-7-12(b)(1), this change to the permit is being made through a Minor Permit Modification because:

(A) The modification does not violate any applicable requirement.

(B) The modification does not involve significant changes to existing monitoring, reporting or record keeping requirements in the Part 70 permit.

(C) The modification does not require or change:
   (i) a case-by-case determination of an emission limitation or other standard;
   (ii) source specific determination for temporary sources of ambient impacts; or
   (iii) visibility or increment analysis.

(D) The modification does not seek to establish or change a Part 70 permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject. This includes the following:
   (i) A federally enforceable emissions cap assumed to avoid classification as a modification under any provision of Title I of the CAA.
   (ii) An alternative emissions limit approved under regulations promulgated under Section 112(i)(5) of the CAA.

(E) This change is not a modification under any provision of Title I of the CAA.

(F) This change is not required by the Part 70 program to be processed as a significant modification.

<table>
<thead>
<tr>
<th>Permit Level Determination – PSD</th>
</tr>
</thead>
</table>

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.
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.

<table>
<thead>
<tr>
<th>Source-Wide Emissions After Issuance (ton/year)</th>
<th>PM</th>
<th>PM$_{10}$</th>
<th>PM$_{2.5}$</th>
<th>SO$_2$</th>
<th>NO$_x$</th>
<th>VOC</th>
<th>CO</th>
<th>Single HAP$^3$</th>
<th>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total PTE of Entire Source Excluding Fugitives*</td>
<td>52.92</td>
<td>53.10</td>
<td>53.10</td>
<td>0.02</td>
<td>3.13</td>
<td>169.88</td>
<td>2.63</td>
<td>69.23</td>
<td>111.77</td>
</tr>
<tr>
<td>Title V Major Source Thresholds</td>
<td>NA</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>10</td>
<td>25</td>
<td></td>
</tr>
<tr>
<td>PSD Major Source Thresholds</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>--</td>
<td>--</td>
<td></td>
</tr>
</tbody>
</table>

$^1$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 = Styrene

*Fugitive HAP emissions are always included in the source-wide emissions.

(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):**

(a) The requirements of the New Source Performance Standard for Automobile and Light Duty Truck Surface Coating Operations, 40 CFR 60, Subpart MM and 326 IAC 12, are not included in the permit for assembly line 3, metal jacket, carpet adhesive, and final finish 3 stations, because these units do not coat automobiles or light duty trucks. This source is a stationary pontoon boat manufacturer.

(b) The requirements of the New Source Performance Standard for Surface Coating of Metal Furniture, 40 CFR 60, Subpart EE and 326 IAC 12, are not included in the permit for assembly line 3, metal jacket, carpet adhesive, and final finish 3 stations, because these units do not coat metal furniture. This source is a stationary pontoon boat manufacturer.

(c) The requirements of the New Source Performance Standard for Metal Coil Surface Coating, 40 CFR 60, Subpart TT and 326 IAC 12, are not included in the permit for assembly line 3, metal jacket, carpet adhesive, and final finish 3 stations, because these units do not coat metal coils. This source is a stationary pontoon boat manufacturer.

(d) The requirements of the New Source Performance Standard for the Beverage Can Surface Coating Industry, 40 CFR 60, Subpart WW and 326 IAC 12, are not included in the permit for assembly line 3, metal jacket, carpet adhesive, and final finish 3 stations, because these units do not coat beverage cans. This source is a stationary pontoon boat manufacturer.

(e) The requirements of the New Source Performance Standard for Industrial Surface Coating: Surface Coating of Plastic Parts for Business Machines, 40 CFR 60, Subpart TTT and 326 IAC 12, are not included in the permit for assembly line 3, metal jacket, carpet adhesive, and final finish 3 stations, because these units do not coat plastic parts for business machines. This source is a stationary pontoon boat manufacturer.

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

**National Emission Standards for Hazardous Air Pollutants (NESHAP):**

(h) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Shipbuilding and Ship Repair (Surface Coating), 40 CFR 63, Subpart II and 326 IAC 20-26, are not included in the permit for assembly line 3, metal jacket, carpet adhesive, and final finish 3 stations, since this source manufactures pontoon boats which are not considered ships under 40 CFR 63.782. "Ship means any marine or fresh-water vessel used for military or commercial operations, including self-propelled vessels, those propelled by other craft (barges), and navigational aids (buoys). This definition included, but is not limited to, all military and Coast Guard vessels, commercial cargo and passenger (cruise) ships, ferries, barges, tankers, container ships, patrol and pilot boats, and dredges. For purposes of this subpart, pleasure crafts and offshore oil and gas drilling platforms are not considered ships."

(i) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs): Surface Coating of Automobiles and Light-Duty Trucks, 40 CFR 63, Subpart III and 326 IAC 20-85, are not included in the permit for assembly line 3, metal jacket, carpet adhesive, and final finish 3 stations, since these stations do not coat automobiles or light-duty trucks. This source is a stationary pontoon boat manufacturer.

(j) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs): Surface Coating of Metal Cans, 40 CFR 63, Subpart KKKK and 326 IAC 20-86, are not included
in the permit for assembly line 3, metal jacket, carpet adhesive, and final finish 3 stations, since these stations do not coat metal cans. This source is a stationary pontoon boat manufacturer.

(k) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Miscellaneous Metal Parts and Products, 40 CFR 63, Subpart MMMM and 326 IAC 20-80, are not included in the permit for the aluminum boat surface coating facility metal jacket station and carpet adhesive station. Pursuant to 40 CFR 63.3881(c)(15), these emission units are not subject to the requirements of this subpart, because they are subject to the requirements under 40 CFR 63 Subpart VVVV.

The final finish 3 station is not subject to the requirements of Subpart MMMM, because under Section 63.3881(c)(1), these emission units do not contain any HAPs as determined according to Section 63.3941(a).

The aluminum boat surface coating facility assembly line Line 3 is not subject to the requirements of Subpart MMMM because under Section 63.3981, the use of sealants are not coatings as defined in this subpart.

(l) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs): Surface Coating of Large Appliances, 40 CFR 63, Subpart NNNN and 326 IAC 20-63, are not included in the permit for assembly line 3, metal jacket, carpet adhesive, and final finish 3 stations, since these stations do not coat large appliances. This source is a stationary pontoon boat manufacturer.

(m) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Plastic Parts and Products, 40 CFR 63, Subpart PPPP and 326 IAC 20-81, are not included in the permit for assembly line 3, metal jacket, carpet adhesive, and final finish 3 stations, since these stations do not coat plastic parts. These emission units are coating metal, wood, and felt. The final finish 3 stations coat plastic, however, pursuant to Section 63.4481(b), the final finish 3 stations do not use coating or cleaning materials that contain HAPs and are therefore not subject to the requirements of 40 CFR 63, Subpart PPPP.

(n) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs): Surface Coating of Wood Building Products, 40 CFR 63, Subpart QQQQ and 326 IAC 20-79, are not included in the permit for assembly line 3, metal jacket, carpet adhesive, and final finish 3 stations, since these stations do not coat wood building products as described in 40 CFR 63.4681(a).

(o) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs): Surface Coating of Metal Furniture, 40 CFR 63, Subpart RRRR and 326 IAC 20-78, are not included in the permit for assembly line 3, metal jacket, carpet adhesive, and final finish 3 stations, since these stations do not coat metal furniture as described in 40 CFR 63.4881(a)(2).

(p) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs): Surface Coating of Metal Coil, 40 CFR 63, Subpart SSSS and 326 IAC 20-64, are not included in the permit for assembly line 3, metal jacket, carpet adhesive, and final finish 3 stations, since these stations do not coat metal coils.

(q) The metal jacket and carpet adhesive stations are 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 20-48. The metal jacket is subject to the requirements since it coats aluminum boat surfaces. The carpet adhesive station is subject since it is a carpet and fabric adhesive operation, per 40 CFR 63.5689(e). Furthermore, these emission units are classified as new boat manufacturing facilities located at a major source of HAPs, that falls under 40 CFR 63.5683(a)(1) and (2).
The assembly line 3 and final finish 3 stations are not subject to the provisions of Subpart VVVV, because, pursuant to 40 CFR 63.5680, they do not apply a resin or gel coating, are not carpet and fabric adhesive operations, nor do they coat aluminum material. Assembly Line 3 applies a polyurethane sealant, the sealant is not deemed a gel or resin coating per 40 CFR 63.5779, because it does not contain styrene or methyl methacrylate. The final finish 3 station applies cleaning products that also do not qualify as gel or resin coating per 40 CFR 63.5779.

Metal Jack and Carpet Adhesive are subject to the following portions of Subpart VVVV:

(1) 40 CFR 63.5680;
(2) 40 CFR 63.5683(a), (b), and (c);
(3) 40 CFR 63.5686;
(4) 40 CFR 63.5689;
(5) 40 CFR 63.5692(a);
(6) 40 CFR 63.5695;
(7) 40 CFR 63.5698;
(8) 40 CFR 63.5701;
(9) 40 CFR 63.5704;
(10) 40 CFR 63.5707;
(11) 40 CFR 63.5710;
(12) 40 CFR 63.5713;
(13) 40 CFR 63.5714;
(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;
(27) 40 CFR 63.5767;
(28) 40 CFR 63.5770;
(29) 40 CFR 63.5773;
(30) 40 CFR 63.5776;
(31) 40 CFR 63.5779;
(32) Table 1 to Subpart VVVV of Part 63;
(33) Table 2 to Subpart VVVV of Part 63;
(34) Table 3 to Subpart VVVV of Part 63;
(35) Table 5 to Subpart VVVV of Part 63;
(36) Table 6 to Subpart VVVV of Part 63;
(37) Table 7 to Subpart VVVV of Part 63;
(38) Table 8 to Subpart VVVV of Part 63.

The requirements of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated as 326 IAC 20-1, apply to the metal jacket and final finish line 3 stations except as otherwise specified in 40 CFR 63, Subpart VVVV.

These requirements are already included in the existing permit for this source. The new metal jacket and final finish stations in Line 3, Plant 2 are now included in the emission units subject to these existing requirements.
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.

The following table is used to identify the applicability of CAM to new and modified emission unit and each emission limitation or standard for a specified pollutant based on the criteria specified under 40 CFR 64.2:

<table>
<thead>
<tr>
<th>Emission Unit/Pollutant</th>
<th>Control Device</th>
<th>Applicable Emission Limitation</th>
<th>Uncontrolled PTE (tons/year)</th>
<th>Controlled PTE (tons/year)</th>
<th>CAM Applicable (Y/N)</th>
<th>Large Unit (Y/N)</th>
</tr>
</thead>
<tbody>
<tr>
<td>BC1/PM/PM10/PM2.5</td>
<td>DC</td>
<td>-</td>
<td>&lt;100</td>
<td>-</td>
<td>N</td>
<td>-</td>
</tr>
<tr>
<td>UCS1/PM/PM10/PM2.5</td>
<td>DC</td>
<td>-</td>
<td>&lt;100</td>
<td>-</td>
<td>N</td>
<td>-</td>
</tr>
</tbody>
</table>

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.

Controls: BH = Baghouse, C = Cyclone, DC = Dust Collection System, RTO = Regenerative or Recuperative Thermal Oxidizer, WS = Wet Scrubber, ESP = Electrostatic Precipitator

Emission units without air pollution controls are not subject to CAM. Therefore, they are not listed.

Based on this evaluation, the requirements of 40 CFR Part 64, CAM, are not applicable to any of the new units as part of this modification because there is no emission limitation applicable to BC1 or UCS1.

**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 of this document.

**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 (constructed in 2018) will 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 this source is specifically regulated under NESHAP 40 CFR 63, Subpart VVVV, which was issued pursuant to Section 112(d), 112(h), or 112(j) of the CAA, this source is exempt from the requirements of 326 IAC 2-4.1.

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(1)

326 IAC 6-4 (Fugitive Dust Emissions Limitations)
The source is subject to the requirements of 326 IAC 6-4, because the Plant 2 paved roads and Plant 1 unpaved roads have the potential to emit fugitive particulate emissions. 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 (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.

<table>
<thead>
<tr>
<th>State Rule Applicability – Individual Facilities</th>
</tr>
</thead>
<tbody>
<tr>
<td>Due to this modification, state rule applicability has been reviewed as follows:</td>
</tr>
</tbody>
</table>

Plant 2 Aluminum Boat Assembly Operation (assembly Line 3, metal jacket, final finish, and carpet adhesive)

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
Even though, this aluminum boat assembly operation was constructed after January 1, 1980, it is not subject to the requirements of 326 IAC 8-1-6 because its total unlimited VOC potential emissions are less than twenty-five (25) tons per year.
326 IAC 8-2-9 (Miscellaneous Metal and Plastic Parts Coating Operations)

Pursuant to 326 IAC 8-2-1(a) the aluminum boat assembly operation is not subject to the requirements of 326 IAC 8-2-9 because it has uncontrolled potential emissions of less than fifteen (15) pounds of VOC per day.

Plant 2 Aluminum Welders (Weld3)

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

Pursuant to 326 IAC 6-3-1(b)(14), the aluminum welders are not subject to the requirements of 326 IAC 6-3, since they have potential emissions less than five hundred fifty-one thousandths (0.551) pound per hour.

Plant 2 Aluminum Cutting (ALCut3)

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

Pursuant to 326 IAC 6-3-1(b)(14), the aluminum cutting operations are not subject to the requirements of 326 IAC 6-3, since they have potential emissions less than five hundred fifty-one thousandths (0.551) pound per hour.

Plant 2 Natural Gas Combustion (TCH1-TCH4 and OH1)

326 IAC 6-2-1 (Particulate Emission Limitations for Sources of Indirect Heating)

Pursuant to 326 IAC 6-2-1(a), the natural gas fired heaters are not subject to the provisions of 326 IAC 6-2-4, since they are not sources of indirect heating.

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

Pursuant to 326 IAC 1-2-59, the natural gas fired heaters are not subject to the requirements of 326 IAC 6-3, since liquid and gaseous fuels and combustion air are not considered as part of the process weight.

326 IAC 7-1.1 Sulfur Dioxide Emission Limitations

The natural gas fired heaters are not subject to 326 IAC 326 IAC 7-1.1 because they have a potential to emit (or limited potential to emit) sulfur dioxide (SO2) of less than 25 tons per year or 10 pounds per hour.

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)

Even though, these natural gas fired heaters were constructed after January 1, 1980, they are not subject to the requirements of 326 IAC 8-1-6 because their unlimited VOC potential emissions are less than twenty-five (25) tons per year.

326 IAC 9-1 (Carbon Monoxide Emission Limits)

The requirements of 326 IAC 9-1 do not apply to the natural gas fired heaters, because this source does not operate a catalyst regeneration petroleum cracking system or a petroleum fluid coker, grey iron cupola, blast furnace, basic oxygen steel furnace, or other ferrous metal smelting equipment.

326 IAC 10-3 (Nitrogen Oxide Reduction Program for Specific Source Categories)

The requirements of 326 IAC 10-3 do not apply to the natural gas fired heaters, since these units are not a blast furnace gas-fired boiler, a Portland cement kiln, or a facility specifically listed under 326 IAC 10-3-1(a)(2).

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.

There are no new or modified compliance requirements included with this modification.

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. Sections A.2 and A.3 were updated to include the new emissions units:

A.2 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:

**Plant 1**

(a) One (1) aluminum boat assembly operation, constructed in 2018, and approved in 2019 for modification, each using roll, flow, or brush application, using no controls, exhausting indoors, and consisting of the following:

... (strikethrough)

(4) Two (2) carpet (vinyl) adhesive stations, with a maximum capacity of 2.5 gallons per unit and 3.5 units per hour;

Under 40 CFR 63, Subpart VVVV, the carpet adhesive stations are considered new affected facilities.

... (strikethrough)

**Plant 2**

(h) One (1) aluminum boat assembly operation, approved in 2021 for construction, each using roll, flow, or brush application, uncontrolled, exhausting indoors, and consisting of the following:

(1) One (1) surface coating assembly line, identified as Line 3, with a maximum capacity of 0.4 gallons per unit and 1.75 units per hour;

(2) One (1) metal jacket station, with a maximum capacity of 0.25 gallons per unit and 1.75 units per hour;

Under 40 CFR 63, Subpart VVVV, the metal jacket station is considered a new affected facility.
(3) One (1) final finish station, with a maximum capacity of 0.03 gallons per unit and 1.75 units per hour;

(4) One (1) carpet (vinyl) adhesive station, with a maximum capacity of 2.5 gallons per unit and 1.75 units per hour;

Under 40 CFR 63, Subpart VVVV, the carpet adhesive station is considered a new affected facility.

