NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

Preliminary Findings Regarding a Significant Modification to a Part 70 Operating Permit for Highwater Marine, LLC, dba Godfrey Marine in Elkhart County

Significant Source Modification No.: 039-43777-00267
Significant Permit Modification No.: 039-43851-00267

The Indiana Department of Environmental Management (IDEM) has received an application from Highwater Marine, LLC, dba Godfrey Marine in Elkhart County, located at 4500 Middlebury Street, 4310 Middlebury Street, 631 Bullard Road, 630 Bullard Road, 651 Bullard Road, 720 CR 15, 4301 Bullard Road, and 4400 Middlebury Street, Elkhart, Indiana 46516, for a significant modification of its Part 70 Operating Permit issued on February 19, 2021. If approved by IDEM’s Office of Air Quality (OAQ), this proposed modification would allow Highwater Marine, LLC, dba Godfrey Marine in Elkhart County to make certain changes at its existing source. Highwater Marine, LLC, dba Godfrey Marine in Elkhart County has applied to modify the source and the permit in the following ways:

(a) Adding one (1) putty gun to each of the putty operations currently listed in Plant 2. The location of putty operation consisting of bonding and filling will be corrected from Plant 2 to Plant 6. The material used in each operation will be updated in the calculations attached as Appendix A to this TSD.

(b) Adding one spare (1) putty gun apparatus to each location as a part of the preventative maintenance program.

(c) Adding one (1) foam application process Section A.4 Insignificant Activities:

(d) Modifying the VOC limit of 144 tons per year to include the two (2) putty operations and the foam application process. The limit of 144 tons will not be changed, only the list of emission units included in the limit will change.

(e) Adding a new VOC limit for BAO-P2 to avoid the requirements of 326 IAC 8-1-6.

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:

Elkhart Public Library - Osolo Branch
3429 East Bristol Street
Elkhart, Indiana 46550

and
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: https://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/public-notices/) marks the beginning of a 30-day public comment period. If the 30th day of the comment period falls on a day when IDEM offices are closed for business, all comments must be postmarked or delivered in person on the next business day that IDEM is open.

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

Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so that you can be added to IDEM’s mailing list to receive notice of future action related to this permit. If you do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit number SSM 039-43777-00267 and SPM 039-43851-00267 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: https://www.in.gov/idem/airpermit/public-participation/; and the Citizens’ Guide to IDEM on the Internet at: https://www.in.gov/idem/resources/citizens-guide-to-idem/.
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, IDEM Northern Regional Office, 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
Collin McGann  
Highwater Marine, LLC, dba Godfrey Marine  
4500 Middlebury Street  
Elkhart, Indiana 46516  

Re: 039-43851-00267  
Significant Permit Modification

Dear Collin McGann:

Highwater Marine, LLC, dba Godfrey Marine was issued Part 70 Operating Permit Renewal No. T039-39228-00267 on May 19, 2018 for a stationary fiberglass and aluminum boat manufacturing source located at 4500 Middlebury Street, 4310 Middlebury Street, 631 Bullard Road, 630 Bullard Road, 651 Bullard Road, 720 CR 15, 4301 Bullard Road, and 4400 Middlebury Street, Elkhart, Indiana 46516. An application requesting changes to this permit was received on February 19, 2021. Pursuant to the provisions of 326 IAC 2-7-12, a Significant 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 this attachment has been provided in previously issued approvals for this source, IDEM OAQ has not included a copy of this attachment with this modification:


Previously issued approvals for this source containing this attachment 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: https://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: https://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/public-participation/; and the Citizens' Guide to IDEM on the Internet at: https://www.in.gov/idem/resources/citizens-guide-to-idem/.

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 Renewal
OFFICE OF AIR QUALITY

Highwater Marine, LLC., dba Godfrey Marine
4500 Middlebury Street, 4310 Middlebury Street, 631 Bullard Road,
630 Bullard Road, 651 Bullard Road, 720 CR 15, 4301 Bullard Road,
and 4400 Middlebury Street,
Elkhart, Indiana 46516

(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.
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Pollutants for Boat Manufacturing
SECTION A  SOURCE SUMMARY

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

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

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

Source Address: 4500 Middlebury Street, 4310 Middlebury Street, 631 Bullard Road, 630 Bullard Road, 651 Bullard Road, 720 CR 15, 4301 Bullard Road, and 4400 Middlebury Street, Elkhart, Indiana 46516

General Source Phone Number: 574-970-5104

SIC Code: 3732 (Boat Building and Repairing)

County Location: Elkhart

Source Location Status: Attainment for all criteria pollutants

Source Status: Part 70 Operating Permit Program

Minor Source, under PSD and Emission Offset Rules

Major Source, Section 112 of the Clean Air Act

Not 1 of 28 Source Categories

A.2 Part 70 Source Definition [326 IAC 2-7-1(22)]

This source consists of nine (9) plants:

(a) Plant 1 (PONTOON) is located at 4500 Middlebury Street, Elkhart, Indiana 46516;

(b) Plant 2 (HURRICANE ASSEMBLY) is located at 4310 Middlebury Street, Elkhart, Indiana 46516;

(c) Plant 3 (METAL FAB) is located at 631 Bullard Road, Elkhart, Indiana 46516;

(d) Plant 4 is located at 630 Bullard Road, Elkhart, Indiana 46516;

(e) Plant 5 is located on a private drive within the source complex, it does not have a physical address.

(f) Plant 6 (HURRICANE LAMINATION) is located at 720 CR 15, Elkhart, Indiana 46516;

(g) Plant 79 (SEWING)(LIPPERT) is located at 651 Bullard Road, Elkhart, Indiana 46516;

(h) Plant 79 (WOODSHOP)(LIPPERT) is located at 4301 Bullard Road, Elkhart, Indiana 46516;

(i) Plant 14 is located at 4400 Middlebury Street, Elkhart, Indiana 46516.

“Plant” in this case refers to building numbers. These nine plants are located on contiguous properties, have the same SIC codes and are under common control, therefore they will be considered one (1) source, as defined by 326 IAC 2-7-1(22).
The original source determination was referenced in the initial Part 70 operating permit T039-8962-00267, issued May 25, 2000. The source determination was revised under SSM 039-39230-00267, issued April 23, 2018, and Part 70 Renewal T039-39228-00267, issued May 10, 2018.

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

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

Plant 6

(a) One (1) fiberglass application area, identified as the General Lamination Department, consisting of the following components:

(1) One (1) gel coat booth, identified as GEL BOOTH 2, constructed in 2000 and approved for modification in 2018 to replace the spray guns with like kind spray guns, with a maximum capacity of 496 pounds of gel coat per hour, utilizing FIT nonatomized spray guns, using dry filters for particulate control, and exhausting to one (1) stack, identified as EF6-12;

(2) One (1) gel coat booth, identified as GEL BOOTH 1, constructed in 2000 and approved for modification in 2018 to replace the spray guns with like kind spray guns, with a maximum capacity of 496 pounds of gel coat per hour, utilizing FIT nonatomized spray guns, using dry filters for particulate control, and exhausting to one (1) stack, identified as EF6-13;

(3) One (1) fiberglass chop station, identified as 1st HULL CHOP, constructed in 1994 and approved for modification in 2018 to replace the spray guns with like kind spray guns, with a maximum capacity of 525 pounds of resin per hour, utilizing flow coating, equipped with dry filters, exhausting to seven (7) general room stacks identified as EF6-2 through EF6-8;

(4) One (1) fiberglass chop station, identified as 1st DECK CHOP, constructed in 1994 and approved for modification in 2018 to replace the spray guns with like kind spray guns, with a maximum capacity of 525 pounds of resin per hour, utilizing flow coating equipped with dry filters, exhausting to seven (7) general room stacks identified as EF6-2 through EF6-8;

(5) One (1) fiberglass chop station, identified as SMALL PRODUCTS CHOP, constructed in 1994 and modified in 2018 by replacing the spray guns with like kind spray guns, with a maximum capacity of 525 pounds of resin per hour, utilizing flow coating, equipped with dry filters, exhausting to seven (7) general room stacks identified as EF6-2 through EF6-8;

(6) One (1) fiberglass chop station, identified as 2nd DECK CHOP A, constructed in 1994 and modified in 2018 by replacing the spray guns with like kind spray guns, with a maximum capacity of 525 pounds of resin per hour, utilizing flow coating, equipped with dry filters, exhausting to seven (7) general room stacks identified as EF6-2 through EF6-8;

(7) One (1) fiberglass chop station, identified as 2nd DECK CHOP B, constructed in 1994 and approved for modification in 2018 to replace the spray guns with like kind spray guns, with a maximum capacity of 525 pounds of resin per hour, utilizing flow coating, equipped with dry filters, exhausting to seven (7) general room stacks identified as EF6-2 through EF6-8;
(8) One (1) fiberglass chop station, identified as PORTABLE CHOP, constructed in 1994 and approved for modification in 2018 to replace the spray guns with like kind spray guns, with a maximum capacity of 525 pounds of resin per hour, utilizing flow coating, equipped with dry filters, exhausting to seven (7) general room stacks identified as EF6-2 through EF6-8;

(9) One (1) fiberglass chop station, identified as BULK HULL CHOP, constructed in 1994 and approved for modification in 2018 to replace the spray guns with like kind spray guns, with a maximum capacity of 525 pounds of resin per hour, utilizing flow coating, equipped with dry filters, exhausting to seven (7) general room stacks identified as EF6-2 through EF6-8;

(10) One (1) fiberglass chop station, identified as STRINGER STATION 1 CHOP, constructed in 2000 and modified in 2018 by replacing the spray guns with like kind spray guns, with a maximum capacity of 525 pounds of resin per hour, utilizing flow coating, equipped with dry filters, exhausting to seven (7) general room stacks identified as EF6-2 through EF6-8;

(11) One (1) fiberglass chop station, identified as STRINGER STATION 2 CHOP, constructed in 2000 and approved for modification in 2018 to replace the spray guns with like kind spray guns, with a maximum capacity of 525 pounds of resin per hour, utilizing flow coating, equipped with dry filters, exhausting to seven (7) general room stacks identified as EF6-2 through EF6-8;

(12) One (1) bilge gel coat process station, identified as BILGE GEL 2, constructed in 2000 and approved for modification in 2018 to replace the spray guns with like kind spray guns, used to coat storage areas in the bow, stern and ski lockers, utilizing one (1) FIT nonatomized spray gun, with a maximum capacity of 1.3 units per hour and 413.33 pounds of gel coat per hour, using dry filters for particulate control, exhausting to one (1) stack, identified as EF6-9.