A.3 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-7-4(c)][326 IAC 2-7-5(14)]

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

**Plant 1**

... 

(j) Paved and Unpaved Roads

... 

**Plant 2**

(m) Seventy-five (75) aluminum welders, identified as Weld3, approved in 2021 for construction, each with a maximum capacity of 1.0 lb wire/hour, each using no controls, and each exhausting indoors.

(n) Two (2) aluminum cutting stations, identified as ALCut3, approved in 2021 for construction, each with a maximum capacity of 85 lbs/hour, exhausting indoors, and consisting of the following:

(1) One (1) bit cutter, identified as BC1, controlled by an internal dust collection system for particulate control, identified as INBH1.

(2) One (1) double upcut saw, identified as UCS1, controlled by an internal dust collection system for particulate control, identified as INBH2.

(o) Four (4) natural gas-fired thermocycler heaters, identified as TCH1-TCH4, approved in 2021 for construction, each with a heat input capacity of 0.72 MMBtu/hr, each using no control, and each exhausting outdoors.

(p) One (1) natural gas-fired heater, identified as OH1, approved in 2021 for construction, each with a heat input capacity of 1.1 MMBtu/hr, using no control, and exhausting outdoors.

(q) Paved Roads

(2) The Emissions Unit Description box for Section E.2 was updated to include the new emission units:

**SECTION E.2**

**NESHAP**

<table>
<thead>
<tr>
<th>Emissions Unit Description:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Plant 1:</strong></td>
</tr>
</tbody>
</table>
(a) One (1) aluminum boat assembly operation, constructed in 2018, and approved in 2019 for modification, each using roll, flow, or brush application, using no controls, exhausting indoors, and consisting of the following:

(4) Two (2) carpet (vinyl) adhesive stations, with a maximum capacity of 2.5 gallons per unit and 3.5 units per hour;

Under 40 CFR 63, Subpart VVVV, the carpet adhesive stations are considered new affected facilities.

...(Plant 2)

(h) One (1) aluminum boat assembly operation, approved in 2021 for construction, each using roll, flow, or brush application, uncontrolled, exhausting indoors, and consisting of the following:

(2) One (1) metal jacket station, with a maximum capacity of 0.25 gallons per unit and 1.75 units per hour;

Under 40 CFR 63, Subpart VVVV, the metal jacket station is considered a new affected facility.

(4) One (1) carpet (vinyl) adhesive station, with a maximum capacity of 2.5 gallons per unit and 1.75 units per hour;

Under 40 CFR 63, Subpart VVVV, the carpet adhesive station is considered a new affected facility.

...(Additional Changes)

IDEM, OAQ made additional changes to the permit as described below in order to update the language to match the most current version of the applicable rule, to eliminate redundancy within the permit, and to provide clarification regarding the requirements of these conditions.

These permit changes include model updates to standard permit language that are applicable to this source,

(1) The United States Environmental Protection Agency address has been updated in sections B.11 and B.21 as follows:

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

... United States Environmental Protection Agency, Region 5

B.21 Operational Flexibility [326 IAC 2-7-20][326 IAC 2-7-10.5]

... United States Environmental Protection Agency, Region 5
(2) Effective June 8, 2019, the requirements of 326 IAC 14-10 (Emission Standards for Asbestos Demolition and Renovation Operations) were amended. Based on the amended rule, Section C.6 - Asbestos Abatement Projects of the permit has been revised as follows:

C.6 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2c).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3d).

(3) Section B - Annual Fee Payment of the permit has been revised as follows to include an updated phone number for the OAQ, Billing, Licensing, and Training Section:

B.25 Annual Fee Payment [326 IAC 2-1.1-7]

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section) to determine the appropriate permit fee.

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 December 4, 2020.

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Minor Source Modification No. 039-43532-00807. The operation of this proposed modification shall be subject to the conditions of the attached proposed Minor Permit Modification No. 039-43547-00807.

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

IDEM Contact

(a) If you have any questions regarding this permit, please contact Alexandrea Neuzerling, 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) 232-6634 or (800) 451-6027, and ask for Alexandrea Neuzerling or (317) 232-6634.

(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:** Barletta Boat Company
- **Source Address:** 51687 County Road 133, Bristol, IN 46507
- **Operating Permit No.:** T039-40049-00807
- **Minor Source Modification No.:** 039-43532-00807
- **Minor Permit Modification No.:** 039-43547-00807
- **Reviewer:** Alexandrea Neuzerling

### Uncontrolled Potential to Emit (tons/yr)

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<th>Emission Unit</th>
<th>PM</th>
<th>PM10</th>
<th>PM2.5 *</th>
<th>SO₂</th>
<th>NOx</th>
<th>VOC</th>
<th>CO</th>
<th>Total HAPs</th>
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* PM2.5 listed is direct PM2.5
## Appendix A: Emission Calculations

### PTE Summary

**Company Name:** Barletta Boat Company  
**Source Address:** 51687 County Road 133, Bristol, IN 46507  
**Operating Permit No.:** T039-40049-00807  
**Minor Source Modification No.:** 039-43532-00807  
**Minor Permit Modification No.:** 039-43547-00807  
**Reviewer:** Alexandrea Neuzerling

<table>
<thead>
<tr>
<th>Controlled Potential to Emit (tons/yr)</th>
<th>PM</th>
<th>PM10</th>
<th>PM2.5 *</th>
<th>SO2</th>
<th>NOx</th>
<th>VOC</th>
<th>CO</th>
<th>Total HAPs</th>
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<td><strong>Plant 1</strong></td>
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<tr>
<td>NG Combustion Heaters (H1 through H31)</td>
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### Fugitives

| Fugitives                            |  |  |  |  |  |  |  |  |
|--------------------------------------|  |  |  |  |  |  |  |  |
| Plant 1 Paved Roads                  | 1.25 | 0.25 | 0.06 | -- | -- | -- | -- | --         |
| Plant 1 Unpaved Roads                | 3.38 | 0.90 | 0.09 | -- | -- | -- | -- | --         |
| Plant 2 Paved Roads                  | 0.14 | 0.03 | 0.01 | -- | -- | -- | -- | --         |
| **Total**                            | 16.61 | 13.20 | 12.18   | 0.02 | 3.13 | 203.30 | 2.63 | 111.77     |

*PM2.5 listed is direct PM2.5
Appendix A: Emission Calculations

PTE Summary

Company Name: Barletta Boat Company
Source Address: 51687 County Road 133, Bristol, IN 46507
Operating Permit No.: T039-40049-00807
Minor Source Modification No.: 039-43532-00807
Minor Permit Modification No.: 039-43547-00807
Reviewer: Alexandrea Neuzerling

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*PM2.5 listed is direct PM2.5

Limited Pollutants
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<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
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<tr>
<td>Stannous dichloride</td>
<td>0.00</td>
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<td>0.00</td>
<td>0.0E+00</td>
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<tr>
<td>MMA</td>
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<td>0.00</td>
<td>0.0E+00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
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Combined Total: 108.30

Worst Case HAP: 68.23

### Plant 2 - Uncontrolled Potential to Emit HAPs (ton/year)

<table>
<thead>
<tr>
<th>HAPs</th>
<th>Assembly Line 2</th>
<th>Metal Jacket</th>
<th>Final Finish</th>
<th>Carpet Adhesive</th>
<th>Welding</th>
<th>Aluminum Cutting</th>
<th>NG Combustion</th>
<th>Total</th>
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<tr>
<td>Vitrone</td>
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<td>-</td>
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<tr>
<td>Methylene</td>
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<td>MEK</td>
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<td>Methylacrylate</td>
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<td>Hexamethylenetetramine</td>
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<td>Vinyl chloride</td>
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<td>Stannous dichloride</td>
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<td>-</td>
<td>-</td>
<td>-</td>
<td>1.28E-03</td>
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<tr>
<td>Chloroform</td>
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<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>1.28E-03</td>
<td>1.28E-03</td>
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<tr>
<td>Combined Total</td>
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<td></td>
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<td>2.47</td>
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Worst Case HAP: 1.80
## Appendix A: Emission Calculations

### PTE Summary of the Modification

**Company Name:** Barletta Boat Company  
**Source Address:** 51687 County Road 133, Bristol, IN 46507  
**Operating Permit No.:** T039-40049-00807  
**Minor Source Modification No.:** 039-43532-00807  
**Minor Permit Modification No.:** 039-43547-00807  
**Reviewer:** Alexandrea Neuzerling

### Uncontrolled Potential to Emit (tons/yr)

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>PM</th>
<th>PM10</th>
<th>PM2.5 *</th>
<th>SO₂</th>
<th>NOx</th>
<th>VOC</th>
<th>CO</th>
<th>Total HAPs</th>
<th>Worst Single HAP</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Plant 2</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Assembly Line 3</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>-</td>
<td>-</td>
<td>1.80</td>
<td>-</td>
<td>2.51</td>
<td>1.80 Xylene</td>
</tr>
<tr>
<td>Metal Jacket</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>-</td>
<td>-</td>
<td>3.47</td>
<td>-</td>
<td>0.76</td>
<td>0.76 Methanol</td>
</tr>
<tr>
<td>Final Finish</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>-</td>
<td>-</td>
<td>10.81</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Carpet Adhesive</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>-</td>
<td>-</td>
<td>0.64</td>
<td>-</td>
<td>-</td>
<td>-</td>
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<tr>
<td>Welding</td>
<td>1.81</td>
<td>1.81</td>
<td>1.81</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>0.16</td>
<td>0.16 Manganese</td>
</tr>
<tr>
<td>Aluminum Cutting</td>
<td>1.06</td>
<td>1.06</td>
<td>1.06</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>NG Combustion</td>
<td>0.03</td>
<td>0.13</td>
<td>0.13</td>
<td>0.01</td>
<td>1.71</td>
<td>0.09</td>
<td>1.44</td>
<td>0.03</td>
<td>0.03 Hexane</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td>2.90</td>
<td>3.00</td>
<td>3.00</td>
<td>0.01</td>
<td>1.71</td>
<td>16.81</td>
<td>1.44</td>
<td>3.47</td>
<td>1.80 Xylene</td>
</tr>
</tbody>
</table>

| **Fugitives**       |     |      |         |     |     |     |     |            |                 |
| Plant 2 Paved Roads | 0.14| 0.03 | 0.01    | -   | -   | -   | -   | -          | -               |
| Plant 1 Unpaved Roads | 3.38 | 0.90 | 0.09   | -   | -   | -   | -   | -          | -               |
| **Total with Fugitives** | 6.42 | 3.93 | 3.10   | 0.01| 1.71| 16.81| 1.44| 3.47       | 1.80 Xylene     |

* PM2.5 listed is direct PM2.5
Appendix A: Emissions Calculations
VOC and Particulate
From Plant 2 Assembly Line 3

Company Name: Barletta Boat Company
Source Address: 51687 County Road 133, Bristol, IN 46507
Operating Permit No.: 7039-40049-00807
Minor Source Modification No.: 039-43532-00807
Minor Permit Modification No.: 039-43547-00807
Reviewer: Alexandrea Neuzerling

<table>
<thead>
<tr>
<th>Material</th>
<th>Density (Lb/Gal)</th>
<th>Weight % Vinyl (HDI &amp; Organics)</th>
<th>Weight % Water</th>
<th>Weight % Organics</th>
<th>Volume % Non-Volatiles (solids%)</th>
<th>Gal of Mat. (gal/unit)</th>
<th>Maximum (units/hr)</th>
<th>Pounds VOC per gallon of coating less water</th>
<th>Pounds VOC per gallon of coating per hour</th>
<th>Potential VOC pounds per day</th>
<th>Potential VOC tons per year</th>
<th>Particulate Potential (ton/yr)</th>
<th>lb VOC/gal solids</th>
<th>Transfer Efficiency</th>
</tr>
</thead>
<tbody>
<tr>
<td>Polyurethane Sealant</td>
<td>9.76</td>
<td>6.00%</td>
<td>0.00%</td>
<td>6.00%</td>
<td>95.00%</td>
<td>0.400</td>
<td>1.750</td>
<td>0.59</td>
<td>0.59</td>
<td>0.41</td>
<td>9.84</td>
<td>1.80</td>
<td>0.00</td>
<td>0.62</td>
</tr>
</tbody>
</table>

Source uses acetone, but this is not counted towards VOC and HAP emissions since it is neither VOC or HAP.

Total Potential to Emit = Add worst case coating to all solvents

**METHODOLOGY**

Potential VOC Pounds per Hour = Density (lb/gal) * Weight % Organics / (1-Volume % water)
Potential VOC Pounds per Day = Density (lb/gal) * Weight % Organics / (1-Volume % water) * 24 hours/day
Potential VOC Tons per Year = Density (lb/gal) * Weight % Organics / (1-Volume % water) * 8760 hours/year
Particulate Potential Tons per Year = Density (lb/gal) * Weight % Organics / (1-Volume % water) * 8760 hours/year

Potential to Emit (tons/year) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * % Weight HAP * 8760 hours/ 1 year * 1ton/2000 lbs

HAPs

Methodology

Potential to Emit (tons/year) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * % Weight HAP * 8760 hours/ 1 year * 1ton/2000 lbs
### Methodology

**Pounds of VOC per Gallon Coating less Water** = \( \frac{\text{Density (lb/gal)} \times \text{Weight % Organics}}{1 - \text{Volume % Water}} \)

**Pounds of VOC per Gallon Coating** = \( \frac{\text{Density (lb/gal)} \times \text{Weight % Organics}}{1} \)

**Potential VOC Pounds per Hour** = \( \text{Pounds of VOC per Gallon coating (lb/gal)} \times \text{Gal of Material (gal/unit)} \times \text{Maximum (units/hr)} \)

**Potential VOC Pounds per Day** = \( \text{Pounds of VOC per Gallon coating (lb/gal)} \times \text{Gal of Material (gal/unit)} \times \text{Maximum (units/hr)} \times (24 \text{ hr/day}) \)

**Potential VOC Tons per Year** = \( \text{Pounds of VOC per Gallon coating (lb/gal)} \times \text{Gal of Material (gal/unit)} \times \text{Maximum (units/hr)} \times (8760 \text{ hr/yr}) \times (1 \text{ ton/2000 lbs}) \)

**Particulate Potential Tons per Year** = \( \text{Maximum (units/hr)} \times \text{Gal of Material (gal/unit)} \times (1- \text{Weight % Volatiles}) \times (1- \text{Transfer efficiency}) \times (8760 \text{ hrs/yr}) \times (1 \text{ ton/2000 lbs}) \)

**Pounds VOC per Gallon of Solids** = \( \frac{\text{Density (lbs/gal)} \times \text{Weight % organics}}{\text{Volume % solids}} \)

**Total = Worst Coating + Sum of all solvents used**

---

### Material Density | Weight % Volatile (H2O & Organics) | Weight % Water | Weight % Organics | Volume % Non-volatiles (solids) | Gal of Mat. (gallons/unit) | Maximum (units/hr) | Pounds VOC per gallon of coating less water | Pounds VOC per gallon of coating | Potential VOC pounds per hour | Potential VOC pounds per day | Potential VOC tons per year | Particulate Potential (tons/yr) | % VOC/gal solids | Transfer Efficiency | Substrate
---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---
Isopropyl alcohol | 6.55 | 2.500 | 1.750 | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | Metal - Pontoon
Metal Jacket | 7.92 | 0.250 | 1.750 | 0.00% | 0.00% | 0.00% | 0.00% | 5.00% | 0.00 | 0.00 | 0.00 | 0.76 | 0.00 | 0.00 | 100% | Metal - Pontoon

---

**MDI** = P, P'-Methylenebis(phenyl isocyanate)

**Methodology**

**Potential to Emit (tons/year)** = \( \text{Density (lb/gal)} \times \text{Gal of Mat. (gal/unit)} \times \text{Maximum (units/hr)} \times \% \text{Weight HAP} \times 8760 \text{ hrs/yr} \times 1 \text{ year} \times \frac{1}{2000 \text{ lbs/ton}} \)