(13) One (1) bilge gel coat process station, identified as BILGE GEL 1, constructed in 2000, permitted in 2018 and approved for modification in 2018 to replace the spray guns with like kind spray guns, used to coat certain visible sections of the underside of the deck, utilizing one (1) FIT nonatomized spray gun, with a maximum capacity of 1.3 units per hour and 413.33 pounds of gel coat per hour, using dry filters for particulate control, exhausting to seven (7) general room stacks, identified as EF6-2 through EF6-8.

Under 40 CFR 63, Subpart VV, all above emission units, in item (a) are considered existing units in an existing affected source.

(b) Miscellaneous Activities, constructed in 2000, with a combined maximum capacity of 1 gallon per unit, no control and exhausting indoors:

(1) Spot repair/touch-up paint of steel and/or aluminum frame members using hand held spray cans;

(2) Spot repair/touch-up paint of fiberglass boats using hand held spray cans;

(3) Spot repair/touch-up gel coat of fiberglass boats and/or parts, with air-atomized spray guns.

(4) One (1) glue station utilizing a reactive adhesive that is applied by one (1) metered hand applicator.
Under 40 CFR 63, Subpart VVVV, all emission units (b)(3) and (4) are considered existing units in an existing affected source.

(c) Plant 6 Boat Assembly Operations, constructed in 1974, permitted in 2018, used for laminated hurricane boats, consisting of mold release, mold cleaner and curing agents, hand applied or using handheld spray cans, with maximum capacity of 28,597 pounds/year, no control, exhausting indoors.

Under 40 CFR 63, Subpart VVVV, emission unit above is considered an existing unit in an existing affected source.

(d) One (1) grinding booth, constructed in 2000, with a maximum capacity of 543 pounds of flange material processed per hour, equipped with dry filters for particulate matter control, exhausting inside facility.

(e) Two (2) woodworking machines, constructed in 2013, with a total maximum throughput of 729 pounds per hour, with one (1) integral baghouse collector for particulate matter control, exhausting inside the facility.

(f) One (1) CNC router woodworking machine, permitted in 2020, with a maximum capacity of 262.2 pounds per hour, using an integral baghouse as control, and exhausting indoors.

(g) One (1) assembly operation, identified as BAO-P6, constructed in 2000, permitted in 2018, approved in 2021 for modification, consisting of 2 operational putty guns for bonding and filling, no control, exhausting indoors.

The 2021 modification is to add a second operational putty gun and a backup putty gun and to relocate from Plant 2 to Plant 6.

One (1) short term back up putty gun apparatus will be kept in storage and will be used to temporarily replace either of the operational putty guns that might need to be taken offline for the purpose of repairing or performing maintenance on either of the operational putty guns.

Under 40 CFR 63, Subpart VVVV, all emission units are considered existing units in an existing affected source.

Plant 79

(a) Four (4) woodworking machines, constructed in 2000, with a total maximum throughput of 729 pounds per hour, with one (1) integral baghouse collector for particulate matter control, exhausting inside the facility.

(b) One (1) woodworking machine, constructed in 2000, permitted in 2018, with a total maximum throughput of 145.8 pounds per hour, with (1) integral baghouse collector for particulate control, exhausting inside the facility.

(c) Lippert Adhesives marine furniture assembly area, consisting of thirty-one (31) adhesive application stations, identified as ES1 through ES31, constructed in 1974, modified in 2016, permitted in 2018, each with a maximum throughput of 1.45 units per hour and a maximum 0.06 gallons of adhesive per hour, utilizing HVLP spray guns, no control and exhausting indoors.

Under 40 CFR 63, Subpart VVVV, emission unit above is considered an existing unit in an existing affected source.
Plant 2

(1) One (1) assembly operation, identified as BAO-P2, constructed in 2000, approved in 2021 to add a second putty gun, with a maximum capacity of 1 unit per hour and 0.16 gallon per unit, utilizing one (1) portable glue gun and two (2) putty guns using polyester putty for caulking, hand held guns using urethane caulks and silicone sealants, and spray cans of adhesive, with a maximum capacity of 76,356 pounds/year, no control and exhausting indoors.

One (1) short term back up putty gun apparatus will be kept in storage and will be used to temporarily replace either of the operational putty guns that might need to be taken offline for the purpose of repairing or performing maintenance on either of the operational putty guns.

Under 40 CFR 63, Subpart VVVV, all emission units are considered existing units in an existing affected source.

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

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

(a) Plant 1 Boat Assembly Operations, constructed in 2000, permitted in 2018, used for sealing and finishing Pontoon boats, all hand applied during assembly process, no control, exhausting indoors, consisting of caulking, cleaning, degreasing, protecting and touch-up, with a maximum capacity of 523,818 pounds/year, as well as the following water based adhesive processes:

(1) One (1) vinyl floor roll-on station, located in Plant 1;
(2) One (1) carpeting roll-on station, located in Plant 1; and
(3) One (1) carpet adhesive roll-on station and one (1) vinyl adhesive roll-on station, located in Plant 1.

Under 40 CFR 63, Subpart VVVV, all above emission units are considered existing units in an existing affected source.

(b) Plant 3 Boat Assembly Operations, constructed in 2014, permitted in 2018, consisting of spot repair/touch-up paint of steel and/or aluminum frame members using hand held spray paint cans, with a maximum capacity of 107 pounds/year, no control, exhausting indoors

Under 40 CFR 63, Subpart VVVV, all emission units in this section are considered existing units in an existing affected source.

(c) Welding operations, consisting of the following:

(1) Plant 1:
   (i) Fifteen (15) MIG welding units;
   (ii) Ten (10) TIG welding units; and,
   (iii) Two (2) seam welders, permitted in 2018.

(2) Plant 3:
   (i) Three (3) MIG welding units; and,
   (ii) Twelve (12) TIG welding units.
(3) Plant 6:
   (i) One (1) MIG welding unit.

(d) Natural gas-fired combustion unit space heaters, consisting of the following:

<table>
<thead>
<tr>
<th>Unit</th>
<th>Unit Capacity (MMBtu/hr)</th>
<th>Identical Units</th>
<th>Total Capacity (MMBtu/hr)</th>
<th>Construction Date</th>
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<tr>
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<tr>
<td>Plant 14</td>
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<td>Water Heater</td>
<td>0.04</td>
<td>3</td>
<td>0.12</td>
<td>2000</td>
</tr>
</tbody>
</table>

(e) One (1) foam application located in Plant 6, approved in 2021 for construction, with a maximum capacity of two tenths (0.20) gallon per hour, using no controls, and exhausting indoors.

Under 40 CFR 63, Subpart VVVV, all emission units are considered existing units in an existing affected source.

A.5 Part 70 Permit Applicability [326 IAC 2-7-2]

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

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

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).
SECTION B  GENERAL CONDITIONS

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

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

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

(a) This permit, T039-39228-00267, 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.3 Term of Conditions [326 IAC 2-1.1-9.5]

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

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

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

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

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

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

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

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

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

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

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

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

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

(a) A certification required by this permit meets the requirements of 326 IAC 2-7-6(1) if:
(1) it contains a certification by a "responsible official" as defined by 326 IAC 2-7-1(35), and

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

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

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

B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]

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

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

and

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

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, 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.10 Preventive Maintenance Plan [326 IAC 2-7-5(12)][326 IAC 1-6-3]

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

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

The Permittee shall implement the PMPs.

(b) If required by specific condition(s) in Section D of this permit where no PMP was previously required, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:

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

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

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

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

The Permittee shall implement the PMPs.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).
(d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.11 Emergency Provisions [326 IAC 2-7-16]

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

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

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

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

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

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

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

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

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

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

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

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and
(C) Corrective actions taken.

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

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

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

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

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

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

(g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

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

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

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

(b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
(c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

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

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

2. The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

3. The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and

4. The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

(e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

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

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

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

(a) All terms and conditions of permits established prior to T039-39228-00267 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 permit, all previous registrations and permits are superseded by this Part 70 operating permit.

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

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

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)][326 IAC 2-7-8(a)][326 IAC 2-7-9]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-
5(6)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

(1) That this permit contains a material mistake.

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

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

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

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

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

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

Request for renewal shall be submitted to:

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

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

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

(2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the 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
B.17  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.18 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)][326 IAC 2-7-12(b)(2)]

(a) No Part 70 permit revision or notice shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

(b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.19 Operational Flexibility [326 IAC 2-7-20][326 IAC 2-7-10.5]

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

1. The changes are not modifications under any provision of Title I of the Clean Air Act;
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:
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.20 Source Modification Requirement [326 IAC 2-7-10.5]
A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2.

B.21 Inspection and Entry [326 IAC 2-7-6][IC 13-14-2-2][IC 13-30-3-1][IC 13-17-3-2]
Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
(b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;
(c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
(d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
(e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.22 Transfer of Ownership or Operational Control [326 IAC 2-7-11]
(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).
(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]
B.23 Annual Fee Payment [326 IAC 2-7-19][326 IAC 2-7-5(7)][326 IAC 2-1.1-7]

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

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

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

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

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

- **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.**

- **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 Stack Height [326 IAC 1-7]

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

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

- **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.8 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.9 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.10 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)][326 IAC 3-8]

(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
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.11 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.

C.12 Emergency Reduction Plans [326 IAC 1-5-2][326 IAC 1-5-3]

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

(a) The Permittee shall maintain the most recently submitted written emergency reduction plans (ERPs) consistent with safe operating procedures.

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

C.13 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.14 Response to Excursions or Exceedances [326 IAC 3-8][326 IAC 2-7-5][326 IAC 2-7-6]

(I) 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
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.15 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.16 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:
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.17 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 DD The analytical techniques or methods used.

(EE) The results of such analyses.

(FF) The operating conditions as existing at the time of sampling or measurement.

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

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

C.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)][326 IAC 2-1.1-11][326 IAC 3-8]

(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) 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.19 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 6

(a) One (1) fiberglass application area, identified as the General Lamination Department, consisting of the following components:

(1) One (1) gel coat booth, identified as GEL BOOTH 2, constructed in 2000 and approved for modification in 2018 to replace the spray guns with like kind spray guns, with a maximum capacity of 496 pounds of gel coat per hour, utilizing FIT nonatomized spray guns, using dry filters for particulate control, and exhausting to one (1) stack, identified as EF6-12;

(2) One (1) gel coat booth, identified as GEL BOOTH 1, constructed in 2000 and approved for modification in 2018 to replace the spray guns with like kind spray guns, with a maximum capacity of 496 pounds of gel coat per hour, utilizing FIT nonatomized spray guns, using dry filters for particulate control, and exhausting to one (1) stack, identified as EF6-13;

(3) One (1) fiberglass chop station, identified as 1st HULL CHOP, constructed in 1994 and approved for modification in 2018 to replace the spray guns with like kind spray guns, with a maximum capacity of 525 pounds of resin per hour, utilizing flow coating, equipped with dry filters, exhausting to seven (7) general room stacks, identified as EF6-2 through EF6-8;

(4) One (1) fiberglass chop station, identified as 1st DECK CHOP, constructed in 1994 and approved for modification in 2018 to replace the spray guns with like kind spray guns, with a maximum capacity of 525 pounds of resin per hour, utilizing flow coating, equipped with dry filters, exhausting to seven (7) general room stacks identified as EF6-2 through EF6-8;

(5) One (1) fiberglass chop station, identified as SMALL PRODUCTS CHOP, constructed in 1994 and modified in 2018 by replacing the spray guns with like kind spray guns, with a maximum capacity of 525 pounds of resin per hour, utilizing flow coating, equipped with dry filters, exhausting to seven (7) general room stacks identified as EF6-2 through EF6-8;

(6) One (1) fiberglass chop station, identified as 2nd DECK CHOP A, constructed in 1994 and modified in 2018 by replacing the spray guns with like kind spray guns, with a maximum capacity of 525 pounds of resin per hour, utilizing flow coating, equipped with dry filters, exhausting to seven (7) general room stacks identified as EF6-2 through EF6-8;

(7) One (1) fiberglass chop station, identified as 2nd DECK CHOP B, constructed in 1994 and approved for modification in 2018 to replace the spray guns with like kind spray guns, with a maximum capacity of 525 pounds of resin per hour, utilizing flow coating, equipped with dry filters, exhausting to seven (7) general room stacks identified as EF6-2 through EF6-8;

(8) One (1) fiberglass chop station, identified as PORTABLE CHOP, constructed in 1994 and approved for modification in 2018 to replace the spray guns with like kind spray guns, with a maximum capacity of 525 pounds of resin per hour, utilizing flow coating,
equipped with dry filters, exhausting to seven (7) general room stacks identified as EF6-2 through EF6-8;

(9) One (1) fiberglass chop station, identified as BULK HULL CHOP, constructed in 1994 and approved for modification in 2018 to replace the spray guns with like kind spray guns, with a maximum capacity of 525 pounds of resin per hour, utilizing flow coating, equipped with dry filters, exhausting to seven (7) general room stacks identified as EF6-2 through EF6-8;

(10) One (1) fiberglass chop station, identified as STRINGER STATION 1 CHOP, constructed in 2000 and modified in 2018 by replacing the spray guns with like kind spray guns, with a maximum capacity of 525 pounds of resin per hour, utilizing flow coating, equipped with dry filters, exhausting to seven (7) general room stacks identified as EF6-2 through EF6-8;

(11) One (1) fiberglass chop station, identified as STRINGER STATION 2 CHOP, constructed in 2000 and approved for modification in 2018 to replace the spray guns with like kind spray guns, with a maximum capacity of 525 pounds of resin per hour, utilizing flow coating, equipped with dry filters, exhausting to seven (7) general room stacks identified as EF6-2 through EF6-8;

(12) One (1) bilge gel coat process station, identified as BILGE GEL 2, constructed in 2000 and approved for modification in 2018 to replace the spray guns with like kind spray guns, used to coat storage areas in the bow, stern and ski lockers, utilizing one (1) FIT nonatomized spray gun, with a maximum capacity of 1.3 units per hour and 413.33 pounds of gel coat per hour, using dry filters for particulate control, exhausting to one (1) stack, identified as EF6-9.

(13) One (1) bilge gel coat process station, identified as BILGE GEL 1, constructed in 2000, permitted in 2018 and approved for modification in 2018 to replace the spray guns with like kind spray guns, used to coat certain visible sections of the underside of the deck, utilizing one (1) FIT nonatomized spray gun, with a maximum capacity of 1.3 units per hour and 413.33 pounds of gel coat per hour, using dry filters for particulate control, exhausting to seven (7) general room stacks, identified as EF6-2 through EF6-8.

Under 40 CFR 63, Subpart VVVV, all above emission units, in item (a) are considered existing units in an existing affected source.

(b) Miscellaneous Activities, constructed in 2000, with a combined maximum capacity of 1 gallon per unit, no control and exhausting indoors:

(1) Spot repair/touch-up paint of steel and/or aluminum frame members using hand held spray cans;

(2) Spot repair/touch-up paint of fiberglass boats using hand held spray cans;

(3) Spot repair/touch-up gel coat of fiberglass boats and/or parts, with air-atomized spray guns.

(4) One (1) glue station utilizing a reactive adhesive that is applied by one (1) metered hand applicator.

Under 40 CFR 63, Subpart VVVV, all emission units (b)(3) and (4) are considered existing units in an existing affected source.
(c) **Plant 6 Boat Assembly Operations**, constructed in 1974, permitted in 2018, used for laminated hurricane boats, consisting of mold release, mold cleaner and curing agents, hand applied or using handheld spray cans, with maximum capacity of 28,597 pounds/year, no control, exhausting indoors.

Under 40 CFR 63, Subpart VVVV, emission unit above is considered an existing unit in an existing affected source.

(g) One (1) assembly operation, identified as BAO-P6, constructed in 2000, permitted in 2018, approved in 2021 for modification, consisting of 2 operational putty guns for bonding and filling, no control, exhausting indoors.

The 2021 modification is to add a second operational putty gun and a backup putty gun and to relocate from Plant 2 to Plant 6.

One (1) short term back up putty gun apparatus will be kept in storage and will be used to temporarily replace either of the operational putty guns that might need to be taken offline for the purpose of repairing or performing maintenance on either of the operational putty guns.

Under 40 CFR 63, Subpart VVVV, all emission units are considered existing units in an existing affected source.

**Plant 79**

(c) **Lippert Adhesives marine furniture assembly area**, consisting of thirty-one (31) adhesive application stations, identified as ES1 through ES31, constructed in 1974, modified in 2016, permitted in 2018, each with a maximum throughput of 1.45 units per hour and a maximum 0.06 gallons of adhesive per hour, utilizing HVLP spray guns, no control and exhausting indoors.

Under 40 CFR 63, Subpart VVVV, emission unit above is considered an existing unit in an existing affected source.

**Plant 2**

(a) One (1) assembly operation, identified as BAO-P2, constructed in 2000, approved in 2021 to add a second putty gun, with a maximum capacity of 1 unit per hour and 0.16 gallon per unit, utilizing one (1) portable glue gun and two (2) putty guns using polyester putty for caulking, hand held guns using urethane caulks and silicone sealants, and spray cans of adhesive, with a maximum capacity of 76,356 pounds/year, no control and exhausting indoors.

One (1) short term back up putty gun apparatus will be kept in storage and will be used to temporarily replace either of the operational putty guns that might need to be taken offline for the purpose of repairing or performing maintenance on either of the operational putty guns.

Under 40 CFR 63, Subpart VVVV, all emission units are considered existing units in an existing affected source.

**Insignificant Activities:**

(a) **Plant 1 Boat Assembly Operations**, constructed in 2000, permitted in 2018, used for sealing and finishing Pontoon boats, all hand applied during assembly process, no control, exhausting indoors, consisting of caulking, cleaning, degreasing, protecting and touch-up, with a maximum capacity of 523,818 pounds/year, as well as the following water based adhesive processes:
(1) One (1) vinyl floor roll-on station, located in Plant 1;

(2) One (1) carpeting roll-on station, located in Plant 1; and

(3) One (1) carpet adhesive roll-on station and one (1) vinyl adhesive roll-on station, located in Plant 1.

Under 40 CFR 63, Subpart VVVV, all above emission units are considered existing units in an existing affected source.

(b) Plant 3 Boat Assembly Operations, constructed in 2014, permitted in 2018, consisting of spot repair/touch-up paint of steel and/or aluminum frame members using hand held spray paint cans, with a maximum capacity of 107 pounds/year, no control, exhausting indoors

Under 40 CFR 63, Subpart VVVV, all emission units in this section are considered existing units in an existing affected source.

(e) One (1) foam application located in Plant 6, approved in 2021 for construction, with a maximum capacity of two tenths (0.20) gallon per hour, using no controls, and exhausting indoors.

Under 40 CFR 63, Subpart VVVV, all emission units are considered existing units in an existing affected source.

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

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

D.1.1 Prevention of Significant Deterioration (PSD Minor Limit) VOC, PM, PM10 and PM2.5 [326 IAC 2-2]

In order to render 326 IAC 2-2 not applicable, the Permittee shall comply with the following:

(a)

(1) The use of resins and gel coats in the following facilities in Plant 6:

<table>
<thead>
<tr>
<th>Plant 6 Unit type</th>
<th>Unit ID</th>
</tr>
</thead>
<tbody>
<tr>
<td>gel coat booth</td>
<td>GEL BOOTH 2</td>
</tr>
<tr>
<td>gel coat booth</td>
<td>GEL BOOTH 1</td>
</tr>
<tr>
<td>fiberglass chop station</td>
<td>1st HULL CHOP</td>
</tr>
<tr>
<td>fiberglass chop station</td>
<td>1st DECK CHOP</td>
</tr>
<tr>
<td>fiberglass chop station</td>
<td>SMALL PRODUCTS CHOP</td>
</tr>
<tr>
<td>fiberglass chop station</td>
<td>2nd DECK CHOP A</td>
</tr>
<tr>
<td>fiberglass chop station</td>
<td>2nd DECK CHOP B</td>
</tr>
<tr>
<td>fiberglass chop station</td>
<td>PORTABLE CHOP</td>
</tr>
<tr>
<td>fiberglass chop station</td>
<td>BULK HULL CHOP</td>
</tr>
<tr>
<td>fiberglass chop station</td>
<td>STRINGER STATION 1 CHOP</td>
</tr>
<tr>
<td>fiberglass chop station</td>
<td>STRINGER STATION 2 CHOP</td>
</tr>
<tr>
<td>bilge gel coat process station</td>
<td>BILGE GEL 2</td>
</tr>
<tr>
<td>bilge gel coat process station</td>
<td>BILGE GEL 1</td>
</tr>
</tbody>
</table>