---

Source also uses acetone, but this is not counted towards VOC and HAP emissions since it is neither VOC or HAP.
Appendix A: Emissions Calculations
VOC and Particulate
From Plant 2 Final Finish Surface Coating Operations

Company Name: Barletta Boat Company
Source Address: 51687 County Road 133, Bristol, IN 46507
Operating Permit No.: T039-40048-00007
Minor Source Modification No.: 039-43532-00007
Minor Permit Modification No.: 039-43547-00007
Reviewer: Alexandrea Neuzerling

<table>
<thead>
<tr>
<th>Material</th>
<th>Density (Lb/Gal)</th>
<th>Weight % Volatile (H2O &amp; Organics)</th>
<th>Weight % Water</th>
<th>Weight % Organics</th>
<th>Volume % Non-Volatiles (solids)</th>
<th>Volume % Organics</th>
<th>Gal of Mat. (gal/unit)</th>
<th>Maximum (unit/hour)</th>
<th>Pounds VOC per gallon of coating less water</th>
<th>Pounds VOC per gallon of coating</th>
<th>Potential VOC pounds per hour</th>
<th>Potential VOC pounds per day</th>
<th>Potential VOC tons per year</th>
<th>Particulate Potential (ton/yr)</th>
<th>lbs VOC/gal solids</th>
<th>Transfer Efficiency</th>
<th>Substrate</th>
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<tbody>
<tr>
<td>Starberry Cleaner</td>
<td>6.54</td>
<td>100.00%</td>
<td>0.00%</td>
<td>100.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.030</td>
<td>1.750</td>
<td>6.54</td>
<td>6.54</td>
<td>0.34</td>
<td>8.24</td>
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<td>DIV/0!</td>
<td>100%</td>
<td>Metal, Plastic</td>
</tr>
<tr>
<td>Formula 409</td>
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<td>50.00%</td>
<td>0.00%</td>
<td>50.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.030</td>
<td>1.750</td>
<td>4.17</td>
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<td>5.23</td>
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<td>100%</td>
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<td>Isopropyl Alcohol</td>
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<td>100.00%</td>
<td>0.00%</td>
<td>100.00%</td>
<td>0.00%</td>
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<td>6.55</td>
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<td>0.030</td>
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<td>100%</td>
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<td>100.00%</td>
<td>0.00%</td>
<td>100.00%</td>
<td>0.00%</td>
<td>0.00%</td>
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<td>6.23</td>
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<td>0.00%</td>
<td>100.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.030</td>
<td>1.750</td>
<td>6.54</td>
<td>6.54</td>
<td>0.34</td>
<td>8.24</td>
<td>1.50</td>
<td>0.00</td>
<td>DIV/0!</td>
<td>100%</td>
<td>Metal, Plastic</td>
</tr>
</tbody>
</table>

The material is applied via roll, flow, or brush.

Source also uses acetone, but this is not counted towards VOC and HAP emissions since it is neither VOC or HAP.

The material listed above does not contain any HAPs per the SDS.

Total Potential to Emit\n  Add worst case coating to all solvents\n  \n  2.47 | 59.26 | 10.81 | 0.00

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)

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

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

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)

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

Total VOC per Gallon of Solids = (Density (lb/gal) * Weight % organics) / (Volume % solids)

Total = Worst Coating + Sum of all solvents used

surcoat.xls 9/95
### Appendix A: Emissions Calculations

**VOC and Particulate**

**From Plant 2 Carpet Adhesive Surface Coating Operations**

**Company Name:** Barletta Boat Company  
**Source Address:** 51687 County Road 133, Bristol, IN 46507  
**Operating Permit No.:** T039-40048-00807  
**Minor Source Modification No.:** 039-43532-00807  
**Minor Permit Modification No.:** 039-43547-00807  
**Reviewer:** Alexandrea Neuzerling

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#### Material Density (Lb/Gal) Weight % Volatile (H2O & Organics) Weight % Organics Volume % Water Volume % Non-Volatiles (solids) Gal of Mat. (gal/unit) Maximum (unit/hour) Pounds VOC per gallon of coating less water Pounds VOC per gallon of coating Potential VOC pounds per hour Potential VOC pounds per day Potential VOC tons per year Particulate Potential (ton/yr) lb VOC/gal solids Transfer Efficiency Substrate

<table>
<thead>
<tr>
<th>Material</th>
<th>Density (Lb/Gal)</th>
<th>Weight % Volatile (H2O &amp; Organics)</th>
<th>Weight % Organics</th>
<th>Volume % Water</th>
<th>Volume % Non-Volatiles (solids)</th>
<th>Gal of Mat. (gal/unit)</th>
<th>Maximum (unit/hour)</th>
<th>Pounds VOC per gallon of coating less water</th>
<th>Pounds VOC per gallon of coating</th>
<th>Potential VOC pounds per hour</th>
<th>Potential VOC pounds per day</th>
<th>Potential VOC tons per year</th>
<th>Particulate Potential (ton/yr)</th>
<th>lb VOC/gal solids</th>
<th>Transfer Efficiency</th>
<th>Substrate</th>
</tr>
</thead>
<tbody>
<tr>
<td>8011 Acrylic waterbased (Floor Adhesive)</td>
<td>8.35</td>
<td>44.00%</td>
<td>44.00%</td>
<td>55.00%</td>
<td>1.15</td>
<td>3.51</td>
<td>0.64</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>100%</td>
<td>Wood and Felt (Vinyl)</td>
<td></td>
</tr>
</tbody>
</table>

The material is applied via roll, flow, or brush. Source also uses acetone, but this is not counted towards VOC and HAP emissions since it is neither VOC or HAP. *Floor Adhesive does not contain HAPs.*

#### METHODOLOGY

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

Total Potential to Emit = Worst Case Coating + Sum of all solvents used

surcoat.xls 9/95
## Appendix A: Emissions Calculations

### Plant 2 Welding

**Company Name:** Barletta Boat Company  
**Source Address:** 51687 County Road 133, Bristol, IN 46507  
**Operating Permit No.:** T039-40049-00807  
**Minor Source Modification No.:** 039-43532-00807  
**Minor Permit Modification No.:** 039-43547-00807  
**Reviewer:** Alexandrea Neuzerling

### PROCESS EMISSIONS

<table>
<thead>
<tr>
<th>PROCESS</th>
<th>Number of Stations</th>
<th>Max. electrode consumption per station (lbs/hr)</th>
<th>EMISSION FACTORS* (lb pollutant/lb electrode)</th>
<th>EMISSIONS (lbs/hr)</th>
<th>HAPS (lbs/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td>PM = PM10</td>
<td>Mn</td>
<td>Ni</td>
</tr>
<tr>
<td>Submerged Arc</td>
<td>0</td>
<td></td>
<td>0.036</td>
<td>0.011</td>
<td>0.000</td>
</tr>
<tr>
<td>Metal Inert Gas (MIG)(carbon steel)</td>
<td>75</td>
<td>1</td>
<td>0.0055</td>
<td>0.0005</td>
<td>0.413</td>
</tr>
<tr>
<td>Stick (E7018 electrode)</td>
<td>0</td>
<td></td>
<td>0.0211</td>
<td>0.009</td>
<td>0.000</td>
</tr>
<tr>
<td>Tungsten Inert Gas (TIG)(carbon steel)</td>
<td>0</td>
<td></td>
<td>0.0055</td>
<td>0.0005</td>
<td>0.000</td>
</tr>
<tr>
<td>Oxyacetylene(carbon steel)</td>
<td>0</td>
<td></td>
<td>0.0055</td>
<td>0.0005</td>
<td>0.000</td>
</tr>
</tbody>
</table>

### EMISION TOTALS

- Potential Emissions lbs/hr: 0.41  
- Potential Emissions lbs/day: 9.90  
- Potential Emissions tons/year: 1.81

**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 being reported is:**

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.) = 0.039 lb/1,000 in. cut, 8 mm thick

Plasma cutting emissions, lb/hr: (# of stations)(max. metal thickness, in.)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 8 mm thick)

Cutting emissions, lb/hr: (# of stations)(max. metal thickness, in.)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 1" thick)

Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used)

Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day

Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/year x 1 ton/2,000 lbs
Appendix A: Emissions Calculations
Particulate
From Plant 2 Aluminum Cutting

Company Name: Barletta Boat Company
Source Address: 51687 County Road 133, Bristol, IN 46507
Operating Permit No.: T039-40049-00807
Minor Source Modification No.: 039-43532-00807
Minor Permit Modification No.: 039-43547-00807
Reviewer: Alexandrea Neuzerling

<table>
<thead>
<tr>
<th>Control Device ID</th>
<th>Control Device</th>
<th>Maximum Throughput (ton/hr)</th>
<th>PM/PM10/PM2.5 Emission Factor (lb/ton)*</th>
<th>Control Efficiency %</th>
<th>Controlled Potential to Emit PM/PM10/PM2.5 (lb/hr)</th>
<th>Uncontrolled Potential to Emit PM/PM10/PM2.5 (lb/hr)</th>
<th>Controlled Potential to Emit PM/PM10/PM2.5 (ton/year)</th>
<th>Uncontrolled Potential to Emit PM/PM10/PM2.5 (ton/year)</th>
</tr>
</thead>
<tbody>
<tr>
<td>*AlCutting 3</td>
<td>Baghouse</td>
<td>0.0425</td>
<td>0.35</td>
<td>95%</td>
<td>0.006</td>
<td>0.027</td>
<td>0.12</td>
<td>0.53</td>
</tr>
<tr>
<td>INBH1/UCS1</td>
<td>Baghouse</td>
<td>0.0425</td>
<td>0.35</td>
<td>95%</td>
<td>0.006</td>
<td>0.027</td>
<td>0.12</td>
<td>0.53</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td><strong>0.012</strong></td>
<td><strong>0.053</strong></td>
<td><strong>0.243</strong></td>
<td><strong>1.064</strong></td>
</tr>
</tbody>
</table>

*BC1 is a bit cutter & UCS1 is a double upcut saw

Methodology:
*PM/PM10/PM2.5 Emission factor from U.S. EPA FIRE Version 5.0 SCC 30700802 Log Sawing
Maximum Throughput (ton/hr) = 85 lb/hr * 1 ton/2000 lbs
Uncontrolled PTE of PM/PM10/PM2.5 (lbs/hr) = Maximum Throughput (ton/hr) * PM/PM10/PM2.5 Emission Factor (lb/ton)
Uncontrolled PTE of PM/PM10/PM2.5 (ton/yr) = Uncontrolled PTE PM/PM10/PM2.5 (lb/hr) * 8760 hr/1 yr * 2000 lb/1 ton
Controlled PTE of PM/PM10/PM2.5 (lbs/hr) = Uncontrolled PTE PM/PM10/PM2.5 (lb/hr) * (1 - 0.95)
Controlled PTE of PM/PM10/PM2.5 (ton/yr) = Uncontrolled PTE PM/PM10/PM2.5 (ton/yr) * (1 - 0.95)
## Appendix A: Emissions Calculations
### Natural Gas Combustion Only

**MM BTU/HR <100**

**Company Name:** Barletta Boat Company  
**Address:** 51687 County Road 133, Bristol, IN 46507  
**Operating Permit No.:** T039-40049-00807  
**Minor Source Modification No.:** 039-43532-00807  
**Minor Permit Modification No.:** 039-43547-00807  
**Reviewer:** Alexandrea Neuzerling

<table>
<thead>
<tr>
<th>Emission Unit/ID</th>
<th>No. of Units</th>
<th>Unit</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Thermo Cyclers (TCH1 - TCH4)</td>
<td>4</td>
<td>0.72</td>
<td>2.88</td>
</tr>
<tr>
<td>Office/breakroom Heater (OH1)</td>
<td>1</td>
<td>1.10</td>
<td>1.10</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>5</strong></td>
<td></td>
<td><strong>3.98</strong></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>PM*</th>
<th>PM10*</th>
<th>direct PM2.5*</th>
<th>SO2</th>
<th>NOx</th>
<th>VOC</th>
<th>CO</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emission Factor in lb/MMCF</td>
<td>1.9</td>
<td>7.6</td>
<td>7.6</td>
<td>0.6</td>
<td>100</td>
<td>5.5</td>
<td>84</td>
</tr>
<tr>
<td>Potential Emission in tons/yr</td>
<td>0.03</td>
<td>0.13</td>
<td>0.13</td>
<td>0.01</td>
<td>1.71</td>
<td>0.09</td>
<td>1.44</td>
</tr>
</tbody>
</table>

*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)

<table>
<thead>
<tr>
<th>HAPs - Organics</th>
<th>Benzene</th>
<th>Dichlorobenzene</th>
<th>Formaldehyde</th>
<th>Hexane</th>
<th>Toluene</th>
<th>Total - Organics</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emission Factor in lb/MMCF</td>
<td>2.1E-03</td>
<td>1.2E-03</td>
<td>7.5E-02</td>
<td>1.8E+00</td>
<td>3.4E-03</td>
<td></td>
</tr>
<tr>
<td>Potential Emission in tons/yr</td>
<td>3.6E-05</td>
<td>2.1E-05</td>
<td>1.3E-03</td>
<td>0.03</td>
<td>5.8E-05</td>
<td><strong>0.03</strong></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>HAPs - Metals</th>
<th>Lead</th>
<th>Cadmium</th>
<th>Chromium</th>
<th>Manganese</th>
<th>Nickel</th>
<th>Total - Metals</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emission Factor in lb/MMCF</td>
<td>5.0E-04</td>
<td>1.1E-03</td>
<td>1.4E-03</td>
<td>3.8E-04</td>
<td>2.1E-03</td>
<td></td>
</tr>
<tr>
<td>Potential Emission in tons/yr</td>
<td>6.5E-06</td>
<td>1.9E-05</td>
<td>2.4E-05</td>
<td>6.5E-06</td>
<td>3.6E-05</td>
<td><strong>9.4E-05</strong></td>
</tr>
</tbody>
</table>

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
Fugitive Dust Emissions - Plant 2 Paved Roads

Company Name: Barletta Boat Company
Source Address: 5187 County Road 133, Bristol, IN 46507
Operating Permit No.: T039-40049-00807
Minor Source Modification No.: 039-43532-00807
Minor Permit Modification No.: 039-43547-00807
Reviewer: Alexandrea Neuzerling

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 Information (provided by source)

<table>
<thead>
<tr>
<th>Type</th>
<th>Maximum number of vehicles per day</th>
<th>Number of one-way trips per day per vehicle</th>
<th>Maximum trips per day (trip/day)</th>
<th>Maximum Weight Loaded (tons/trip)</th>
<th>Total Weight driven per day (ton/day)</th>
<th>Maximum one-way distance (feet/trip)</th>
<th>Maximum one-way distance (mi/trip)</th>
<th>Maximum one-way miles (miles/day)</th>
<th>Maximum one-way miles (miles/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Vehicle (entering plant) (one-way trip)</td>
<td>50.0</td>
<td>1.0</td>
<td>50.0</td>
<td>1.0</td>
<td>50.0</td>
<td>500</td>
<td>0.095</td>
<td>4.7</td>
<td>1728.2</td>
</tr>
<tr>
<td>Vehicle (leaving plant) (one-way trip)</td>
<td>50.0</td>
<td>1.0</td>
<td>50.0</td>
<td>1.0</td>
<td>50.0</td>
<td>500</td>
<td>0.095</td>
<td>4.7</td>
<td>1728.2</td>
</tr>
<tr>
<td>Totals</td>
<td>100.0</td>
<td>100.0</td>
<td>9.5</td>
<td>3456.4</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Average Vehicle Weight Per Trip = 1.0 tons/trip
Average Miles Per Trip = 0.09 miles/trip

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

<table>
<thead>
<tr>
<th>PM</th>
<th>PM10</th>
<th>PM2.5</th>
</tr>
</thead>
<tbody>
<tr>
<td>0.011</td>
<td>0.0022</td>
<td>0.00054</td>
</tr>
</tbody>
</table>

where $k = 0.011$ $0.0022$ $0.00054$ lb/VMT = particle size multiplier (AP-42 Table 13.2.1-1)
$W = 1.0$ $1.0$ $1.0$ tons = average vehicle weight (provided by source)
$sL = 9.7$ $9.7$ $9.7$ 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, $\text{Eext} = \text{Ef} \times [1 - (\frac{p}{4N})]$ (Equation 2 from AP-42 13.2.1)