(2) The use of putty and foam materials in the following facilities:
shall be limited such that the PTE of VOC shall not exceed one hundred and forty-four (144) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

(b) The use of gel coats shall be limited such that the combined total PTE of VOC from the following:

<table>
<thead>
<tr>
<th>Plant 6 Unit type</th>
<th>Unit ID</th>
</tr>
</thead>
<tbody>
<tr>
<td>bilge gel coat process station</td>
<td>BILGE GEL 2</td>
</tr>
<tr>
<td>bilge gel coat process station</td>
<td>BILGE GEL 1</td>
</tr>
</tbody>
</table>

shall not exceed 15 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

(c) The PM, PM\textsubscript{10}, PM\textsubscript{2.5} emissions rates shall be limited as follows:

<table>
<thead>
<tr>
<th>Plant 6 Unit type</th>
<th>Unit ID</th>
<th>PM\textsubscript{lb/hr}</th>
<th>PM\textsubscript{10}\textsubscript{lb/hr}</th>
<th>PM\textsubscript{2.5}\textsubscript{lb/hr}</th>
</tr>
</thead>
<tbody>
<tr>
<td>gel coat booth</td>
<td>GEL BOOTH 2</td>
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<td>3.59</td>
<td>3.59</td>
</tr>
<tr>
<td>gel coat booth</td>
<td>GEL BOOTH 1</td>
<td>3.59</td>
<td>3.59</td>
<td>3.59</td>
</tr>
<tr>
<td>bilge gel coat process station</td>
<td>BILGE GEL 2</td>
<td>7.14</td>
<td>7.14</td>
<td>7.14</td>
</tr>
<tr>
<td>bilge gel coat process station</td>
<td>BILGE GEL 1</td>
<td>2.98</td>
<td>2.98</td>
<td>2.98</td>
</tr>
</tbody>
</table>

Compliance with these limitations, combined with the limited potential to emit from other emission units at this source, shall limit the source-wide total potential to emit VOC, PM, PM\textsubscript{10}, and PM\textsubscript{2.5} to less than 250 tons per 12 consecutive month period and shall 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

Additionally, compliance with the limit in Condition D.1.1(b) shall limit the VOC emissions from the Bilge gel coat process stations (BILGE GEL 2, BILGE GEL 1) to less than twenty-five (25) tons per twelve (12) consecutive month period and shall render 326 IAC 2-2 PSD and 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities) not applicable to the two (2) bilge gel coat process stations.

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

(a) Pursuant to Part 70 Operating Permit No. T039-8962-00267, issued on March 31, 2000, and the Significant Source Modification No. 039-12158-00267, issued on August 9, 2000, and 326 IAC 8-1-6, Best Available Control Technology for the gel coat booths and fiberglass chop stations located in the General Lamination Department, consisting of:

<table>
<thead>
<tr>
<th>Plant 6 Unit type</th>
<th>Unit ID</th>
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</thead>
<tbody>
<tr>
<td>gel coat booth</td>
<td>GEL BOOTH 2</td>
</tr>
<tr>
<td>gel coat booth</td>
<td>GEL BOOTH 1</td>
</tr>
<tr>
<td>fiberglass chop station</td>
<td>1st HULL CHOP</td>
</tr>
<tr>
<td>fiberglass chop station</td>
<td>1st DECK CHOP</td>
</tr>
<tr>
<td>fiberglass chop station</td>
<td>SMALL PRODUCTS CHOP</td>
</tr>
<tr>
<td>fiberglass chop station</td>
<td>2nd DECK CHOP A</td>
</tr>
<tr>
<td>fiberglass chop station</td>
<td>2nd DECK CHOP B</td>
</tr>
<tr>
<td>Plant 6 Unit type</td>
<td>Unit ID</td>
</tr>
<tr>
<td>-----------------------------------</td>
<td>----------------------------</td>
</tr>
<tr>
<td>fiberglass chop station</td>
<td>PORTABLE CHOP</td>
</tr>
<tr>
<td>fiberglass chop station</td>
<td>BULK HULL CHOP</td>
</tr>
<tr>
<td>fiberglass chop station</td>
<td>STRINGER STATION 1 CHOP</td>
</tr>
<tr>
<td>fiberglass chop station</td>
<td>STRINGER STATION 2 CHOP</td>
</tr>
</tbody>
</table>

shall comply with the following:

(1) Use of resins and gel coats shall be limited such that the potential to emit (PTE) of volatile organic compounds emissions shall be less than 220 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

(2) The total monomer contents of all resins and gel coats used shall be limited to the following:

(A) 35% by weight for resins, and
(B) 37% by weight for gel coats or their equivalent on an emissions mass basis.

Monomer contents shall be calculated on a neat basis, i.e., excluding any filler.

Compliance with these monomer content limits shall be demonstrated on a monthly basis.

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

Equivalent emissions mass basis =

\[
\begin{align*}
& (\text{Emissions from } >35\% \text{ resin or } >37\% \text{ gel coat}) \\
& - (\text{Emissions from } 35\% \text{ resin or } 37\% \text{ gel coat}) \\
& \leq (\text{Emissions from } 35\% \text{ resin or } 37\% \text{ gel coat}) \\
& - (\text{Emissions from } <35\% \text{ resin, } <37\% \text{ gel coat, and/or other emission reduction techniques}).
\end{align*}
\]

Where:

Emissions in lb or ton = \( M \) (mass of resin or gel coat used, lb or ton)

\[ \text{EF} \] (Monomer emission factor for resin or gel coat used, %);

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

(3) Flow coaters, a type of non-spray application technology of a design and specifications to be approved by IDEM, OAQ, shall be used at all times to apply unfilled and filled resins.
(4) Optimized spray technology approved by IDEM shall be used at all times to apply gel coats and filled resins. Optimized spray techniques include, but are not limited to, the use of airless, air-assisted airless, high volume low pressure (HVLP), or other spray applicators demonstrated to the satisfaction of IDEM, OAQ, to be equivalent to the spray applicators listed above.

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

(5) A one (1) quart, air atomized spray gun may be used as needed for touch up purposes only.

(6) The listed work practices shall be followed:

(A) To the extent possible, a non-VOC, non-HAP solvent shall be used for cleanup.

(B) For solvents that are VOC:

(i) Cleanup solvent containers used to transport solvent from drums to work stations shall be closed containers having soft gasketed spring-loaded closures.

(ii) Cleanup rags saturated with solvent shall be stored, transported, and disposed of in containers that are closed tightly.

(iii) The spray guns used shall be the type that can be cleaned without the need for spraying the solvent into the air.

(iv) All solvent sprayed during cleanup or resin changes shall be directed into containers. Such containers shall be closed when not in use. The waste solvent shall be handled in such a manner that evaporation is minimized, and managed in accordance with applicable solid or hazardous waste requirements.

(v) Storage containers shall be kept covered when not in use.

D.1.3 Emission Standards for Hazardous Air Pollutants for Boat Manufacturing [326 IAC 20-48]

Pursuant to 326 IAC 20-48, the Permittee shall comply with the following for the emission units listed above in Section D.1:

(a) Pursuant to 326 IAC 20-48-2 (Alternative Organic HAP Content Requirements for Open Molding Gel Coat Operations), in addition to the alternative organic HAP content requirements for open molding resin operations contained in Table 2 to Subpart VVVV, 40 CFR 63, the alternative HAP content requirements for gel coat operations are as follows:
Gel Coat Application

<table>
<thead>
<tr>
<th>For this operation</th>
<th>and this application method</th>
<th>You must not exceed this weighted-average percent organic HAP content (weight percent) requirement</th>
</tr>
</thead>
<tbody>
<tr>
<td>Pigmented gel coat operations</td>
<td>Atomized (spray)</td>
<td>33 percent</td>
</tr>
<tr>
<td>Clear gel coat operations</td>
<td>Atomized (spray)</td>
<td>48 percent</td>
</tr>
<tr>
<td>Tooling gel coat operations</td>
<td>Atomized (spray)</td>
<td>40 percent</td>
</tr>
<tr>
<td>Pigmented gel coat operations</td>
<td>Nonatomized (nonspray)</td>
<td>40 percent</td>
</tr>
<tr>
<td>Clear gel coat operations</td>
<td>Nonatomized (nonspray)</td>
<td>55 percent</td>
</tr>
<tr>
<td>Tooling gel coat operations</td>
<td>Nonatomized (nonspray)</td>
<td>54 percent</td>
</tr>
</tbody>
</table>

(b) Pursuant to 326 IAC 20-48-3 (Work Practice Standards), in addition to 40 CFR 63.5731 and 40 CFR 63.5734(b), the following work practice standards are required:

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.
   - (C) Waste resins and gel coats that contain HAPs.
   - (D) Cleaning materials, including waste cleaning materials.
   - (E) Other materials 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.

(c) Pursuant to 326 IAC 20-48-4 (Operator Training), 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:
1. All personnel hired shall be trained within fifteen (15) days of hiring.

2. To ensure training goals listed in subsection (b) are maintained, all personnel shall be given refresher training annually.

3. 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.

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

1. Appropriate application techniques.
2. Appropriate equipment cleaning procedures.
3. Appropriate equipment setup and adjustment to minimize material usage and overspray.

The owner or operator shall maintain the following training records on site and available for inspection and review:

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

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

D.1.4 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(d), particulate emissions from the following:

<table>
<thead>
<tr>
<th>Plant 6 Unit type</th>
<th>Unit ID</th>
</tr>
</thead>
<tbody>
<tr>
<td>gel coat booth</td>
<td>GEL BOOTH 2</td>
</tr>
<tr>
<td>gel coat booth</td>
<td>GEL BOOTH 1</td>
</tr>
<tr>
<td>bilge gel coat process station</td>
<td>BILGE GEL 2</td>
</tr>
<tr>
<td>bilge gel coat process station</td>
<td>BILGE GEL 1</td>
</tr>
</tbody>
</table>

shall be controlled by dry particulate filters and the Permittee shall operate the control devices in accordance with manufacturer’s specifications.

Compliance with this shall also limit the source-wide total potential to emit, PM, PM$_{10}$, and PM$_{2.5}$ to less than 250 tons per 12 consecutive month period and shall 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.1.5 VOC Emission Limitation [326 IAC 8-1-6]

In order to render the requirements of 326 IAC 8-1-6 not applicable, Permittee shall comply with the following:

1. the putty compound input to the Plant 2 assembly operation (BAO-P2) shall not exceed 19,500 gallons per twelve (12) consecutive month period, with compliance determined at the end of each month.
(2) the VOC content of the input putty compound shall not exceed 2.56 pounds per gallon of putty compound.

Compliance with this limit shall limit the potential to emit of VOC to less than twenty-five (25) tons per twelve (12) consecutive month period from BAO-P2 and shall render the requirements of 326 IAC 8-1-6 not applicable to BAO-P2.

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

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

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

D.1.7 Volatile Organic Compounds [326 IAC 8-1-6]

Compliance with Conditions D.1.1, D.1.2, D.1.3 and D.1.5 shall be determined based upon the following criteria:

(a) Compliance with the VOC content and usage limitations contained in Conditions D.1.1, D.1.2 and D.1.5 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” and “as applied” VOC data sheets or SDS. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

(b) Monthly usage by weight, weight percent content of all monomers that are VOCs, method of application, and other emission reduction techniques for each gel coat and resin shall be recorded.

Volatile organic HAP emissions shall be calculated by multiplying the usage of each gel coat and resin by the emission factor that is appropriate for the content of each monomer, method of application, and other emission reduction techniques for each gel coat and resin, and summing the emissions for all gel coats and resins.

Emission factors shall be obtained from the reference approved by IDEM, OAQ.

(c) Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA-approved form, emission factors shall be taken from the following reference approved by IDEM, OAQ: “Unified Emission Factors for Open Molding of Composites, July 23, 2001.

The emission factors used for monomers that is styrene shall not exceed 32.3% styrene emitted per weight of gel coat applied and 17.7% styrene emitted per weight of resin applied. For the purposes of these emission calculations, monomer in resins and gel coats that is not styrene or methylmethacrylate shall be considered as styrene on an equivalent weight basis.

D.1.8 Particulate Control

In order to comply with Conditions D.1.2(c) and D.1.4, and to render 326 IAC 2-2 not applicable, the Permittee shall operate the dry filters at all times when one or more of the following are in operations:

<table>
<thead>
<tr>
<th>Plant 6 Unit type</th>
<th>Unit ID</th>
</tr>
</thead>
<tbody>
<tr>
<td>gel coat booth</td>
<td>GEL BOOTH 2</td>
</tr>
<tr>
<td>gel coat booth</td>
<td>GEL BOOTH 1</td>
</tr>
</tbody>
</table>
Compliance Monitoring Requirements [326 IAC 2-7-5(1)][326 IAC 2-7-6(1)]

D.1.9 Monitoring

The Permittee shall comply with the following:

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the stacks EF6-12, EF6-13, EF6-9, and EF6-2 through EF6-8 while one or more of the following are in operation.

<table>
<thead>
<tr>
<th>Plant 6 Unit type</th>
<th>Unit ID</th>
</tr>
</thead>
<tbody>
<tr>
<td>bilge gel coat process station</td>
<td>BILGE GEL 2</td>
</tr>
<tr>
<td>bilge gel coat process station</td>
<td>BILGE GEL 1</td>
</tr>
</tbody>
</table>

If a condition exists which should result in a response step, 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 the stacks EF6-12, EF6-13, EF6-9, and EF6-2 through EF6-8, 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 reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee’s obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

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

D.1.10 Record Keeping Requirements

(a) To document compliance with Conditions D.1.1, D.1.2, and D.1.5, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC, PM, PM_{10}, and PM_{2.5} emission limits established in Conditions D.1.1, D.1.2, and D.1.5.

(1) The amount and VOC content of each resin, gelcoat, solvent, putty, and foam used. Records shall include purchase orders, invoices, and safety data sheets (SDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the dates of use;

(3) The cleanup solvent usage for each month;

(4) The total VOC usage for each month;
(5) The weight of VOC emitted for each compliance period; and

(b) To document the compliance status with Condition D.1.9, the Permittee shall maintain a log of weekly overspray observations, and daily inspections. The Permittee shall include in its daily record when a weekly observation, daily or monthly inspection is not taken and the reason for the lack of observations and inspections, (i.e. the process did not operate that day).

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

D.1.11 Reporting Requirements

A quarterly summary of the information to document the compliance status with Conditions D.1.1, D.1.2, and D.1.5 shall be submitted using the reporting forms located at the end of this permit, or their equivalent, not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting Requirements contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).
SECTION D.2  EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Plant 6

(d) One (1) grinding booth, constructed in 2000, with a maximum capacity of 543 pounds of flange material processed per hour, equipped with dry filters for particulate matter control, exhausting inside facility.

(e) Two (2) woodworking machines, constructed in 2013, with a total maximum throughput of 729 pounds per hour, with one (1) integral baghouse collector for particulate matter control, exhausting inside the facility.

(f) One (1) CNC router woodworking machine, permitted in 2020, with a maximum capacity of 262.2 pounds per hour, using an integral baghouse as control, and exhausting indoors.

Plant 79

(a) Four (4) woodworking machines, constructed in 2000, with a total maximum throughput of 729 pounds per hour, with one (1) integral baghouse collector for particulate matter control, exhausting inside the facility.

(b) One (1) woodworking machine, constructed in 2000, permitted in 2018, with a total maximum throughput of 145.8 pounds per hour, with (1) integral baghouse collector for particulate control, exhausting inside the facility.

Insignificant Activities:

(c) Welding operations, consisting of the following:

(1) Plant 1:
   (i) Fifteen (15) MIG welding units;
   (ii) Ten (10) TIG welding units; and,
   (iii) Two (2) seam welders, permitted in 2018.

(2) Plant 3:
   (i) Three (3) MIG welding units; and,
   (ii) Twelve (12) TIG welding units.

(3) Plant 6:
   (i) One (1) MIG welding unit.

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

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

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

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the following units when operating at the following process weight rates shall not exceed the following limits:
Emission Units | Plant ID | Process Weight Rates (Pounds/Hour) | Limits (Pounds/Hour)
--- | --- | --- | ---
One (1) Grinding booth | Plant 6 | 543 | 1.71
Two (2) Woodworking machines | Plant 6 | 729 | 2.09 (Combined)
Four (4) Woodworking machines | Plant 79 | 729 | 2.09 (Combined)
One (1) Woodworking machine, constructed in 2000, permitted in 2018 | Plant 79 | 145.8 | 0.71

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

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

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

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

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

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

D.2.3 Particulate Control

(a) In order to comply with Condition D.2.1, the dry filters for particulate control from the grinding booth and the baghouses for particulate control for the woodworking machines (Plant 6 and Plant 79) shall be in operation and control emissions from the grinding booth (Plant 6), and the woodworking machines (Plant 6 and Plant 79), at all times, the associate units are in operation.

(b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

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

D.2.4 Baghouse Inspections

An inspection shall be performed each calendar quarter of the grinding booth (Plant 6) canisters. All defective canisters shall be replaced.

D.2.5 Baghouse Inspections

An inspection shall be performed each calendar quarter of bags controlling the woodworking machines (Plant 6 and Plant 79). All defective filters and bags shall be replaced.

D.2.6 Broken or Failed Bag Detection

(a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the
event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

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

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

D.2.7 Record Keeping Requirements

(a) To document the compliance status with Conditions D.2.4 and D.2.5, the Permittee shall maintain records of the results of the inspections required under Conditions D.2.4 and D.2.5.

(b) Section C - General Record Keeping Requirements contains the Permittee’s obligations with regard to the records required by this condition.
### Emissions Unit Description:

#### Insignificant Activities:

<table>
<thead>
<tr>
<th>(d) Natural gas-fired combustion unit space heaters, consisting of the following:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Unit</strong></td>
</tr>
<tr>
<td>Plant 1</td>
</tr>
<tr>
<td>Thermocycler</td>
</tr>
<tr>
<td>Plant 2</td>
</tr>
<tr>
<td>Carrier</td>
</tr>
<tr>
<td>Carrier</td>
</tr>
<tr>
<td>Thermocycler</td>
</tr>
<tr>
<td>Thermocycler</td>
</tr>
<tr>
<td>I.C.E Air M/UP</td>
</tr>
<tr>
<td>Plant 3</td>
</tr>
<tr>
<td>Thermocycler</td>
</tr>
<tr>
<td>Reflect-o-Ray</td>
</tr>
<tr>
<td>Carrier</td>
</tr>
<tr>
<td>Water Heater</td>
</tr>
<tr>
<td>Plant 4</td>
</tr>
<tr>
<td>Carrier</td>
</tr>
<tr>
<td>Solaronics</td>
</tr>
<tr>
<td>Economite</td>
</tr>
<tr>
<td>Plant 5</td>
</tr>
<tr>
<td>Thermocycler</td>
</tr>
<tr>
<td>Plant 6</td>
</tr>
<tr>
<td>Rapid Air M/Up</td>
</tr>
<tr>
<td>Hastings Air M/Up</td>
</tr>
<tr>
<td>Weather-rite Air/ M/Up</td>
</tr>
<tr>
<td>Co Ray Vac I/R</td>
</tr>
<tr>
<td>Gordonray I/R</td>
</tr>
<tr>
<td>Re-Verber-Ray I/R</td>
</tr>
<tr>
<td>Plant 79 (Lippert)</td>
</tr>
<tr>
<td>Thermocycler</td>
</tr>
<tr>
<td>Co Ray Vac I/R</td>
</tr>
<tr>
<td>Trane</td>
</tr>
<tr>
<td>Space Ray I/R</td>
</tr>
<tr>
<td>Re-Verber-Ray I/R</td>
</tr>
<tr>
<td>Thermocycler</td>
</tr>
<tr>
<td>Plant 14</td>
</tr>
<tr>
<td>Thermocycler</td>
</tr>
<tr>
<td>Re-Verber-Ray I/R</td>
</tr>
<tr>
<td>Armstrong Ultra</td>
</tr>
</tbody>
</table>
Emission Limitations and Standards  [326 IAC 2-7-5(1)]

D.3.1 Particulate Matter (PM) [326 IAC 6-2-3]

Pursuant to 326 IAC 6-2-3 (Emission limitations for facilities specified in 326 IAC 6-2-1(c)), the particulate matter (PM) emissions from the twenty-one (21) Co Ray Vac I/Rs in Plant 6 listed below, with a combined maximum heat capacity of 1.68 million British thermal units per hour using natural gas as fuel shall be limited to 0.6 pounds per million British thermal unit.