<table>
<thead>
<tr>
<th>PM</th>
<th>PM10</th>
<th>PM2.5</th>
</tr>
</thead>
<tbody>
<tr>
<td>0.067</td>
<td>0.017</td>
<td>0.0043</td>
</tr>
</tbody>
</table>

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

Mitigated Emission Factor, $\text{Eext} = \frac{\text{Ef} \times [1 - (\frac{p}{4N})]}{\text{Ef} \times [1 - (\frac{p}{4N})]}$ (Equation 2 from AP-42 13.2.1)

<table>
<thead>
<tr>
<th>PM</th>
<th>PM10</th>
<th>PM2.5</th>
</tr>
</thead>
<tbody>
<tr>
<td>0.060</td>
<td>0.016</td>
<td>0.0039</td>
</tr>
</tbody>
</table>

Process

<table>
<thead>
<tr>
<th>Mitigated PTE of PM (tons/yr)</th>
<th>Mitigated PTE of PM10 (tons/yr)</th>
<th>Mitigated PTE of PM2.5 (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Vehicle (entering plant) (one-way trip)</td>
<td>0.07</td>
<td>0.01</td>
</tr>
<tr>
<td>Vehicle (leaving plant) (one-way trip)</td>
<td>0.07</td>
<td>0.01</td>
</tr>
<tr>
<td>Totals</td>
<td>0.14</td>
<td>0.03</td>
</tr>
</tbody>
</table>

Methodology

<table>
<thead>
<tr>
<th>Total Weight driven per day (ton/day)</th>
<th>= [Maximum Weight Loaded (tons/trip)] * [Maximum trips per day (trip/day)]</th>
</tr>
</thead>
<tbody>
<tr>
<td>Maximum one-way distance (mi/trip)</td>
<td>= [Maximum one-way distance (feet/trip)] / [5280 ft/mile]</td>
</tr>
<tr>
<td>Maximum one-way miles (miles/day)</td>
<td>= [Maximum trips per year (trip/day)] * [Maximum one-way distance (mi/trip)]</td>
</tr>
<tr>
<td>Average Vehicle Weight Per Trip (ton/trip)</td>
<td>= SUM[Total Weight driven per day (ton/day)] / SUM[Maximum trips per day (trip/day)]</td>
</tr>
<tr>
<td>Average Miles Per Trip (miles/trip)</td>
<td>= SUM[Maximum one-way miles (miles/day)] / SUM[Maximum trips per year (trip/day)]</td>
</tr>
<tr>
<td>Mitigated PTE (tons/yr)</td>
<td>= [Maximum one-way miles (miles/yr)] * [Mitigated Emission Factor (lb/mile)] * (ton/2000 lbs)</td>
</tr>
</tbody>
</table>

Abbreviations

PM = Particulate Matter
PM10 = Particulate Matter (<10 um)
PM2.5 = Particulate Matter (<2.5 um)
PTE = Potential to Emit
### Appendix A: Emission Calculations

#### Fugitive Dust Emissions - Plant 1 Unpaved Roads

**Company Name:** Barletta Boat Company  
**Source Address:** 51687 County Road 133, Bristol, IN 46507  
**Operating Permit No.:** T039-40049-00807  
**Minor Source Modification No.:** 039-43532-00807  
**Minor Permit Modification No.:** 039-43547-00807  
**Reviewer:** Alexandrea Neuzerling

**Unpaved Roads at Industrial Site**
The following calculations determine the amount of emissions created by unpaved roads, based on 8,760 hours of use and AP-42, Ch 13.2.2 (11/2006).

#### Vehicle Information (provided by source)

<table>
<thead>
<tr>
<th>Type</th>
<th>Maximum number of vehicles</th>
<th>Number of one-way trips per day per vehicle</th>
<th>Maximum trips per day (trip/day)</th>
<th>Maximum Weight of Loaded Vehicle (tons/trip)</th>
<th>Total Weight driven per day (ton/day)</th>
<th>Maximum one-way distance (feet/trip)</th>
<th>Maximum one-way distance (mi/trip)</th>
<th>Maximum one-way miles (miles/day)</th>
<th>Maximum one-way miles (miles/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Vehicle (entering plant) (one-way trip)</td>
<td>10.0</td>
<td>1.0</td>
<td>10.0</td>
<td>10.0</td>
<td>10.0</td>
<td>800</td>
<td>0.152</td>
<td>0.152</td>
<td>1.5</td>
</tr>
<tr>
<td>Vehicle (leaving plant) (one-way trip)</td>
<td>10.0</td>
<td>1.0</td>
<td>10.0</td>
<td>3.0</td>
<td>30.0</td>
<td>800</td>
<td>0.152</td>
<td>0.152</td>
<td>1.5</td>
</tr>
<tr>
<td>Vehicle (entering plant) (one-way trip)</td>
<td>15.0</td>
<td>1.0</td>
<td>15.0</td>
<td>1.0</td>
<td>15.0</td>
<td>1000</td>
<td>0.189</td>
<td>0.189</td>
<td>2.8</td>
</tr>
<tr>
<td>Vehicle (leaving plant) (one-way trip)</td>
<td>15.0</td>
<td>1.0</td>
<td>15.0</td>
<td>2.0</td>
<td>30.0</td>
<td>1000</td>
<td>0.189</td>
<td>0.189</td>
<td>2.8</td>
</tr>
</tbody>
</table>

**Totals**

- 50.0
- 175.0
- 8.7
- 3179.9

#### Average Vehicle Weight Per Trip

- **3.5 tons/trip**

#### Average Miles Per Trip

- **0.17 miles/trip**

#### Unmitigated Emission Factor, \( Ef \)

\[
Ef = k \times (s/12)^a \times (W/3)^b
\]

where:
- \( k = 4.9 \) (lb/mi) = particle size multiplier (AP-42 Table 13.2.2-2 for Industrial Roads)
- \( s = 6.0 \) % = mean % silt content of unpaved roads (AP-42 Table 13.2.2-1 Iron and Steel Production)
- \( a = 0.7 \) = constant (AP-42 Table 13.2.2-2 for Industrial Roads)
- \( W = 3.5 \) tons = average vehicle weight
- \( b = 0.45 \) = constant (AP-42 Table 13.2.2-2 for Industrial Roads)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, \( E_{ext} \)

\[
E_{ext} = E \times \frac{(365 - P)}{365}
\]

where \( P = 125 \) days of rain greater than or equal to 0.01 inches (see Fig. 13.2.2-1)

#### Mitigated Emission Factor, \( E_{ext} \)

- **PM:** 3.23  
- **PM10:** 0.86  
- **PM2.5:** 0.09  

#### Mitigated Emission Factor, \( E_{ext} \)

- **PM:** 2.13  
- **PM10:** 0.57  
- **PM2.5:** 0.06  

#### Process

<table>
<thead>
<tr>
<th></th>
<th>Mitigated PTE of PM (tons/yr)</th>
<th>Mitigated PTE of PM10 (tons/yr)</th>
<th>Mitigated PTE of PM2.5 (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Vehicle (entering plant) (one-way trip)</td>
<td>0.59</td>
<td>0.16</td>
<td>0.02</td>
</tr>
<tr>
<td>Vehicle (leaving plant) (one-way trip)</td>
<td>0.59</td>
<td>0.16</td>
<td>0.02</td>
</tr>
<tr>
<td>Vehicle (entering plant) (one-way trip)</td>
<td>1.10</td>
<td>0.29</td>
<td>0.03</td>
</tr>
<tr>
<td>Vehicle (leaving plant) (one-way trip)</td>
<td>1.10</td>
<td>0.29</td>
<td>0.03</td>
</tr>
</tbody>
</table>

**Totals**

- **3.38**  
- **0.90**  
- **0.09**

#### Methodology

- **Total Weight driven per day (ton/day)** = [Maximum Weight of Loaded Vehicle (tons/trip)] * [Maximum trips per day (trip/day)]
- **PM = Particulate Matter**  
- **PM10 = Particulate Matter (<10 um)**  
- **PM2.5 = Particulate Matter (<2.5 um)**
- **Maximum one-way distance (miles/yr)** = [Maximum trips per year (trip/day)] * [Maximum one-way distance (mi/trip)]
- **PTE = Potential to Emit**
- **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))
- **Mitigated PTE (tons/yr)** = ([Maximum one-way miles (miles/yr)] * [Mitigated Emission Factor (lb/mile)]) / (ton/2000 lbs)

#### Abbreviations

- **PM:** Particulate Matter  
- **PM10:** Particulate Matter (<10 um)  
- **PM2.5:** Particulate Matter (<2.5 um)  
- **PTE:** Potential to Emit
## Appendix A: Emissions Calculations
### VOC and Particulate
#### From Assembly Line 1 and Line 2

**Company Name:** Barletta Boat Company  
**Source Address:** 51687 County Road 133, Bristol, IN 46507  
**Operating Permit No.:** 1093-40049-00807  
**Minor Source Modification No.:** 039-43532-00807  
**Minor Permit Modification No.:** 039-43547-00807  
**Reviewer:** Alexandrea Neuzerling

### Material Density

<table>
<thead>
<tr>
<th>Material</th>
<th>Density (Lb/Gal)</th>
<th>Weight % Volatile (HAP &amp; Organics)</th>
<th>Weight % Water</th>
<th>Weight % Organics</th>
<th>Volume % Non-Volatiles (solids)</th>
<th>Gal of Mat. (gal/unit)</th>
<th>Maximum (unit/hour)</th>
<th>Pounds VOC per gallon of coating less water</th>
<th>Pounds VOC per gallon of coating</th>
<th>Potential VOC pounds per hour</th>
<th>Potential VOC tons per day</th>
<th>Potential VOC tons per year</th>
<th>Particulate Potential (ton/yr)</th>
<th>lb VOC/gal solids</th>
<th>Transfer Efficiency</th>
<th>Substrate</th>
</tr>
</thead>
<tbody>
<tr>
<td>Polyurethane Sealant</td>
<td>9.76</td>
<td>6.00%</td>
<td>0.00%</td>
<td>6.00%</td>
<td>94.00%</td>
<td>0.400</td>
<td>3.580</td>
<td>0.59</td>
<td>0.59</td>
<td>0.82</td>
<td>19.67</td>
<td>3.59</td>
<td>0.00</td>
<td>0.62</td>
<td>100%</td>
<td>Metal and Wood</td>
</tr>
</tbody>
</table>

The material is applied via roll, flow, or brush. Source also uses acetone, but this is not counted towards VOC and HAP emissions since it is neither VOC or HAP.

#### Total Potential to Emit

| Add worst case coating to all solvents | 0.82 | 19.67 | 3.59 | 0.00 |

### METHODOLOGY

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

### HAPs

<table>
<thead>
<tr>
<th>Material</th>
<th>Density</th>
<th>Gal of Mat. (gal/unit)</th>
<th>Maximum (unit/hour)</th>
<th>% Weight Vinyl Acetate</th>
<th>% Weight Xylene</th>
<th>% Weight Ethylbenzene</th>
<th>% Weight MDI</th>
<th>% Methanol</th>
<th>Potential to Emit (tons/year)</th>
</tr>
</thead>
</table>
| Polyurethane Sealant   | 9.76    | 0.400                  | 3.50%               | 0.00%                  | 6.00%          | 2.00%                 | 0.00         | 3.59      | 1.20                          

\(\text{MDI} = P, P'- \text{Methylenebis(phenyl isocyanate)}\)

**Methodology**

- **Potential to Emit (tons/year)** = \(\text{Density (lb/gal)} \times\) **Gal of Mat. (gal/unit)** \(\times\) **Maximum (unit/hour)** \(\times\) % Weight HAP \(\times\) 8760 hours/1 year \(\times\) 1ton/2000lbs

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Appendix A: Emissions Calculations

VOC and Particulate
From Surface Coating Operations

Company Name: Barletta Boat Company
Source Address: 51687 County Road 133, Bristol, IN 46507
Operating Permit No.: T039-40049-00807
Minor Source Modification No.: 039-43532-00807
Minor Permit Modification No.: 039-43547-00807
Reviewer: Alexandrea Neuzerling

Material Density (Lb/Gal) Weight % (Volatile H2O & Organics) Weight % Water Weight % Organics Volume % Non-volatiles (solids) Gal of Mat (gal/unit) Maximum (units/hour) Pounds VOC per gallon of coating less water Pounds VOC per gallon of coating Potential VOC pounds per day Potential VOC tons per year Particulate Potential (ton/yr) VOC/ gal solids Transfer Efficiency Substrate

<table>
<thead>
<tr>
<th>Material</th>
<th>Density (Lb/Gal)</th>
<th>Weight % (Volatile H2O &amp; Organics)</th>
<th>Weight % Water</th>
<th>Weight % Organics</th>
<th>Volume % Non-volatiles (solids)</th>
<th>Gal of Mat (gal/unit)</th>
<th>Maximum (units/hour)</th>
<th>Pounds VOC per gallon of coating less water</th>
<th>Pounds VOC per gallon of coating</th>
<th>Potential VOC pounds per day</th>
<th>Potential VOC tons per year</th>
<th>Particulate Potential (ton/yr)</th>
<th>VOC/ gal solids</th>
<th>Transfer Efficiency</th>
<th>Substrate</th>
</tr>
</thead>
<tbody>
<tr>
<td>Isopropyl alcohol</td>
<td>6.55</td>
<td>2.00%</td>
<td>0.00%</td>
<td>98.00%</td>
<td>0.00%</td>
<td>0.250</td>
<td>0.00%</td>
<td>3.33</td>
<td>0.14</td>
<td>0.16</td>
<td>0.16</td>
<td>0.00</td>
<td>0.00</td>
<td>100%</td>
<td>Metal - Pontoon</td>
</tr>
<tr>
<td>Metal jacket</td>
<td>7.92</td>
<td>2.00%</td>
<td>0.00%</td>
<td>98.00%</td>
<td>0.00%</td>
<td>0.250</td>
<td>0.00%</td>
<td>0.16</td>
<td>0.16</td>
<td>0.14</td>
<td>0.14</td>
<td>0.00</td>
<td>0.00</td>
<td>100%</td>
<td>Metal - Pontoon</td>
</tr>
</tbody>
</table>

The material is applied via roll, flow, or brush.

Source also uses acetone, but this is not counted towards VOC and HAP emissions since it is neither VOC or HAP.

Total Potential to Emit

Add worst case coating to all solvents 1.58 37.98 6.93 0.00

METHODOLOGY

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hrs/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hrs/yr) * (1 ton/2000 lbs)

Potential to Emit (tons/year) = Density (Lb/Gal) * Gal of Mat. (gal/unit) * Maximum (units/hour) * % Weight HAP * 8760 hours/ 1 year * 1ton/2000lbs

HAPs

Material Density Gal of Mat. Maximum % Weight Vinyl Acetate % Weight Xylenes % Weight Methanol Potential to Emit (tons/year)

<table>
<thead>
<tr>
<th>Material</th>
<th>Density (Lb/Gal)</th>
<th>Gal of Mat. (gal/unit)</th>
<th>Maximum (units/hour)</th>
<th>% Weight Vinyl Acetate</th>
<th>% Weight Xylenes</th>
<th>% Weight Methanol</th>
<th>Potential to Emit (tons/year)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Isopropyl alcohol</td>
<td>6.55</td>
<td>2.500</td>
<td>3.500</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00</td>
</tr>
<tr>
<td>Metal jacket</td>
<td>7.92</td>
<td>0.250</td>
<td>3.500</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.25</td>
</tr>
</tbody>
</table>

MH = P, P'-Methylenedianiline (phenyl isocyanate)

Potential to Emit (tons/year) = Density (Lb/Gal) * Gal of Mat. (gal/unit) * Maximum (units/hour) * % Weight HAP * 8760 hours/ 1 year * 1ton/2000lbs

Methodology

Potential to Emit (tons/year) = Density (Lb/Gal) * Gal of Mat. (gal/unit) * Maximum (units/hour) * % Weight HAP * 8760 hours/ 1 year * 1ton/2000lbs

<table>
<thead>
<tr>
<th>Material</th>
<th>Density (Lb/Gal)</th>
<th>Gal of Mat. (gal/unit)</th>
<th>Maximum (units/hour)</th>
<th>% Weight Vinyl Acetate</th>
<th>% Weight Xylenes</th>
<th>% Weight Methanol</th>
<th>Potential to Emit (tons/year)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Isopropyl alcohol</td>
<td>6.55</td>
<td>2.500</td>
<td>3.500</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00</td>
</tr>
<tr>
<td>Metal jacket</td>
<td>7.92</td>
<td>0.250</td>
<td>3.500</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.25</td>
</tr>
</tbody>
</table>

MH = P, P'-Methylenedianiline (phenyl isocyanate)
## Appendix A: Emissions Calculations
### VOC and Particulate
From Surface Coating Operations

**Company Name:** Barletta Boat Company  
**Source Address:** 51687 County Road 133, Bristol, IN 46507  
**Operating Permit No.:** T039-40048-00807  
**Minor Source Modification No.:** 039-43532-00807  
**Minor Permit Modification No.:** 039-43547-00807  
**Reviewer:** Alexandrea Neuzerling

<table>
<thead>
<tr>
<th>Material</th>
<th>Density (Lb/Gal)</th>
<th>Weight % Volatile (H20 &amp; Organics)</th>
<th>Weight % Organics</th>
<th>Volume % Water</th>
<th>Volume % Non-Volatiles (solids)</th>
<th>Gal of Mat. (gal/unit)</th>
<th>Maximum (unit/hour)</th>
<th>Pounds VOC per gallon of coating less water</th>
<th>Pounds VOC per gallon of coating</th>
<th>Potential VOC pounds per hour</th>
<th>Potential VOC pounds per day</th>
<th>Potential VOC tons per year</th>
<th>Particulate Potential (ton/yr)</th>
<th>lb/VOC/gal solids</th>
<th>Transfer Efficiency</th>
<th>Substrate</th>
</tr>
</thead>
<tbody>
<tr>
<td>Bird Song Adhesives</td>
<td>9.17</td>
<td>47.00%</td>
<td>47.00%</td>
<td>0.00%</td>
<td>44.00%</td>
<td>53.00%</td>
<td>2.500</td>
<td>3.500</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>100%</td>
<td>Wood and Felt</td>
</tr>
</tbody>
</table>

The material is applied via roll, flow, or brush. Source also uses acetone, but this is not counted towards VOC and HAP emissions since it is neither VOC or HAP. Floor Adhesive does not contain HAPs.

**Total Potential to Emit**

Add worst case coating to all solvents

- 0.00
- 0.00
- 0.00
- 0.00

### METHODOLOGY

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

\[ \text{Total} = \text{Worst Coating} + \text{Sum of all solvents used} \]
### Appendix A: Emissions Calculations

#### VOC and Particulate

**From Surface Coating Operations**

**Company Name:** Barletta Boat Company  
**Source Address:** 51687 County Road 133, Bristol, IN 46507  
**Operating Permit No.:** T039-40049-00807  
**Minor Source Modification No.:** 039-43532-00807  
**Minor Permit Modification No.:** 039-43547-00807  
**Reviewer:** Alexandrea Neuzerling

| Material      | Density (Lb/Gal) | Weight % Volatile (H2O & Organics) | Weight % Water | Weight % Organics | Volume % Non-Volatiles (solids) | Volume % Water | Volume % Non-Volatiles (solids) | Gal of Mat (gal/unit) | Maximum (unit/hour) | Pounds VOC per gallon of coating less water | Pounds VOC per gallon of coating | Potential VOC pounds per hour | Potential VOC pounds per day | Potential VOC tons per year | Particulate Potential (ton/yr) | lb VOC/gal solids | Transfer Efficiency | Substrate      |
|---------------|-----------------|-----------------------------------|----------------|------------------|----------------------------------|----------------|-------------------------------|---------------------|-------------------|-------------------------------------|--------------------------|--------------------------|--------------------------|---------------------|----------------------|---------------------------|----------------------|
| Starberry Cleaner | 6.54            | 100.00%                           | 0.00%          | 100.00%          | 0.00%                             | 0.00%          | 3.500                         | 6.54                | 6.54              | 0.69                               | 16.48                    | 3.01                     | 0.00                     | #DIV/0!              | 100%                 | Metal, Plastic     |
| Formula 409    | 8.34            | 50.00%                            | 0.00%          | 50.00%           | 0.00%                             | 0.00%          | 3.500                         | 4.17                | 4.17              | 0.44                               | 10.51                    | 1.92                     | 0.00                     | #DIV/0!              | 100%                 | Metal, Plastic     |
| Isopropyl Alcohol | 6.55            | 100.00%                           | 0.00%          | 100.00%          | 0.00%                             | 0.00%          | 3.500                         | 6.55                | 6.55              | 1.83                               | 44.00                    | 8.03                     | 0.00                     | #DIV/0!              | 100%                 | Metal, Plastic     |
| SS-Shine       | 6.82            | 60.00%                            | 0.00%          | 60.00%           | 0.00%                             | 0.00%          | 3.500                         | 4.09                | 4.09              | 0.43                               | 10.92                    | 1.88                     | 0.00                     | #DIV/0!              | 100%                 | Metal, Plastic     |
| Quick VU       | 8.23            | 100.00%                           | 0.00%          | 100.00%          | 0.00%                             | 0.00%          | 3.500                         | 6.23                | 6.23              | 0.86                               | 20.74                    | 3.78                     | 0.00                     | #DIV/0!              | 100%                 | Metal, Plastic     |
| Orange Peel    | 6.54            | 100.00%                           | 0.00%          | 100.00%          | 0.00%                             | 0.00%          | 3.500                         | 6.54                | 6.54              | 0.69                               | 16.48                    | 3.01                     | 0.00                     | #DIV/0!              | 100%                 | Metal, Plastic     |

The material is applied via roll, flow, or brush.

Source also uses acetone, but this is not counted towards VOC and HAP emissions since it is neither VOC or HAP.

The material listed above does not contain any HAPs per the SDS.

**Total Potential to Emit**

Add worst case coating to all solvents

| Material | Density (Lb/Gal) | Weight % Volatile (H2O & Organics) | Weight % Water | Weight % Organics | Volume % Non-Volatiles (solids) | Volume % Water | Volume % Non-Volatiles (solids) | Gal of Mat (gal/unit) | Maximum (unit/hour) | Pounds VOC per gallon of coating less water | Pounds VOC per gallon of coating | Potential VOC pounds per hour | Potential VOC pounds per day | Potential VOC tons per year | Particulate Potential (ton/yr) | lb VOC/gal solids | Transfer Efficiency |
|----------|-----------------|-----------------------------------|----------------|------------------|----------------------------------|----------------|-------------------------------|---------------------|-------------------|-------------------------------------|--------------------------|--------------------------|--------------------------|---------------------|----------------------|--------------------------|
| Total    |                 |                                   |                |                  |                                  |                |                               |                     |                   |                                      |                          |                          |                          |                     | #DIV/0!              | 100%                 |

**METHODOLOGY**

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

---

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### Potential VOC

<table>
<thead>
<tr>
<th>Material</th>
<th>Density (Lb/Gal)</th>
<th>Weight % Styrene Monomer or VOC</th>
<th>Weight % MBA</th>
<th>CFA Unified Emission Factor: VOC (lb/ton)*</th>
<th>CFA Unified Emission Factor: MMA (lb/ton)*</th>
<th>Gal of Mat. (gal/unit)</th>
<th>Maximum (unit/hr)</th>
<th>Potential VOC (lb/hr)</th>
<th>Potential VOC (tons/yr)</th>
<th>Potential Styrene (lb/hr)</th>
<th>Potential Styrene (tons/yr)</th>
<th>Potential MMA (lb/hr)</th>
<th>Potential MMA (tons/yr)</th>
<th>Uncontrolled Potential HAP (tons/yr)</th>
<th>Transfer Efficiency*</th>
<th>Particulate Control Efficiency (%)</th>
<th>Controlled Potential Particulate (tons/yr)</th>
<th>Application Method</th>
<th>Substrate</th>
</tr>
</thead>
<tbody>
<tr>
<td>Production Gel Coat</td>
<td>10.51</td>
<td>30.00%</td>
<td>5.00%</td>
<td>342.00</td>
<td>267.00</td>
<td>75.00</td>
<td>1,000</td>
<td>3,900</td>
<td>6.29</td>
<td>150.94</td>
<td>27.55</td>
<td>21.51</td>
<td>6.04</td>
<td>27.55</td>
<td>26.19</td>
<td>75%</td>
<td>95%</td>
<td>1.41</td>
<td>Airless, as assisted containment (ACC) Gun</td>
</tr>
<tr>
<td>Tooling Gel Coat</td>
<td>7.29</td>
<td>3.99</td>
<td>27.55</td>
<td>25.41</td>
<td>6.53</td>
<td>31.95</td>
<td>28.19</td>
<td>1.57</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>1.41</td>
</tr>
<tr>
<td>Lead Free Tangerine Coating Gel Coat</td>
<td>9.54</td>
<td>40.00%</td>
<td>5.00%</td>
<td>401.00</td>
<td>356.00</td>
<td>45.00</td>
<td>15,000</td>
<td>0.035</td>
<td>1.00</td>
<td>24.11</td>
<td>4.40</td>
<td>3.91</td>
<td>0.49</td>
<td>4.40</td>
<td>3.29</td>
<td>75%</td>
<td>95%</td>
<td>0.16</td>
<td>Airless, as assisted containment (ACC) Gun</td>
</tr>
<tr>
<td>Subtotal</td>
<td></td>
<td></td>
<td></td>
<td>28.42</td>
<td>1.59</td>
<td>25.41</td>
<td>175.05</td>
<td>31.95</td>
<td>25.41</td>
<td>6.53</td>
<td>31.95</td>
<td>28.19</td>
<td>1.57</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>1.41</td>
</tr>
</tbody>
</table>

### Waste Management

<table>
<thead>
<tr>
<th>Material</th>
<th>Density (Lb/Gal)</th>
<th>Weight % Volatile (VOC) (Organics)</th>
<th>Weight % Water</th>
<th>Weight % Organics</th>
<th>Volume % Water</th>
<th>Volume % Non-Volatile (solids)</th>
<th>Gal of Mat. (gal/unit)</th>
<th>Maximum (unit/hr)</th>
<th>Pounds VOC per gallon of coating less water</th>
<th>Pounds VOC per gallon of coating</th>
<th>Potential VOC pounds per hour</th>
<th>Potential VOC pounds per day</th>
<th>Potential VOC tons per year</th>
<th>Particulate Potential (lb/hr)</th>
<th>Transfer Efficiency (%)</th>
<th>Particulate Control Efficiency (%)</th>
<th>Controlled Potential Particulate (tons/yr)</th>
<th>Application Method</th>
<th>Substrate</th>
</tr>
</thead>
<tbody>
<tr>
<td>Production Gel Coat</td>
<td>9.17</td>
<td>62.00%</td>
<td>0%</td>
<td>62%</td>
<td>0%</td>
<td>0%</td>
<td>0.015</td>
<td>3.505</td>
<td>5.69</td>
<td>5.69</td>
<td>0.30</td>
<td>7.17</td>
<td>1.31</td>
<td>0.20</td>
<td>75%</td>
<td>95%</td>
<td>0.010</td>
<td>Airless, as assisted containment (ACC) Gun</td>
<td>Fiberglass Mold</td>
</tr>
<tr>
<td>Tooling Gel Coat</td>
<td>9.17</td>
<td>62.00%</td>
<td>0.00%</td>
<td>62%</td>
<td>0%</td>
<td>0%</td>
<td>0.230</td>
<td>0.035</td>
<td>5.69</td>
<td>5.69</td>
<td>0.05</td>
<td>1.00</td>
<td>0.20</td>
<td>0.03</td>
<td>75%</td>
<td>95%</td>
<td>0.002</td>
<td>Airless, as assisted containment (ACC) Gun</td>
<td>Fiberglass Mold</td>
</tr>
<tr>
<td>Subtotal</td>
<td></td>
<td></td>
<td></td>
<td>28.42</td>
<td>1.59</td>
<td>25.41</td>
<td>175.05</td>
<td>31.95</td>
<td>25.41</td>
<td>6.53</td>
<td>31.95</td>
<td>28.19</td>
<td>1.57</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>1.41</td>
</tr>
</tbody>
</table>

### HAPs

<table>
<thead>
<tr>
<th>Material</th>
<th>Density (Lb/Gal)</th>
<th>Gal of Mat. (gal/unit)</th>
<th>Maximum (unit/hr)</th>
<th>Potential to Emit Dimethyl phthalate (tons/year)</th>
<th>Potential to Emit Styrene (tons/year)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Production Gel Coat</td>
<td>9.17</td>
<td>0.155</td>
<td>3.500</td>
<td>60%</td>
<td>1.47</td>
</tr>
<tr>
<td>Tooling Gel Coat</td>
<td>9.17</td>
<td>0.230</td>
<td>0.105</td>
<td>60%</td>
<td>0.49</td>
</tr>
</tbody>
</table>

### Methology

- **Pounds of VOC per Gallon Coating less Water** = (Density (lb/gal) * Weight % Organics) / (1 - Volume % water)
- **Pounds of VOC per Gallon Coating** = (Density (lb/gal) * Weight % Organics) / (1 - Volume % water)
- **Potential VOC Pounds per Hour** = Pounds of VOC per Gallon Coating * Maximum (unit/hr) / (1 - Volume % solids) / (1 - Transfer Efficiency) / (1 + HAP Hr/s)
- **Particulate Potential Tons per Year** = (Potential VOC Tons per Year * 8760 hrs/year) / (1 + Transfer Efficiency) / (1 + HAP Hr/s)
- **Potential to Emit Dimethyl phthalate** = (Density (lb/gal) * Maximum (unit/hr) * % Weight HAP) * 8760 hours * 1 year * 1000/2000 lbs
- **Total VOC Weight Coating** = Sum of all solvents used

### Potential VOC Pounds per Hour

\[
\text{Potential VOC Pounds per Hour} = \text{Pounds of VOC per Gallon coating (lb/gal)} \times \text{Gal of Material (gal/unit)} \times \text{Maximum (units/hr)}
\]

### Pounds VOC per Gallon Coating less Water

\[
\text{Pounds of VOC per Gallon Coating less Water} = \left( \frac{\text{Density (lb/gal)} \times \text{Weight % Organics}}{1 - \text{Volume % Water}} \right)
\]

### Potential to Emit (tons/year)

\[
\text{Potential to Emit (tons/year)} = \frac{\text{Density (lb/gal)} \times \text{Gal of Material (gal/unit)} \times \text{Maximum (units/hr)} \times (1 - \text{Weight % Volatiles}) \times (1 - \text{Transfer efficiency}) \times (8760 \text{ hrs/yr}) \times (1 \text{ ton/2000 lbs})}{1000 \text{ lbs/ton}}
\]

### METHODOLOGY

**HAPs**

The following materials are calculated using the values found in the SDS and following U.S. EPA AP 42 guidance.