(a) Seven (7) Co Ray Vac I/Rs, constructed in 1976,
(b) Seven (7) Co Ray Vac I/Rs, constructed in 1977,
(c) Seven (7) Co Ray Vac I/Rs, constructed in 1978,

D.3.2 Particulate Emission Limitations for Sources of Indirect Heating [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), the PM emissions from the following units shall not exceed the listed pound per million Btu heat input (lb/MMBtu), as follows:

<table>
<thead>
<tr>
<th>Year Constructed</th>
<th>Plant ID</th>
<th>Emission Unit</th>
<th>PM Emission Limitation for each unit (lbs/MMBtu)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1983</td>
<td>Plant 6</td>
<td>Rapid Air M/Up</td>
<td>☐</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Thermocycler</td>
<td>☐</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Fourteen (14) Co Ray Vac I/R</td>
<td>☐</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Trane</td>
<td>☐</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Three (3) Space Ray I/R</td>
<td>☐</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Re-Verber-Ray I/R</td>
<td>☐</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Two (2) Thermocycler</td>
<td>☐</td>
</tr>
<tr>
<td>1986</td>
<td>Plant 79</td>
<td>five (5) Re-Verber-Ray I/R</td>
<td>☐</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Two (2) Thermocycler</td>
<td>☐</td>
</tr>
<tr>
<td>1987</td>
<td>Plant 14</td>
<td>two (2) Gordonray I/R</td>
<td>☐</td>
</tr>
<tr>
<td>1989</td>
<td>Plant 2</td>
<td>I.C.E Air M/Up</td>
<td>☐</td>
</tr>
<tr>
<td></td>
<td>Plant 3</td>
<td>Thermocycler</td>
<td>☐</td>
</tr>
<tr>
<td></td>
<td>Plant 5</td>
<td>Thermocycler</td>
<td>☐</td>
</tr>
<tr>
<td>1993</td>
<td>Plant 6</td>
<td>four (4) Re-Verber-Ray I/R</td>
<td>☐</td>
</tr>
<tr>
<td>1996</td>
<td>Plant 2</td>
<td>Carrier</td>
<td>☐</td>
</tr>
<tr>
<td>1997</td>
<td>Plant 3</td>
<td>Carrier</td>
<td>☐</td>
</tr>
<tr>
<td>2000</td>
<td>Plant 1</td>
<td>four (4) Thermocycler</td>
<td>☐</td>
</tr>
<tr>
<td></td>
<td>Plant 6</td>
<td>Weather-rite Air/ M/Up</td>
<td>☐</td>
</tr>
<tr>
<td></td>
<td></td>
<td>seventeen (17) Trane</td>
<td>☐</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Trane</td>
<td>☐</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Trane</td>
<td>☐</td>
</tr>
<tr>
<td></td>
<td></td>
<td>three (3) Water Heater</td>
<td>☐</td>
</tr>
<tr>
<td>2001</td>
<td>Plant 3</td>
<td>Reflect-o-Ray</td>
<td>☐</td>
</tr>
<tr>
<td></td>
<td>Plant 4</td>
<td>Carrier</td>
<td>☐</td>
</tr>
<tr>
<td>2002</td>
<td>Plant 6</td>
<td>Hastings Air M/Up</td>
<td>☐</td>
</tr>
<tr>
<td>2003</td>
<td>Plant 2</td>
<td>Thermocycler</td>
<td>☐</td>
</tr>
<tr>
<td>2004</td>
<td>Plant 14</td>
<td>Thermocycler</td>
<td>☐</td>
</tr>
<tr>
<td>2005</td>
<td>Plant 3</td>
<td>Water heater</td>
<td>☐</td>
</tr>
<tr>
<td>Year Constructed</td>
<td>Plant ID</td>
<td>Emission Unit</td>
<td>PM Emission Limitation for each unit (lbs/MMBtu)</td>
</tr>
<tr>
<td>-----------------</td>
<td>---------</td>
<td>----------------------------</td>
<td>-----------------------------------------------</td>
</tr>
<tr>
<td>2007</td>
<td>Plant 4</td>
<td>eleven (11) Solaronics</td>
<td>0.47 (each)</td>
</tr>
<tr>
<td>2013</td>
<td>Plant 2</td>
<td>two (2) Carrier</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Plant 2</td>
<td>two (2) Carrier</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Plant 4</td>
<td>seven (7) Economite</td>
<td></td>
</tr>
<tr>
<td>2014</td>
<td>Plant 14</td>
<td>two (2) Armstrong Ultra</td>
<td></td>
</tr>
<tr>
<td>2016</td>
<td>Plant 3</td>
<td>Reflect-o-Ray</td>
<td></td>
</tr>
</tbody>
</table>

D.3.3 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

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

Plant 6

(a) One (1) fiberglass application area, identified as the General Lamination Department, consisting of the following components:

(1) One (1) gel coat booth, identified as GEL BOOTH 2, constructed in 2000 and approved for modification in 2018 to replace the spray guns with like kind spray guns, with a maximum capacity of 496 pounds of gel coat per hour, utilizing FIT nonatomized spray guns, using dry filters for particulate control, and exhausting to one (1) stack, identified as EF6-12;

(2) One (1) gel coat booth, identified as GEL BOOTH 1, constructed in 2000 and approved for modification in 2018 to replace the spray guns with like kind spray guns, with a maximum capacity of 496 pounds of gel coat per hour, utilizing FIT nonatomized spray guns, using dry filters for particulate control, and exhausting to one (1) stack, identified as EF6-13;

(3) One (1) fiberglass chop station, identified as 1st HULL CHOP, constructed in 1994 and approved for modification in 2018 to replace the spray guns with like kind spray guns, with a maximum capacity of 525 pounds of resin per hour, utilizing flow coating, equipped with dry filters, exhausting to seven (7) general room stacks, identified as EF6-2 through EF6-8;

(4) One (1) fiberglass chop station, identified as 1st DECK CHOP, constructed in 1994 and approved for modification in 2018 to replace the spray guns with like kind spray guns, with a maximum capacity of 525 pounds of resin per hour, utilizing flow coating, equipped with dry filters, exhausting to seven (7) general room stacks identified as EF6-2 through EF6-8;

(5) One (1) fiberglass chop station, identified as SMALL PRODUCTS CHOP, constructed in 1994 and modified in 2018 by replacing the spray guns with like kind spray guns, with a maximum capacity of 525 pounds of resin per hour, utilizing flow coating, equipped with dry filters, exhausting to seven (7) general room stacks identified as EF6-2 through EF6-8;

(6) One (1) fiberglass chop station, identified as 2nd DECK CHOP A, constructed in 1994 and modified in 2018 by replacing the spray guns with like kind spray guns, with a maximum capacity of 525 pounds of resin per hour, utilizing flow coating, equipped with dry filters, exhausting to seven (7) general room stacks identified as EF6-2 through EF6-8;

(7) One (1) fiberglass chop station, identified as 2nd DECK CHOP B, constructed in 1994 and approved for modification in 2018 to replace the spray guns with like kind spray guns, with a maximum capacity of 525 pounds of resin per hour, utilizing flow coating, equipped with dry filters, exhausting to seven (7) general room stacks identified as EF6-2 through EF6-8;

(8) One (1) fiberglass chop station, identified as PORTABLE CHOP, constructed in 1994 and approved for modification in 2018 to replace the spray guns with like kind spray guns, with a maximum capacity of 525 pounds of resin per hour, utilizing flow coating, equipped with dry filters, exhausting to seven (7) general room stacks identified as EF6-
2 through EF6-8;

(9) One (1) fiberglass chop station, identified as BULK HULL CHOP, constructed in 1994 and approved for modification in 2018 to replace the spray guns with like kind spray guns, with a maximum capacity of 525 pounds of resin per hour, utilizing flow coating, equipped with dry filters, exhausting to seven (7) general room stacks identified as EF6-2 through EF6-8;

(10) One (1) fiberglass chop station, identified as STRINGER STATION 1 CHOP, constructed in 2000 and modified in 2018 by replacing the spray guns with like kind spray guns, with a maximum capacity of 525 pounds of resin per hour, utilizing flow coating, equipped with dry filters, exhausting to seven (7) general room stacks identified as EF6-2 through EF6-8;

(11) One (1) fiberglass chop station, identified as STRINGER STATION 2 CHOP, constructed in 2000 and approved for modification in 2018 to replace the spray guns with like kind spray guns, with a maximum capacity of 525 pounds of resin per hour, utilizing flow coating, equipped with dry filters, exhausting to seven (7) general room stacks identified as EF6-2 through EF6-8;

(12) One (1) bilge gel coat process station, identified as BILGE GEL 2, constructed in 2000 and approved for modification in 2018 to replace the spray guns with like kind spray guns, used to coat storage areas in the bow, stern and ski lockers, utilizing one (1) FIT nonatomized spray gun, with a maximum capacity of 1.3 units per hour and 413.33 pounds of gel coat per hour, using dry filters for particulate control, exhausting to one (1) stack, identified as EF6-9.

(13) One (1) bilge gel coat process station, identified as BILGE GEL 1, constructed in 2000, permitted in 2018 and approved for modification in 2018 to replace the spray guns with like kind spray guns, used to coat certain visible sections of the underside of the deck, utilizing one (1) FIT nonatomized spray gun, with a maximum capacity of 1.3 units per hour and 413.33 pounds of gel coat per hour, using dry filters for particulate control, exhausting to seven (7) general room stacks, identified as EF6-2 through EF6-8.

Under 40 CFR 63, Subpart VVVV, all above emission units, in item (a) are considered existing units in an existing affected source.

(b) Miscellaneous Activities, constructed in 2000, with a combined maximum capacity of 1 gallon per unit, no control and exhausting indoors:

(1) Spot repair/touch-up paint of steel and/or aluminum frame members using hand held spray cans;

(2) Spot repair/touch-up paint of fiberglass boats using hand held spray cans;

(3) Spot repair/touch-up gel coat of fiberglass boats and/or parts, with air-atomized spray guns.

(4) One (1) glue station utilizing a reactive adhesive that is applied by one (1) metered hand applicator.

Under 40 CFR 63, Subpart VVVV, all emission units (b)(3) and (4) are considered existing units in an existing affected source.

(c) Plant 6 Boat Assembly Operations, constructed in 1974, permitted in 2018, used for laminated
hurricane boats, consisting of mold release, mold cleaner and curing agents, hand applied or using handheld spray cans, with maximum capacity of 28,597 pounds/year, no control, exhausting indoors.