<table>
<thead>
<tr>
<th>Material</th>
<th>Density (lb/gal)</th>
<th>Weight %</th>
<th>Weight % Water</th>
<th>Volume % Water</th>
<th>Volume % Non-volatile (solids)</th>
<th>Maximum (units/hr)</th>
<th>Transfer Efficiency</th>
<th>Application Method</th>
<th>Substrate</th>
</tr>
</thead>
<tbody>
<tr>
<td>Glass Wet out</td>
<td>1.17</td>
<td>62.00%</td>
<td>0%</td>
<td>0%</td>
<td>0%</td>
<td>0.030</td>
<td>1.00</td>
<td>Mechanical applicator for Glass Wet out</td>
<td>Plastic</td>
</tr>
<tr>
<td>MDEP-825H</td>
<td>2.17</td>
<td>98.00%</td>
<td>0%</td>
<td>0%</td>
<td>0%</td>
<td>0.850</td>
<td>0.65</td>
<td>Mechanical applicator for Glass Wet out</td>
<td>Plastic</td>
</tr>
</tbody>
</table>

Add worst case coating to all solvents

### METHODOLOGY

**Tooling Resin**

<table>
<thead>
<tr>
<th>Material</th>
<th>Density (lb/gal)</th>
<th>Weight %</th>
<th>Weight % Water</th>
<th>Volume % Water</th>
<th>Volume % Non-volatile (solids)</th>
<th>Maximum (units/hr)</th>
<th>Transfer Efficiency</th>
<th>Application Method</th>
<th>Substrate</th>
</tr>
</thead>
<tbody>
<tr>
<td>Tooling Resin</td>
<td>1.07</td>
<td>70.00%</td>
<td>0%</td>
<td>0%</td>
<td>0%</td>
<td>0.020</td>
<td>0.95</td>
<td>Mechanical applicator for Glass Wet out</td>
<td>Plastic</td>
</tr>
</tbody>
</table>

### METHODOLOGY

**VOC and Particulate**

Production Resin

<table>
<thead>
<tr>
<th>Material</th>
<th>Density (lb/gal)</th>
<th>Weight %</th>
<th>Weight % Water</th>
<th>Volume % Water</th>
<th>Volume % Non-volatile (solids)</th>
<th>Maximum (units/hr)</th>
<th>Transfer Efficiency</th>
<th>Application Method</th>
<th>Substrate</th>
</tr>
</thead>
<tbody>
<tr>
<td>MEKP-925H</td>
<td>5.55</td>
<td>98.00%</td>
<td>0%</td>
<td>0%</td>
<td>0%</td>
<td>0.850</td>
<td>0.65</td>
<td>Mechanical applicator for Glass Wet out</td>
<td>Plastic</td>
</tr>
</tbody>
</table>

Appendix A: Emissions Calculations

**VOC and Particulate**

From Surface Coating Operations

Company Name: Barletta Boat Company

Source Address: 3767 County Road 133, Bristol, IN 46507

Operating Permit No.: T09-40489-0567

Minor Source Modification No.: T09-40489-0567

Review: Alexandre Neuzerling

**Grand Total**

- **Uncontrolled Particulate**: 0.9508 tons/year
- **HAPs**: 3.16 tons/year
- **VOC**: 86.66 tons/year

**Potential to Emit (tons/year)**

\[
\text{Potential to Emit (tons/year)} = \frac{\text{Density (lb/gal)} \times \text{Gal of Material (gal/unit)} \times \text{Maximum (units/hr)} \times (1 - \text{Weight % Volatiles}) \times (1 - \text{Transfer efficiency}) \times (8760 \text{ hrs/yr}) \times (1 \text{ ton/2000 lbs})}{1000 \text{ lbs/ton}}
\]

###頁20 of 33 TSD App. A
### Appendix A: Emissions Calculations

#### VOC and Particulate From Surface Coating Operations

**Company Name:** Barletta Boat Company  
**Source Address:** 51687 County Road 133, Bristol, IN 46507  
**Operating Permit No.:** T039-40049-00807  
**Minor Source Modification No.:** 039-43532-00807  
**Minor Permit Modification No.:** 039-43547-00807  
**Reviewer:** Alexandrea Neuzerling

**Material Density (Lb/Gal)**

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Arnot L6530 T-22</td>
<td>9.20</td>
<td>33.17%</td>
<td>0.00%</td>
<td>83.93</td>
<td>83.93</td>
<td>5.000</td>
<td>3.500</td>
<td>6.75</td>
<td>162.09</td>
<td>29.58</td>
<td>29.58</td>
<td>0.00</td>
<td>0.00</td>
<td>29.58</td>
<td>Plastic</td>
</tr>
<tr>
<td>MEKP-925H</td>
<td>9.17</td>
<td>62.00%</td>
<td>0.00%</td>
<td>0.62</td>
<td>0.00</td>
<td>0.075</td>
<td>3.500</td>
<td>5.69</td>
<td>1.49</td>
<td>35.83</td>
<td>0.00</td>
<td>100%</td>
<td>Manual, hand, brush, roller, FIT applicator for Glass Wet out</td>
<td>Plastic</td>
<td></td>
</tr>
</tbody>
</table>

The material is applied via roll, flow, or brush.

Add worst case coating to all solvents.

Weight % Styrene Monomer or VOC and Weight % MMA taken from SDS.

Emission Factors were taken from ACMA UEF-1-2011a, October 5, 2011 Revision, and determined as follows:

- Gel Coat: CFA Unified Emission Factor: Styrene (lb/ton) = 0.445 x %styrene x 2000.
- Gel Coat: CFA Unified Emission Factor: MMA (lb/ton) = 75 lb/ton based on 5.00% MMA.
- Gel Coat: VOC emission factor = Styrene emission factor + MMA emission factor.

**METHODOLOGY**

Potential VOC Pounds per Gallon of Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % Water)

Potential VOC Pounds per Gallon of Coating = (Density (lb/gal) * Weight % Organics)

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

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

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

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

Total = Worst Coating + Sum of all solvents used

**HAPs**

<table>
<thead>
<tr>
<th>Material</th>
<th>Density (lb/Gal)</th>
<th>Gal of Mat. (gal/unit)</th>
<th>Maximum (unit/hour)</th>
<th>Weight % Dimethyl phthalate</th>
<th>Potential to Emit Dimethyl phthalate (ton/year)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Production Resin</td>
<td>9.17</td>
<td>0.075</td>
<td>3.500</td>
<td>2.0%</td>
<td>6.33</td>
</tr>
</tbody>
</table>

**Surcoat.xls 9/95**
## Appendix A: Emissions Calculations

### Particulate

#### From Grinding Room Operations

**Company Name:** Barletta Boat Company  
**Source Address:** 51687 County Road 133, Bristol, IN 46507  
**Operating Permit No.:** T039-40049-00807  
**Minor Source Modification No.:** 039-43532-00807  
**Minor Permit Modification No.:** 039-43547-00807  
**Reviewer:** Alexandrea Neuzerling

<table>
<thead>
<tr>
<th>Process</th>
<th>Maximum Outlet Grain Loading (gr/dscf)</th>
<th>Maximum Air Flow Rate (acfm)</th>
<th>Control Efficiency %</th>
<th>Controlled Potential to Emit PM/PM10/PM2.5 (lb/hr)</th>
<th>Uncontrolled Potential to Emit PM/PM10/PM2.5 (lb/hr)</th>
<th>Controlled Potential to Emit PM/PM10/PM2.5 (ton/yr)</th>
<th>Uncontrolled Potential to Emit PM/PM10/PM2.5 (ton/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Grinding Room GR1</td>
<td>0.001</td>
<td>3500</td>
<td>99%</td>
<td>0.03</td>
<td>0.1314</td>
<td>3</td>
<td>13.14</td>
</tr>
</tbody>
</table>

**Methodology:**  
Controlled Potential to Emit PM/PM10/PM2.5 (lb/hr) = Maximum Outlet Grain Loading (gr/dscf) * Maximum Air Flow Rate (acfm) * 60min/hr / 7000gr/lb  
Controlled Potential to Emit PM/PM10/PM2.5 (ton/yr) = Controlled Potential to Emit (lb/hr) * 8760 hr/yr / 2000 lb/ton  
Uncontrolled Potential to Emit PM/PM10/PM2.5 (lb/hr) = Controlled Potential to Emit PM/PM10/PM2.5 (lb/hr) / (1-Control Efficiency %))  
Uncontrolled Potential to Emit PM/PM10/PM2.5 (ton/yr) = Uncontrolled Potential to Emit PM/PM10/PM2.5 (lb/hr) * 8760 hr/year / 2000 lb/ton

### 326 IAC 6-3-2 Limitation

<table>
<thead>
<tr>
<th>Process</th>
<th>Maximum Process Weight Rate (ton/hr)</th>
<th>Allowable Particulate Emission Rate (lb/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Grinding Room GR1</td>
<td>0.75</td>
<td>3.38</td>
</tr>
</tbody>
</table>

Allowable emissions under 326 IAC 6-3-2 are calculated using the equation where the process weight rate is up to sixty thousand (60,000) pounds per hour:

\[
E = 4.10 P ^{0.67}
\]

Where:  
\(E\) = rate of emission in pounds per hour  
\(P\) = process weight rate in tons per hour
### METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1 - Volume % water)

Potential VOC Pounds per Day = Pounds of VOC per Gallon Coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)

Potential VOC Pounds per Hour = Pounds of VOC per Gallon Coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)

Pounds of VOC per Gallon of Solids = (Density (lb/gal) * Weight % organics) / (1 - Volume % solids)

Total = Worst Coating + Sum of all solvents used

- Application method exempted under 326 IAC 6-3-1(b)(5)-(8) are dip, roll, flow, and brush.
- For Article 6 purposes “Surface Coating” is defined as the application of a solvent or water-based coating to a surface that imparts protective, functional, or decorative films in which the application emits, or has the potential to emit, particulate.

### HAPs

<table>
<thead>
<tr>
<th>Material</th>
<th>Density (lb/gal)</th>
<th>Gal of Mat (gal/unit)</th>
<th>Maximum (unit/hour)</th>
<th>% Weight Toluene</th>
<th>% Weight Xylene</th>
<th>% Weight MIBK</th>
<th>% Weight Ethylbenzene</th>
<th>% Weight Methanol</th>
<th>Potential to Emit (ton/year)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Acrylic Lacquer Thinner (DT-10)</td>
<td>6.81</td>
<td>0.007</td>
<td>3.50</td>
<td>50.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>35.00%</td>
<td>0.37</td>
</tr>
<tr>
<td>Low HAPs Baemaster Mtd Temp LH7375 Base</td>
<td>6.59</td>
<td>0.250</td>
<td>3.50</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00</td>
</tr>
<tr>
<td>Medium Reducer 12275S Reducer</td>
<td>7.09</td>
<td>0.125</td>
<td>3.50</td>
<td>0.10%</td>
<td>20.00%</td>
<td>10.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00</td>
</tr>
<tr>
<td>Reducer Medium Temperature 43475S Hardner</td>
<td>7.67</td>
<td>0.063</td>
<td>3.50</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00</td>
</tr>
<tr>
<td>G2-4500 Clear Coat As Applied W/G2-4081</td>
<td>8.12</td>
<td>0.250</td>
<td>3.50</td>
<td>0.00%</td>
<td>17.24%</td>
<td>1.03%</td>
<td>4.27%</td>
<td>0.00%</td>
<td>0.00</td>
</tr>
</tbody>
</table>

| Total | 8.06 | 1.04 | 2.05 | 0.26 |

MBK = Methyl Isobutyl Ketone

Potential to Emit (ton/year) = Density (lb/gal) * Gal of Mat. (gal/unit) * Maximum (unit/hour) * % Weight HAP * 8760 hours/ yr * 1 ton/2000 lbs
### VOC and Particulate

#### From Surface Coating Operations

**Company Name:** Barletta Boat Company  
**Source Address:** 51687 County Road 133, Bristol, IN 46507  
**Operating Permit No.:** T039-40048-00807  
**Minor Source Modification No.:** 039-43532-00807  
**Minor Permit Modification No.:** 039-43547-00807  
**Reviewer:** Alexandrea Neuzerling

#### Material Density (Lb/Gal)  
<table>
<thead>
<tr>
<th>Material</th>
<th>Density (Lb/Gal)</th>
<th>Weight % Volatile (H2O &amp; Organics)</th>
<th>Weight % Water</th>
<th>Weight % Organics</th>
<th>Volume % Non-Volatiles (solids)</th>
<th>Volume % Water</th>
<th>Gal of Mat. (gal/unit)</th>
<th>Max (unit/hour)</th>
<th>Pounds VOC per gallon of coating less water</th>
<th>Pounds VOC per gallon of coating</th>
<th>Potential VOC pounds per hour</th>
<th>Potential VOC pounds per day</th>
<th>Potential VOC tons per year</th>
<th>Particulate Potential (ton/yr)</th>
<th>lb VOC/gal solids</th>
<th>Transfer Efficiency</th>
</tr>
</thead>
<tbody>
<tr>
<td>Acrylic Lacquer Thinner (DTL 10)</td>
<td>6.93</td>
<td>100.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>1.00%</td>
<td>6.93</td>
<td>6.93</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>100%</td>
<td></td>
</tr>
<tr>
<td>Spray n' Go Decorative Enamel</td>
<td>6.23</td>
<td>100.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>1.00%</td>
<td>6.93</td>
<td>6.93</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>100%</td>
<td></td>
</tr>
<tr>
<td>2225 Promotor</td>
<td>7.30</td>
<td>100.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>1.00%</td>
<td>6.93</td>
<td>6.93</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>100%</td>
<td></td>
</tr>
<tr>
<td>12355S Activator</td>
<td>8.51</td>
<td>100.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>1.00%</td>
<td>6.93</td>
<td>6.93</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>100%</td>
<td></td>
</tr>
<tr>
<td>G2-4500 Clear Coat</td>
<td>7.92</td>
<td>100.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>1.00%</td>
<td>6.93</td>
<td>6.93</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>100%</td>
<td></td>
</tr>
<tr>
<td>7175S Base</td>
<td>6.65</td>
<td>100.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>1.00%</td>
<td>6.93</td>
<td>6.93</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>100%</td>
<td></td>
</tr>
<tr>
<td>3602S Thinner</td>
<td>6.64</td>
<td>100.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>1.00%</td>
<td>6.93</td>
<td>6.93</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>100%</td>
<td></td>
</tr>
</tbody>
</table>

#### METHODOLOGY

**Uncontrolled Potential to Emit (ton/year) = Density (lb/gal) * Gal. of Mat. (gal/unit) * Max (unit/hour) * % Weight of HAP * 8760 hours/yr * 1 ton/2000 lbs**

**Combined HAPs** 0.59  
**Worst Single HAP** 0.34

---

### Material Density

<table>
<thead>
<tr>
<th>Material</th>
<th>Density (Lb/Gal)</th>
<th>Weight % Volatile (H2O &amp; Organics)</th>
<th>Weight % Water</th>
<th>Weight % Organics</th>
<th>Volume % Non-Volatiles (solids)</th>
<th>Volume % Water</th>
<th>Gal of Mat. (gal/unit)</th>
<th>Max (unit/hour)</th>
<th>Pounds VOC per gallon of coating less water</th>
<th>Pounds VOC per gallon of coating</th>
<th>Potential VOC pounds per hour</th>
<th>Potential VOC pounds per day</th>
<th>Potential VOC tons per year</th>
<th>Particulate Potential (ton/yr)</th>
<th>lb VOC/gal solids</th>
<th>Transfer Efficiency</th>
</tr>
</thead>
<tbody>
<tr>
<td>Acrylic Lacquer Thinner (DTL 10)</td>
<td>6.93</td>
<td>100.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>1.00%</td>
<td>6.93</td>
<td>6.93</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>100%</td>
<td></td>
</tr>
<tr>
<td>Spray n' Go Decorative Enamel</td>
<td>6.23</td>
<td>100.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>1.00%</td>
<td>6.93</td>
<td>6.93</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>100%</td>
<td></td>
</tr>
<tr>
<td>2225 Promotor</td>
<td>7.30</td>
<td>100.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>1.00%</td>
<td>6.93</td>
<td>6.93</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>100%</td>
<td></td>
</tr>
<tr>
<td>12355S Activator</td>
<td>8.51</td>
<td>100.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>1.00%</td>
<td>6.93</td>
<td>6.93</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>100%</td>
<td></td>
</tr>
<tr>
<td>G2-4500 Clear Coat</td>
<td>7.92</td>
<td>100.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>1.00%</td>
<td>6.93</td>
<td>6.93</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>100%</td>
<td></td>
</tr>
<tr>
<td>7175S Base</td>
<td>6.65</td>
<td>100.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>1.00%</td>
<td>6.93</td>
<td>6.93</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>100%</td>
<td></td>
</tr>
<tr>
<td>3602S Thinner</td>
<td>6.64</td>
<td>100.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>1.00%</td>
<td>6.93</td>
<td>6.93</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>100%</td>
<td></td>
</tr>
</tbody>
</table>

---

### Uncontrolled Potential to Emit (ton/year)

**Acrylic Lacquer Thinner (DTL 10)** 0.39  
**Spray n' Go Decorative Enamel** 9.34  
**2225 Promotor** 1.71  
**12355S Activator** 0.24

---

### Total Potential to Emit

Add worst case coating to all solvents  
0.39 + 9.34 + 1.71 + 0.24 = 12.62

---

### METHODOLOGY

**Particulate Control Efficiency** 95%  
**Controlled Particulate PTE** 0.01 ton/year
## Appendix A: Emissions Calculations

### Particulate From Woodworking Operations

**Company Name:** Barletta Boat Company  
**Source Address:** 51687 County Road 133, Bristol, IN 46507  
**Operating Permit No.:** T039-40049-00807  
**Minor Source Modification No.:** 039-43532-00807  
**Minor Permit Modification No.:** 039-43547-00807  
**Reviewer:** Alexandrea Neuzerling

<table>
<thead>
<tr>
<th>Control Device ID</th>
<th>Outlet Grain Loading (gr/dscf)</th>
<th>Air Flow (dscf/min)</th>
<th>Control Efficiency %</th>
<th>Controlled Potential to Emit PM/PM10/PM2.5 (lb/hr)</th>
<th>Controlled Potential to Emit PM/PM10/PM2.5 (ton/year)</th>
<th>Uncontrolled Potential to Emit PM/PM10/PM2.5 (lb/hr)</th>
<th>Uncontrolled Potential to Emit PM/PM10/PM2.5 (ton/year)</th>
</tr>
</thead>
<tbody>
<tr>
<td>INDC</td>
<td>0.02</td>
<td>1100</td>
<td>99%</td>
<td>0.189</td>
<td>0.826</td>
<td>18.86</td>
<td>82.59</td>
</tr>
</tbody>
</table>

**Methodology:**
- Controlled Potential to Emit PM/PM10/PM2.5 (lb/hr) = Outlet Grain Loading (gr/dscf) * Air Flow (dscf/min) * 60min/1 hour * 1lb/7000gr
- Controlled Potential to Emit PM/PM10/PM2.5 (ton/year) = Controlled Potential to Emit PM/PM10/PM2.5 (lb/hr) * 8760hours/1year * 1ton/2000lbs
- Uncontrolled Potential to Emit PM/PM10/PM2.5 (lb/hr) = Controlled Potential to Emit (lb/hr) / (1-Control Efficiency %)
- Uncontrolled Potential to Emit PM/PM10/PM2.5 (ton/year) = Uncontrolled Potential to Emit PM/PM10/PM2.5 (lb/hr) * 8760hours/1year * 1ton/2000lbs
## Appendix A: Emissions Calculations

### Particulate

**From Chopsaws (CS1 through CS6)**

**Company Name:** Barletta Boat Company  
**Source Address:** 51687 County Road 133, Bristol, IN 46507  
**Operating Permit No.:** T039-40049-00807  
**Minor Source Modification No.:** 039-43532-00807  
**Minor Permit Modification No.:** 039-43547-00807  
**Reviewer:** Alexandrea Neuzerling

<table>
<thead>
<tr>
<th>Process/Operation</th>
<th>Description</th>
<th>ID</th>
<th>Material Input</th>
<th>Material Thickness</th>
<th>Cutting Surface Thickness</th>
<th>Process Rate</th>
<th>Material Loss</th>
<th>Material Density</th>
<th>Uncontrolled Potential to Emit PM/PM10/PM2.5</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Aluminum Cutting Chop Saw</td>
<td>CS1</td>
<td>50</td>
<td>0.1</td>
<td>0.1875</td>
<td>25.0</td>
<td>0.469</td>
<td>0.088</td>
<td>0.04 lb/hr, 0.18 ton/year</td>
</tr>
<tr>
<td></td>
<td>Aluminum Cutting Chop Saw</td>
<td>CS2</td>
<td>50</td>
<td>0.1</td>
<td>0.1875</td>
<td>25.0</td>
<td>0.469</td>
<td>0.088</td>
<td>0.04 lb/hr, 0.18 ton/year</td>
</tr>
<tr>
<td></td>
<td>Aluminum Cutting Chop Saw</td>
<td>CS3</td>
<td>50</td>
<td>0.1</td>
<td>0.1875</td>
<td>25.0</td>
<td>0.469</td>
<td>0.088</td>
<td>0.04 lb/hr, 0.18 ton/year</td>
</tr>
<tr>
<td></td>
<td>Aluminum Cutting Chop Saw</td>
<td>CS4</td>
<td>50</td>
<td>0.1</td>
<td>0.1875</td>
<td>25.0</td>
<td>0.469</td>
<td>0.088</td>
<td>0.04 lb/hr, 0.18 ton/year</td>
</tr>
<tr>
<td></td>
<td>Aluminum Cutting Chop Saw</td>
<td>CS5</td>
<td>50</td>
<td>0.1</td>
<td>0.1875</td>
<td>25.0</td>
<td>0.469</td>
<td>0.088</td>
<td>0.04 lb/hr, 0.18 ton/year</td>
</tr>
<tr>
<td></td>
<td>Aluminum Cutting Chop Saw</td>
<td>CS6</td>
<td>50</td>
<td>0.1</td>
<td>0.1875</td>
<td>25.0</td>
<td>0.469</td>
<td>0.088</td>
<td>0.04 lb/hr, 0.18 ton/year</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>0.25 lb/hr, 1.08 ton/year</td>
</tr>
</tbody>
</table>

Material density data from O'Neal Steel, Inc. Stock List and Reference Book, 1999

**Methodology:**  
Material Loss (in³/hr) = Material Thickness (in) * Cutting Surface Thickness (in) * Process Rate (in/hr)  
Uncontrolled Potential to Emit (PM/PM10/PM2.5) (lb/hr) = Material Loss (in³/hr) * Material Density (lb/in³)  
Uncontrolled Potential to Emit (PM/PM10/PM2.5) (ton/year) = Uncontrolled Potential to Emit (PM/PM10/PM2.5) (lb/hr) * 8760 hours/1year * 1ton/2000lb
## Appendices

### A: Emissions Calculations

#### Welding and Thermal Cutting

**Company Name:** Barletta Boat Company  
**Source Address:** 51687 County Road 133, Bristol, IN 46507  
**Operating Permit No.:** T039-40049-00807  
**Minor Source Modification No.:** 039-43532-00807  
**Minor Permit Modification No.:** 039-43547-00807  
**Reviewer:** Alexandrea Neuzerling

<table>
<thead>
<tr>
<th>PROCESS</th>
<th>Number of Stations</th>
<th>Max. electrode consumption per station (lbs/hr)</th>
<th>EMISSION FACTORS* (lb pollutant/lb electrode)</th>
<th>EMISSIONS (lbs/hr)</th>
<th>HAPS (lbs/hr)</th>
</tr>
</thead>
</table>
|               |                    |                                               | PM = PM10  
|               |                    |                                               | Mn   | Ni | Cr | Mn | Ni | Cr | Mn | Ni | Cr | |
| Welding       |                    |                                               | 0.000 | 0.000 | 0.000 | 0  | 0  | 0  | 0  | 0  | 0  | |
| Submerged Arc | 0                  | 0.036                                         | 0.011 | 0.000 | 0.000 | 0  | 0  | 0  | 0  | 0  | 0  | |
| Metal Inert Gas (MIG)(carbon steel) | 75 | 1 | 0.0055 | 0.0005 | 0.413 | 0.038 | 0.000 | 0  | 0  | 0  | 0.038 |
| Stick (E7018 electrode) | 0 | 0.0211 | 0.0009 | 0.0000 | 0.000 | 0  | 0  | 0  | 0  | 0  | 0  | |
| Tungsten Inert Gas (TIG)(carbon steel) | 0 | 0.0055 | 0.0005 | 0.000 | 0.000 | 0  | 0  | 0  | 0  | 0  | 0  | |
| Oxyacetylene(carbon steel) | 0 | 0.0055 | 0.0005 | 0.000 | 0.000 | 0  | 0  | 0  | 0  | 0  | 0  | |

### 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

Using AWS average values: 

\[
\text{Cutting emissions, lb/hr} = \left(\frac{0.25 \text{ g/min}}{3.6 \text{ m/min}}\right) \times \left(\frac{0.0022 \text{ lb/g}}{39.37 \text{ in./m}}\right) \times (1,000 \text{ in.}) = 0.0039 \text{ lb/1,000 in. cut, 8 mm thick}
\]

Plasma cutting emissions, lb/hr: 

\[
\text{Plasma cutting emissions, lb/hr} = \left(\frac{\text{num. metal thickness, in.} \times \text{max. cutting rate, in./min.} \times \text{emission factor, lb pollutant/1,000 in. cut, 8 mm thick}}{\text{60 min./hr}}\right)
\]

Welding emissions, lb/hr: 

\[
\text{Welding emissions, lb/hr} = \left(\frac{\text{emission factor, lb. pollutant/lb. of electrode used}}{\text{num. stations}}\right) \times \left(\frac{\text{max. lbs of electrode used/hr/station}}{\text{emission factor, lb. pollutant/lb. of electrode used}}\right)
\]

Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day

Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/year x 1 ton/2,000 lbs
### Appendix A: Emissions Calculations
#### Natural Gas Combustion Only

**MM BTU/HR <100**

**Company Name:** Barletta Boat Company  
**Source Address:** 51687 County Road 133, Bristol, IN 46507  
**Operating Permit No.:** T039-40049-00807  
**Minor Source Modification No.:** 039-43532-00807  
**Minor Permit Modification No.:** 039-43547-00807  
**Reviewer:** Alexandrea Neuzerling

<table>
<thead>
<tr>
<th>Emission Unit/ID</th>
<th>No. of Units</th>
<th>Unit</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Heaters (H1-H8)</td>
<td>8</td>
<td>0.125</td>
<td>1.00</td>
</tr>
<tr>
<td>Heaters (H9-H31)</td>
<td>23</td>
<td>0.1</td>
<td>2.30</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>31</strong></td>
<td></td>
<td><strong>3.30</strong></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Potential Emission in tons/yr</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM*</td>
<td>0.03</td>
</tr>
<tr>
<td>PM10*</td>
<td>0.11</td>
</tr>
<tr>
<td>direct PM2.5*</td>
<td>0.11</td>
</tr>
<tr>
<td>SO2</td>
<td>0.01</td>
</tr>
<tr>
<td>NOx</td>
<td>1.42</td>
</tr>
<tr>
<td>VOC</td>
<td>0.08</td>
</tr>
<tr>
<td>CO</td>
<td>1.19</td>
</tr>
</tbody>
</table>

**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)

<table>
<thead>
<tr>
<th>HAPs - Organics</th>
<th>Benzene</th>
<th>Dichlorobenzene</th>
<th>Formaldehyde</th>
<th>Hexane</th>
<th>Toluene</th>
<th>Total - Organics</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emission Factor in lb/MMCF</td>
<td>2.1E-03</td>
<td>1.2E-03</td>
<td>7.5E-02</td>
<td>1.6E+00</td>
<td>3.4E-03</td>
<td>4.8E-05</td>
</tr>
<tr>
<td>Potential Emission in tons/yr</td>
<td>3.0E-05</td>
<td>1.7E-05</td>
<td>1.1E-03</td>
<td>0.03</td>
<td>4.8E-05</td>
<td>0.03</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>HAPs - Metals</th>
<th>Lead</th>
<th>Cadmium</th>
<th>Chromium</th>
<th>Manganese</th>
<th>Nickel</th>
<th>Total - Metals</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emission Factor in lb/MMCF</td>
<td>5.0E-04</td>
<td>1.1E-03</td>
<td>1.4E-03</td>
<td>3.8E-04</td>
<td>2.1E-03</td>
<td>7.8E-05</td>
</tr>
<tr>
<td>Potential Emission in tons/yr</td>
<td>3.0E-05</td>
<td>1.1E-03</td>
<td>2.0E-06</td>
<td>4.8E-06</td>
<td>1.6E-05</td>
<td>7.8E-05</td>
</tr>
</tbody>
</table>

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: Emissions Calculations
From Surface Coating Operations
Assembly Operation AO1

Company Name: Barletta Boat Company
Source Address: 51687 County Road 133, Bristol, IN 46507
Minor Source Modification No.: 039-43532-00807
Minor Permit Modification No.: 039-43547-00807
Reviewer: Alexandrea Neuzerling

1. VOC and PM

<table>
<thead>
<tr>
<th>Manufacturer</th>
<th>Material</th>
<th>Density (lb/gal)</th>
<th>Weight % Volatile (H2O &amp; Organics)</th>
<th>Weight % Water &amp; Exempts</th>
<th>Weight % Organics</th>
<th>Volume % Water &amp; Exempts</th>
<th>Gal of Mat. (gal/unit)</th>
<th>Maximum (unit/hour)</th>
<th>Pounds VOC per Gallon of coating (lb/unit)</th>
<th>Potential VOC Pounds per Day (lb/day)</th>
<th>Particulate Potential Tons per Year (ton/hr)</th>
<th>Galions of Coating (gal/day)</th>
<th>Application Method</th>
<th>Transfer Efficiency</th>
<th>Substrate</th>
</tr>
</thead>
<tbody>
<tr>
<td>IPS Corporation</td>
<td>SciGrp SG300-05</td>
<td>8.92</td>
<td>4.68%</td>
<td>0.00%</td>
<td>4.68%</td>
<td>0.00%</td>
<td>0.0630</td>
<td>3.50</td>
<td>0.42</td>
<td>0.42</td>
<td>0.09</td>
<td>2.21</td>
<td>Flow Coating</td>
<td>100%</td>
<td>Plastic</td>
</tr>
</tbody>
</table>

Total or Worst Case Potential to Emit: 0.09 2.21 0.40 0.00

Source also uses acetone, but this is not counted towards VOC and HAP emissions since it is neither VOC or HAP.

METHODOLOGY

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)

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

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hrs/yr) * (1 ton/2000 lbs)

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

Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)

Total = Worst Coating + Sum of all solvents used

- Application method exempted under 326 IAC 6-3-1(b)(5)-(8) are dip, roll, flow, and brush.
- For Article 6 purposes "Surface Coating" is defined as the application of a solvent or water-based coating to a surface that imparts protective, functional, or decorative films in which the application emits, or has the potential to emit, particulate.
- Therefore, coatings that do not have potential to emit particulate do not meet the definition of "surface coating" under 326 IAC 6-3-1.5 and are not subject to the requirements of 326 IAC 6-3-2.
- For Article 8-2-9 purposes: While aerosol coatings are not discussed in 326 IAC 8-2-9, the EPA Control Techniques Guidelines (CTG) for Miscellaneous Metal and Plastic Parts Coatings, EPA-453/R-08-003, September 2008, states that aerosol coatings (sealants, adhesives, and floor preparation materials) are not included in miscellaneous metal parts or plastic parts coating categories.
- Therefore, the aerosol coatings used in the miscellaneous coating usage operation and are not subject to the requirements of 326 IAC 8-2-6.
- For Article 8-2-9 purposes: Application of cleaning solvents/products to the final product to remove fingerprints, dust, etc., (i.e., not related to removing dried paint) are not considered surface coating operations.