Under 40 CFR 63, Subpart VVVV, emission unit above is considered an existing unit in an existing affected source.

(g) One (1) assembly operation, identified as BAO-P6, constructed in 2000, permitted in 2018, approved in 2021 for modification, consisting of 2 operational putty guns for bonding and filling, no control, exhausting indoors.

The 2021 modification is to add a second operational putty gun and a back up putty gun and to relocate from Plant 2 to Plant 6.

One (1) short term back up putty gun apparatus will be kept in storage and will be used to temporarily replace either of the operational putty guns that might need to be taken offline for the purpose of repairing or performing maintenance on either of the operational putty guns.

Under 40 CFR 63, Subpart VVVV, all emission units are considered existing units in an existing affected source.

Plant 79

(c) Lippert Adhesives marine furniture assembly area, consisting of thirty-one (31) adhesive application stations, identified as ES1 through ES31, constructed in 1974, modified in 2016, permitted in 2018, each with a maximum throughput of 1.45 units per hour and a maximum 0.06 gallons of adhesive per hour, utilizing HVLP spray guns, no control and exhausting indoors.

Under 40 CFR 63, Subpart VVVV, emission unit above is considered an existing unit in an existing affected source.

Plant 2

(a) One (1) assembly operation, identified as BAO-P2, constructed in 2000, approved in 2021 to add a second putty gun, with a maximum capacity of 1 unit per hour and 0.16 gallon per unit, utilizing one (1) portable glue gun and two (2) putty guns using polyester putty for caulking, hand held guns using urethane caulks and silicone sealants, and spray cans of adhesive, with a maximum capacity of 76,356 pounds/year, no control and exhausting indoors.

One (1) short term back up putty gun apparatus will be kept in storage and will be used to temporarily replace either of the operational putty guns that might need to be taken offline for the purpose of repairing or performing maintenance on either of the operational putty guns.

Under 40 CFR 63, Subpart VVVV, all emission units are considered existing units in an existing affected source.

Insignificant Activities:

(a) Plant 1 Boat Assembly Operations, constructed in 2000, permitted in 2018, used for sealing and finishing Pontoon boats, all hand applied during assembly process, no control, exhausting indoors, consisting of caulking, cleaning, degreasing, protecting and touch-up, with a maximum capacity of 523,818 pounds/year, as well as the following water based adhesive processes:
(1) One (1) vinyl floor roll-on station, located in Plant 1;

(2) One (1) carpeting roll-on station, located in Plant 1; and

(3) One (1) carpet adhesive roll-on station and one (1) vinyl adhesive roll-on station, located in Plant 1.

Under 40 CFR 63, Subpart VVVV, all above emission units are considered existing units in an existing affected source.

(b) Plant 3 Boat Assembly Operations, constructed in 2014, permitted in 2018, consisting of spot repair/touch-up paint of steel and/or aluminum frame members using hand held spray paint cans, with a maximum capacity of 107 pounds/year, no control, exhausting indoors

Under 40 CFR 63, Subpart VVVV, all emission units in this section are considered existing units in an existing affected source.

(e) One (1) foam application located in Plant 6, approved in 2021 for construction, with a maximum capacity of two tenths (0.20) gallon per hour, using no controls, and exhausting indoors.

Under 40 CFR 63, Subpart VVVV, all emission units are considered existing units in an existing affected source.

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

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


(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 units listed above, except as otherwise specified in 40 CFR Part 63, Subpart VVVV.

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

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

E.1.2 Boat Manufacturing NESHAP [40 CFR Part 63, Subpart VVVV][326 IAC 20-48]

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

(1) 40 CFR 63.5680
(2) 40 CFR 63.5683
(3) 40 CFR 63.5689
(4) 40 CFR 63.5692
(5) 40 CFR 63.5695
<table>
<thead>
<tr>
<th></th>
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<tr>
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<td>40 CFR 63.5713</td>
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<td>34</td>
<td>40 CFR 63.5779</td>
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</table>
Source Name: Highwater Marine, LLC dba Godfrey Marine
Source Address: 4500 Middlebury Street, 4310 Middlebury Street, 631 Bullard Road, 630 Bullard Road, 651 Bullard Road, 720 CR 15, 4301 Bullard Road, and 4400 Middlebury Street, Elkhart, Indiana 46516
Part 70 Permit No.: T039-39228-00267

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

PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT

Source Name: Highwater Marine, LLC dba Godfrey Marine
Source Address: 4500 Middlebury Street, 4310 Middlebury Street, 631 Bullard Road,
630 Bullard Road, 651 Bullard Road, 720 CR 15, 4301 Bullard Road, and 4400 Middlebury Street, Elkhart, Indiana 46516
Part 70 Permit No.: T039-39228-00267

This form consists of 2 pages

☐ 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>Question</th>
<th>Answer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Date/Time Emergency started:</td>
<td>N/A</td>
</tr>
<tr>
<td>Date/Time Emergency was corrected:</td>
<td></td>
</tr>
<tr>
<td>Was the facility being properly operated at the time of the emergency?</td>
<td>Y</td>
</tr>
<tr>
<td>Type of Pollutants Emitted: TSP, PM-10, SO₂, VOC, NOₓ, CO, Pb, other:</td>
<td></td>
</tr>
<tr>
<td>Estimated amount of pollutant(s) emitted during emergency:</td>
<td></td>
</tr>
<tr>
<td>Describe the steps taken to mitigate the problem:</td>
<td></td>
</tr>
<tr>
<td>Describe the corrective actions/response steps taken:</td>
<td></td>
</tr>
<tr>
<td>Describe the measures taken to minimize emissions:</td>
<td></td>
</tr>
<tr>
<td>If applicable, describe the reasons why continued operation of the</td>
<td></td>
</tr>
<tr>
<td>facilities are necessary to prevent imminent injury to persons, severe</td>
<td></td>
</tr>
<tr>
<td>damage to equipment, substantial loss of capital investment, or loss</td>
<td></td>
</tr>
<tr>
<td>of product or raw materials of substantial economic value:</td>
<td></td>
</tr>
</tbody>
</table>

Form Completed by: ________________________________
Title / Position: ________________________________
Date: ________________________________
Phone: ________________________________
**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**  
**OFFICE OF AIR QUALITY**  
**COMPLIANCE AND ENFORCEMENT BRANCH**  
**Part 70 Quarterly Report**

Source Name: Highwater Marine, LLC dba Godfrey Marine  
Source Address: 4500 Middlebury Street, 4310 Middlebury Street, 631 Bullard Road, 630 Bullard Road, 651 Bullard Road, 720 CR 15, 4301 Bullard Road, and 4400 Middlebury Street, Elkhart, Indiana 46516

Part 70 Permit No.: T039-39228-00267

Facility:

<table>
<thead>
<tr>
<th>Plant 6 Unit type</th>
<th>Unit ID</th>
</tr>
</thead>
<tbody>
<tr>
<td>gel coat booth</td>
<td>GEL BOOTH 2</td>
</tr>
<tr>
<td>gel coat booth</td>
<td>GEL BOOTH 1</td>
</tr>
<tr>
<td>fiberglass chop station</td>
<td>1st HULL CHOP</td>
</tr>
<tr>
<td>fiberglass chop station</td>
<td>1st DECK CHOP</td>
</tr>
<tr>
<td>fiberglass gel coat</td>
<td>SMALL PRODUCTS CHOP</td>
</tr>
<tr>
<td>fiberglass gel coat</td>
<td>2nd DECK CHOP A</td>
</tr>
<tr>
<td>fiberglass gel coat</td>
<td>2nd DECK CHOP B</td>
</tr>
<tr>
<td>fiberglass gel coat</td>
<td>PORTABLE CHOP</td>
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<tr>
<td>fiberglass gel coat</td>
<td>BULK HULL CHOP</td>
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<tr>
<td>fiberglass gel coat</td>
<td>STRINGER STATION 1 CHOP</td>
</tr>
<tr>
<td>fiberglass gel coat</td>
<td>STRINGER STATION 2 CHOP</td>
</tr>
<tr>
<td>bilge gel coat process station</td>
<td>BILGE GEL 2</td>
</tr>
<tr>
<td>bilge gel coat process station</td>
<td>BILGE GEL 1</td>
</tr>
<tr>
<td>Plant 6 boat assembly operation</td>
<td>BAO-P6</td>
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<tr>
<td>Plant 6 assembly operation</td>
<td>Foam application</td>
</tr>
<tr>
<td>Plant 2 boat assembly operation</td>
<td>BAO-P2</td>
</tr>
</tbody>
</table>

Parameter: VOC usage (PSD minor limit)  
Limit: Shall not exceed 144 tons per twelve (12) consecutive month period (Condition D.1.1(a))

| QUARTER: ______________ | YEAR: ______________ |

<table>
<thead>
<tr>
<th>Month</th>
<th>Column 1 (tons)</th>
<th>Column 2 (tons)</th>
<th>Column 1 + Column 2 (tons)</th>
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</thead>
<tbody>
<tr>
<td>This Month</td>
<td>Previous 11 Months</td>
<td>12 Month Total</td>
<td></td>
</tr>
<tr>
<td></td>
<td>(tons)</td>
<td>(tons)</td>
<td>(tons)</td>
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</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:  

[Signature] [Date]  
[Signature] [Date]
Source Name: Highwater Marine, LLC dba Godfrey Marine  
Source Address: 4500 Middlebury Street, 4310 Middlebury Street, 631 Bullard Road, 630 Bullard Road, 651 Bullard Road, 720 CR 15, 4301 Bullard Road, and 4400 Middlebury Street, Elkhart, Indiana 46516
Part 70 Permit No.: T039-39228-00267

Facility:

<table>
<thead>
<tr>
<th>Plant 6 Unit type</th>
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<tbody>
<tr>
<td>gel coat booth</td>
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<td>fiberglass chop station</td>
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<tr>
<td>fiberglass chop station</td>
<td>2nd DECK CHOP A</td>
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<tr>
<td>fiberglass chop station</td>
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<td>STRINGER STATION 1 CHOP</td>
</tr>
<tr>
<td>fiberglass chop station</td>
<td>STRINGER STATION 2 CHOP</td>
</tr>
</tbody>
</table>

Parameter: VOC usage (326 IAC 8-1-6)
Limit: Shall be less than 220 tons per twelve (12) consecutive month period. (Condition D.1.2(a)(1))