HAPs

<table>
<thead>
<tr>
<th>Material</th>
<th>Density (lb/gal)</th>
<th>Gal of Mat. (gal/unit)</th>
<th>Maximum (unit/hour)</th>
<th>% Weight Methyl Methacrylate Monomer (MMA)</th>
<th>% Weight Styrene</th>
<th>Potential to Emit (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>SciGrp SG300-05</td>
<td>8.92</td>
<td>0.063</td>
<td>3.50</td>
<td>3.04%</td>
<td>0.19%</td>
<td>0.26</td>
</tr>
<tr>
<td>MDI = P, P'- Methylenebis(phényl isocyanate)</td>
<td></td>
<td></td>
<td>0.26</td>
<td>0.26</td>
<td>0.26</td>
<td>0.26</td>
</tr>
</tbody>
</table>

Methodology

Potential to Emit (tons/year) = Density (lb/gal) * Gal of Mat. (gal/unit) * Maximum (unit/hour) * % Weight HAP * 8760 hours / 1 year * 1ton/2000lbs
## VOC and PM

| Manufacturer | Material | Density (lb/gal) | Weight % Volatile (H2O & Organics) | Weight % Water & Exempts | Weight % Organics | Volume % Water & Exempts | Gal of Mat. (gal/unit) | Maximum Pounds VOC per Gallon of coating (lb/unit) | Potential VOC Pounds per Hour (lb/unit) | Potential VOC Pounds per Day (lb/day) | Potential VOC Tons per Year (ton/yr) | Particulate Potential (ton/yr) | Galons of Coating (gal/day) | Application Method | Transfer Efficiency | Substrate |
|--------------|----------|----------------|----------------------------------|--------------------------|-------------------|--------------------------|-----------------------|-----------------------------------------------|--------------------------------|--------------------------------|--------------------------------|----------------------------|-----------------|----------------------|----------------|-----------|-----------|
| Henkel       | Frekote Mold Release 548965 | 6.05 | 99.80% | 0.00% | 99.80% | 0.00% | 0.2500 | 0.04 | 6.04 | 6.04 | 0.05 | 1.27 | 0.23 | 0.00 | 0.21 | Flow Coating | 100% | Fiberglass Molds |
| Recco        | Partal Film #10 | 8.17 | 29.40% | 0.00% | 29.40% | 0.00% | 0.2500 | 0.04 | 2.40 | 2.40 | 0.02 | 0.50 | 0.09 | 0.00 | 0.21 | Flow Coating | 100% | Fiberglass Molds |

The material does not contain HAPs per the SDS.

Notes:
- IDEM, OAQ has determined that application of Russell Products R1-676 adhesive and Henkel Adhesive/Sealant in RV assembly operations at this source when using non-atomizing spray does not generate particulate emissions. Therefore, this adhesive operation does not meet the definition of “surface coating” under 326 IAC 6-3-1.5 and is not subject to the requirements of 326 IAC 6-3-2.

### METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)

Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)

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

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

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hrs/yr) / (1 ton/2000 lbs)

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

Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)

Total = Worst Coating + Sum of all solvents used

- Application method exempted under 326 IAC 6-3-1(b)(5)-(8) are dip, roll, flow, and brush.
- For Article 6 purposes "Surface Coating" is defined as the application of a solvent or waterbased coating to a surface that imparts protective, functional,or decorative films in which the application emits, or has the potential to emit, particulate. Therefore, coatings that do not have potential to emit particulate do not meet the definition of "surface coating" under 326 IAC 6-3-1.5 and are not counted towards the gallons per day used and are not subject to 326 IAC 6-3-2.
- For Article 8-2-9 purposes: While aerosol coatings are not discussed in 326 IAC 8-2-9, the EPA Control Techniques Guidelines (CTG) for Miscellaneous Metal and Plastic Parts Coatings, EPA-453/R-08-003, September 2008, states that aerosol coatings (sealants, adhesives, and floor preparation materials) are not included in miscellaneous metal parts or plastic parts coating categories. Therefore, the aerosol coatings used in the miscellaneous coating usage operation and are not subject to the requirements of 326 IAC 8-2-9.
- For Article 8-2-9 purposes: Application of cleaning solvents/products to the final product to remove fingerprints, dust, etc., i.e., not related to removing dried paint) are not considered surface coating operations.
## Appendix A: Emissions Calculations
### From Surface Coating Operations
#### Final Finish Operation FF1

**Company Name:** Barletta Boat Company  
**Source Address:** 51687 County Road 133, Bristol, IN 46507  
**Operating Permit No.:** 7039-40048-00807  
**Minor Source Modification No.:** 039-43532-00807  
**Minor Permit Modification No.:** 039-43547-00807  
**Reviewer:** Alexandrea Neuzerling

---

### 1. VOC and PM

<table>
<thead>
<tr>
<th>Manufacturer</th>
<th>Material</th>
<th>Density (lb/gal)</th>
<th>Weight % Volatile (H2O &amp; Organics)</th>
<th>Weight % Water &amp; Exempts</th>
<th>Volume % Water &amp; Exempts</th>
<th>Gal of Mat. (gal/unit)</th>
<th>Maximum (units/hour)</th>
<th>Pounds VOC per Gallon of Coating less Water &amp; Exempts</th>
<th>Pounds VOC per gallon of coating</th>
<th>Potential VOC (lb/hour)</th>
<th>Particulate Potential (ton/yr)</th>
<th>Gallons of Coating (gal/day)</th>
<th>Application Method</th>
<th>Transfer Efficiency</th>
<th>Substrate</th>
</tr>
</thead>
<tbody>
<tr>
<td>3M Company</td>
<td>Perfect It Extra Cut Compound</td>
<td>8.34</td>
<td>77.50%</td>
<td>3.10%</td>
<td>74.40%</td>
<td>0.00%</td>
<td>0.0500</td>
<td>3.50</td>
<td>6.20</td>
<td>6.20</td>
<td>1.09</td>
<td>26.06</td>
<td>4.76</td>
<td>0.00</td>
<td>4.20</td>
</tr>
</tbody>
</table>

**Notes:**  
Source also uses acetone, but this is not counted towards VOC and HAP emissions since it is neither VOC or HAP.  
The material does not contain HAPs per the SDS.

### METHODOLOGY

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

- Application method exempted under 326 IAC 6-3-1(b)(5)-(8) are dip, roll, flow, and brush.  
- For Article 6 purposes “Surface Coating” is defined as the application of a solvent or waterbased coating to a surface that imparts protective, functional, or decorative films in which the application emits, or has the potential to emit, particulate. Therefore, coatings that do not have potential to emit particulate do not meet the definition of “surface coating” under 326 IAC 6-3-1.5 and are not counted towards the gallons per day used and are not subject to 326 IAC 6-3-2.

- For Article 6-3-2 purposes: While aerosol coatings are not discussed in 326 IAC 6-3-2, the EPA Control Techniques Guidelines (CTG) for Miscellaneous Metal and Plastic Parts Coatings, EPA-453/R-08-003, September 2008, states that aerosol coatings (sealants, adhesives, and floor preparation materials) are not included in miscellaneous metal parts or plastic parts coating categories. Therefore, the aerosol coatings used in the miscellaneous coating usage operation and are not subject to the requirements of 326 IAC 8-2-9.

- For Article 8-2-9 purposes: Application of cleaning solvents/products to the final product to remove fingerprints, dust, etc... (i.e., not related to removing dried paint) are not considered surface coating operations.
## Appendix A: Emission Calculations

### Fuel Storage Tanks

#### Volatile Organic Compound (VOC)

**Company Name:** Barletta Boat Company  
**Source Address:** 51687 County Road 133, Bristol, IN 46507  
**Operating Permit No.:** [phone number] 039-40049-00807  
**Minor Source Modification No.:** [phone number] 039-43532-00807  
**Minor Permit Modification No.:** [phone number] 039-43547-00807  
**Reviewer:** Alexandrea Neuzerling

Volatile Organic Compound (VOC) Emissions From Storage Tanks (Working and Breathing Losses) Using US EPA TANKS Version 4.09 program*

VOC emissions from storage tanks were determined by using US EPA TANKS Version 4.09 program.

<table>
<thead>
<tr>
<th>Storage Tank ID</th>
<th>Product Stored</th>
<th>Tank Type</th>
<th>Tank Color/Order</th>
<th>Tank Dimensions</th>
<th>Maximum Liquid Volume (gallons)</th>
<th>Turnovers per year</th>
<th>Product Throughput (gallons/yr)</th>
<th>VOC Working Losses (lbs/yr)</th>
<th>VOC Breathing Losses (lbs/yr)</th>
<th>Total VOC Losses (lbs/yr)</th>
<th>VOC Working Losses (tons/yr)</th>
<th>VOC Breathing Losses (tons/yr)</th>
<th>Total VOC Losses (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>ASTG Gasoline</td>
<td>AST</td>
<td>Horizontal</td>
<td>Red/Primer</td>
<td>6.2 x 4</td>
<td>560</td>
<td>12.00</td>
<td>6,600</td>
<td>76.89</td>
<td>594.55</td>
<td>671.44</td>
<td>0.038</td>
<td>0.259</td>
<td>0.297</td>
</tr>
<tr>
<td>ASTD Diesel</td>
<td>AST</td>
<td>Horizontal</td>
<td>Red/Primer</td>
<td>6.2 x 4</td>
<td>560</td>
<td>12.00</td>
<td>6,600</td>
<td>0.13</td>
<td>0.22</td>
<td>0.35</td>
<td>6.50E-05</td>
<td>1.10E-04</td>
<td>1.80E-04</td>
</tr>
</tbody>
</table>

**negl. = negligible**  
**Totals 594.9  0.30**

**Methodology**  
**Abbreviations**  
**Includes any vapor loss between underground tank and gas pump**  
**PTE = Potential to Emit**  

The gasoline throughput was provided by the source.

PTE of VOC (tons/yr) = \(\text{Gasoline Throughput (kgal/yr)} \times \text{Emission Factor (lb/kgal)} \times \frac{1}{2000 \text{ lb}}\)
Appendix A: Emission Calculations
Fugitive Dust Emissions - Paved Roads

Company Name: Barletta Boat Company
Source Address: 51687 County Road 133, Bristol, IN 46507
Operating Permit No.: T039-40049-00807
Minor Source Modification No.: 039-43532-00807
Minor Permit Modification No.: 039-43547-00807
Reviewer: Alexandrea Neuzerling

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 Information (provided by source)

<table>
<thead>
<tr>
<th>Type</th>
<th>Maximum number of vehicles per day</th>
<th>Maximum trips per day (trip/day)</th>
<th>Total Weight driven per day (ton/day)</th>
<th>Maximum one-way distance (feet/trip)</th>
<th>Maximum one-way distance (mi/trip)</th>
<th>Maximum one-way miles (miles/day)</th>
<th>Maximum one-way miles (miles/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Vehicle (entering plant) (one-way trip)</td>
<td>50.0</td>
<td>1.0</td>
<td>50.0</td>
<td>10.0</td>
<td>0.152</td>
<td>7.6</td>
<td>2765.2</td>
</tr>
<tr>
<td>Vehicle (leaving plant) (one-way trip)</td>
<td>50.0</td>
<td>1.0</td>
<td>50.0</td>
<td>1.0</td>
<td>0.152</td>
<td>7.6</td>
<td>2765.2</td>
</tr>
<tr>
<td>Totals</td>
<td>100.0</td>
<td>550.0</td>
<td>15.2</td>
<td>5530.3</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Average Vehicle Weight Per Trip** = 5.5 tons/trip

**Average Miles Per Trip** = 0.15 miles/trip

**Unmitigated Emission Factor, \( Ef \)** = \( k \cdot (sL)^{0.91} \cdot (W)^{1.02} \)  

Equation 1 from AP-42 13.2.1

Where:
- \( k = 0.011 \)  
- \( W = 5.5 \) tons = average vehicle weight (provided by source)  
- \( sL = 9.7 \) g/m² = 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, \( E_{ext} \) =  \( Ef \cdot [1 - (p/4N)] \)  

Equation 2 from AP-42 13.2.1

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

**Unmitigated Emission Factor, \( Ef \)** = 0.495 lb/mile

**Mitigated Emission Factor, \( E_{ext} \)** = 0.453 lb/mile

### Process

<table>
<thead>
<tr>
<th>Process</th>
<th>Mitigated PTE of PM (Before Control) (tons/yr)</th>
<th>Mitigated PTE of PM10 (Before Control) (tons/yr)</th>
<th>Mitigated PTE of PM2.5 (Before Control) (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Vehicle (entering plant) (one-way trip)</td>
<td>0.63</td>
<td>0.13</td>
<td>0.03</td>
</tr>
<tr>
<td>Vehicle (leaving plant) (one-way trip)</td>
<td>0.63</td>
<td>0.13</td>
<td>0.03</td>
</tr>
<tr>
<td>Totals</td>
<td>1.25</td>
<td>0.25</td>
<td>0.06</td>
</tr>
</tbody>
</table>

**Methodology**

- Total Weight driven per day (ton/day) = [Maximum Weight Loaded (tons/trip)] * [Maximum trips per day (trip/day)]
- Maximum one-way distance (mi/trip) = [Maximum one-way distance (feet/trip)] / 5280 ft/mile
- 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)] * \( Ef \) (lb/mile) * (ton/2000 lbs)
- Mitigated PTE (Before Control) (tons/yr) = [Mitigated Emission Factor (lb/mile)] * (tons/2000 lbs)

**Abbreviations**

PM = Particulate Matter
PM10 = Particulate Matter (<10 um)
PM2.5 = Particle Matter (<2.5 um)
PTE = Potential to Emit
Gene Chastain  
Barletta Boat Company  
51687 County Road 133  
Bristol, IN 46507  

Re: Public Notice  
Barletta Boat Company  
Permit Level: Title V – Minor Permit Modification  
Permit Number: 039-43547-00807  

January 11, 2021

Dear Mr. Gene Chastain:

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/](http://www.in.gov/apps/idem/caats/) . Choose Search Option by Permit Number, then enter permit 43547

and

**IDEM's Virtual File Cabinet (VFC):** [http://www.IN.gov/idem](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](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 Bristol-Washington Township Public Library, 505 West Vistula Street in Bristol, IN 46507. 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 Alexandrea Neuzerling, 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 2-6634 or dial (317) 232-6634.

Sincerely,

Kathy Bourquein

Kathy Bourquein
Permits Branch
Office of Air Quality

Enclosures
PN Applicant Cover Letter access via website 8/10/2020
January 11, 2021

To: Bristol-Washington Township 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: Barletta Boat Company
Permit Number: 039-43547-00807

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 Smiddle-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
Notice of Public Comment

January 11, 2021
Barletta Boat Company
039-43547-00807

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
AFFECTED STATE NOTIFICATION OF PUBLIC COMMENT PERIOD
DRAFT INDIANA AIR PERMIT

January 11, 2021

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

Permit Number: 039-43547-00807
Applicant Name: Barletta Boat Company
Location: Bristol, 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

<table>
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<th>IDEM Staff</th>
<th>KBOURQUE</th>
<th>January 11, 2021</th>
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<th>AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING ONLY</th>
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<td>Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204</td>
<td>Type of Mail: CERTIFICATE OF MAILING ONLY</td>
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<th>S.H. Fee</th>
<th>Rest. Del. Fee</th>
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<tr>
<td>1</td>
<td></td>
<td>Gene Chastain Barletta Boat Company 51687 CR 133 Bristol IN 46507 (Source CAATS)</td>
<td></td>
<td></td>
<td></td>
<td></td>
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<tr>
<td>2</td>
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<td>Mike Kloska Chief Financial Officer (CFO) Barletta Boat Company 51687 CR 133 Bristol IN 46507 (RO CAATS)</td>
<td></td>
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<tr>
<td>3</td>
<td></td>
<td>Elkhart County Health Department 608 Oakland Avenue Elkhart IN 46516 (Health Department)</td>
<td></td>
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<tr>
<td>4</td>
<td></td>
<td>Bristol Town Council and Town Manager P.O. Box 305 Bristol IN 46507 (Local Official)</td>
<td></td>
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<td></td>
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<tr>
<td>5</td>
<td></td>
<td>Elkhart County Board of Commissioners 117 North Second St. Goshen IN 46526 (Local Official)</td>
<td></td>
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<tr>
<td>6</td>
<td></td>
<td>Bristol Washington Township Public Library 505 W Vistula St, PO Box 789 Bristol IN 46507-0789 (Library)</td>
<td></td>
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<td>7</td>
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<td>Polly Mishler D &amp; B Environmental Services, Inc. 401 Lincoln Way West Osceola IN 46561 (Consultant)</td>
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<td>Jeni Seely The Mail-Journal PO Box 188 Mifflin IN 46542 (Affected Party)</td>
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<td>9</td>
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<td>Mr. Roger Schneider The Goshen News 114 S. Main St Goshen IN 46526 (Affected Party)</td>
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**Total number of pieces Listed by Sender**: 15

**Total number of Pieces Received at Post Office**: 15

**Postmaster, Per (Name of Receiving employee)**: 

The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is $50,000 per piece subject to a limit of $50,000 per occurrence. The maximum indemnity payable on Express mail merchandise insurance is $500. The maximum indemnity payable is $25,000 for registered mail, sent with optional postal insurance. See *Domestic Mail Manual R900, S913, and S921* for limitations of coverage on insured and COD mail. See *International Mail Manual* for limitations on coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.