<table>
<thead>
<tr>
<th>QUARTER</th>
<th>YEAR</th>
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<table>
<thead>
<tr>
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<th>Column 2</th>
<th>Column 1 + Column 2</th>
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<tbody>
<tr>
<td></td>
<td>This Month (tons)</td>
<td>Previous 11 Months (tons)</td>
<td>12 Month Total (tons)</td>
</tr>
</tbody>
</table>

- □ No deviation occurred in this quarter. Submitted by: ____________________
- □ Deviation/s occurred in this quarter. Signature: ____________________
- Deviation has been reported on: Date: ____________________ Phone: ____________________
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
Part 70 Quarterly Report

Source Name: Highwater Marine, LLC dba Godfrey Marine
Source Address: 4500 Middlebury Street, 4310 Middlebury Street, 631 Bullard Road,
630 Bullard Road, 651 Bullard Road, 720 CR 15, 4301 Bullard Road, and 4400
Middlebury Street, Elkhart, Indiana 46516
Part 70 Permit No.: T039-39228-00267

Facility:

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<th>Plant 6 Unit type</th>
<th>Unit ID</th>
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<tbody>
<tr>
<td>bilge gel coat process station</td>
<td>BILGE GEL 2</td>
</tr>
<tr>
<td>bilge gel coat process station</td>
<td>BILGE GEL 1</td>
</tr>
</tbody>
</table>

Parameter: VOC usage (PSD and 326 IAC 8-1-6 minor limit)
Limit: Combined total VOC shall not exceed fifteen (15) tons per twelve (12) consecutive month period. (Condition D.1.1(b))

QUARTER: _______________ YEAR: _______________

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<tr>
<th>Month</th>
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<th>Column 1 + Column 2</th>
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<td>This Month (tons)</td>
<td>Previous 11 Months (tons)</td>
<td>12 Month Total (tons)</td>
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☐ No deviation occurred in this quarter.

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

Submitted by: _______________________________________
Title / Position: _____________________________________
Signature: __________________________________________
Date: _______________________________________________
Phone: _____________________________________________
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE AND ENFORCEMENT BRANCH  
Quarterly Report  

Source Name: Highwater Marine, LLC dba Godfrey Marine  
Source Address: 4500 Middlebury Street, 4310 Middlebury Street, 631 Bullard Road, 630 Bullard Road, 651 Bullard Road, 720 CR 15, 4301 Bullard Road, and 4400 Middlebury Street, Elkhart, Indiana 46516  
FESOP Permit No.: 039-43777-00267  
Facility: Plant 2 boat assembly operation (BAO-P2)  
Parameter: Putty Compound throughput  
Limit: Shall not exceed 19,500 gallons per twelve (12) month consecutive period with compliance determined at the end of each month (Condition D.1.5).  

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<tr>
<td>Month</td>
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☐ No deviation occurred in this quarter.  
☐ Deviation/s occurred in this quarter.  
Deviation has been reported on: ___________________

Submitted by: ____________________________________________________________
Title / Position: _________________________________________________________
Signature: ____________________________________________________________
Date: _________________________________________________________________
Phone: _________________________________________________________________
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Highwater Marine, LLC dba Godfrey Marine
Source Address: 4500 Middlebury Street, 4310 Middlebury Street, 631 Bullard Road,
630 Bullard Road, 651 Bullard Road, 720 CR 15, 4301 Bullard Road, and 4400
Middlebury Street, Elkhart, Indiana 46516
Part 70 Permit No.: T039-39228-00267

Months: __________ to __________ Year: __________

This report shall be submitted quarterly based on a calendar year. Proper notice submittal under Section B -Emergency Provisions satisfies the reporting requirements of paragraph (a) of Section C -General Reporting. Any deviation from the requirements of this permit, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

- [ ] NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.
- [ ] THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

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

<table>
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<table>
<thead>
<tr>
<th>Response Steps Taken:</th>
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</tbody>
</table>

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Form Completed by: _____________________________

Title / Position: _____________________________

Date: _____________________________

Phone: _____________________________
Indiana Department of Environmental Management
Office of Air Quality

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

<table>
<thead>
<tr>
<th>Source Description and Location</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Source Name:</strong></td>
</tr>
<tr>
<td><strong>Source Location:</strong></td>
</tr>
<tr>
<td><strong>County:</strong></td>
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<tr>
<td><strong>SIC Code:</strong></td>
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<tr>
<td><strong>Operation Permit No.:</strong></td>
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<tr>
<td><strong>Operation Permit Issuance Date:</strong></td>
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<tr>
<td><strong>Significant Source Modification No.:</strong></td>
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<tr>
<td><strong>Significant Permit Modification No.:</strong></td>
</tr>
<tr>
<td><strong>Permit Reviewer:</strong></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Source Definition</th>
</tr>
</thead>
</table>

This source consists of nine (9) plants:

(a) Plant 1 (PONTOON) is located at 4500 Middlebury Street, Elkhart, Indiana 46516;

(b) Plant 2 (HURRICANE ASSEMBLY) is located at 4310 Middlebury Street, Elkhart, Indiana 46516;

(c) Plant 3 (METAL FAB) is located at 631 Bullard Road, Elkhart, Indiana 46516;

(d) Plant 4 is located at 630 Bullard Road, Elkhart, Indiana 46516;

(e) Plant 5 is located on a private drive within the source complex, it does not have a physical address.

(f) Plant 6 (HURRICANE LAMINATION) is located at 720 CR 15, Elkhart, Indiana 46516;

(g) Plant 79 (SEWING)(LIPPERT) is located at 651 Bullard Road, Elkhart, Indiana 46516;

(h) Plant 79 (WOODSHOP)(LIPPERT) is located at 4301 Bullard Road, Elkhart, Indiana 46516;

(i) Plant 14 is located at 4400 Middlebury Street, Elkhart, Indiana 46516.

“Plant” in this case refers to building numbers. These nine plants are located on contiguous properties, have the same SIC codes and are under common control, therefore they will be considered one (1) source, as defined by 326 IAC 2-7-1(22).

This determination was initially made under the initial Part 70 operating permit No. 039-8962-00267, issued on May 25, 2000. The source determination was revised under SSM 039-39230-00267, issued April 23, 2018, and Part 70 Renewal T039-39228-00267, issued May 10, 2018.

This is not being reevaluated in these Part 70 Significant Source Modification 039-43777-00267 or Part 70 Significant Permit Modification 039-43851-00267.
Existing Approvals

The source was issued Part 70 Operating Permit Renewal No. T039-39228-00267 on May 10, 2018. The source has since received the following approvals:

<table>
<thead>
<tr>
<th>Permit Type</th>
<th>Permit Number</th>
<th>Issuance Date</th>
</tr>
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<tbody>
<tr>
<td>TV Significant Source Modification</td>
<td>039-39230-00267</td>
<td>April 23, 2018</td>
</tr>
<tr>
<td>Administrative Amendment</td>
<td>039-40052-00267</td>
<td>June 27, 2018</td>
</tr>
<tr>
<td>Administrative Amendment</td>
<td>039-42350-00267</td>
<td>January 17, 2020</td>
</tr>
</tbody>
</table>

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.

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

Fugitive Emissions

Since this type of operation is not one (1) of the twenty-eight (28) listed source categories under 326 IAC 2-2-1(ff)(1), 326 IAC 2-3-2(g), or 326 IAC 2-7-1(22)(B), and there is no applicable New Source Performance Standard or National Emission Standard for Hazardous Air Pollutants that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.
The fugitive emissions of hazardous air pollutants (HAP) are counted toward the determination of Part 70 Permit applicability and source status under Section 112 of the Clean Air Act (CAA).

### Greenhouse Gas (GHG) Emissions

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

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

### Source Status - Existing Source

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

<table>
<thead>
<tr>
<th>Source-Wide Emissions Prior to Modification (ton/year)</th>
<th>PM0</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><strong>Total PTE of Entire Source Excluding Fugitive Emissions</strong></td>
<td>147.39</td>
<td>148.09</td>
<td>148.09</td>
<td>0.07</td>
<td>12.37</td>
<td>224.62</td>
<td>10.39</td>
<td>1,674.85</td>
<td>1,985.80</td>
</tr>
<tr>
<td><strong>Title V Major Source Thresholds</strong></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><strong>PSD Major Source Thresholds</strong></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), PM10 and PM2.5, not particulate matter (PM), are each considered as a “regulated air pollutant.”
2. PM2.5 listed is direct PM2.5.
3. Single highest source-wide HAP (Styrene)
4. Fugitive HAP emissions are always included in the source-wide emissions.

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

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

(c) These emissions are based on the TSD of Administrative Amendment No. 039-42350-00267, issued on January 17, 2020.
Description of Proposed Modification

The Office of Air Quality (OAQ) has reviewed an application, submitted by Highwater Marine, LLC dba Godfrey Marine on February 19, 2021, relating to the following:

(a) Adding one (1) putty gun to each of the assembly operations currently listed in Plant 2. In addition, one of these assembly operations will be relocating from Plant 2 to Plant 6. The material used in each of the assembly operations are also going to be updated and increasing the potential emissions. The new PTE is shown in the calculations attached as Appendix A to this TSD.

Plant 6

(g) One (1) assembly operation, identified as BAO-P6, constructed in 2000, permitted in 2018, approved in 2021 for modification, consisting of 2 operational putty guns for bonding and filling, with a maximum capacity of 7.5 gallons per hour, no control, exhausting indoors.

The 2021 modification is to add a second operational putty gun and a backup putty gun and to relocate from Plant 2 to Plant 6.

One (1) short term back up putty gun apparatus will be kept in storage and will be used to temporarily replace either of the operational putty guns that might need to be taken offline for the purpose of repairing or performing maintenance on either of the operational putty guns.

Under 40 CFR 63, Subpart VVVV, all emission units are considered existing units in an existing affected source.

Plant 2

(a) Plant 2 Boat Assembly Operations, consisting of:

(1) one (1) assembly operation, identified as BAO-P2, constructed in 2000, approved in 2021 to add a second putty gun, with a maximum capacity of 1 unit per hour and 0.16 gallon per unit, utilizing one (1) portable glue gun and one (1) two (2) putty guns using polyester putty for caulking, hand held guns using urethane caulks and silicone sealants, and spray cans of adhesive, with a maximum capacity of 76,356 pounds/year, no control and exhausting indoors.;

One (1) short term backup putty gun apparatus will be kept in storage and will be used to temporarily replace either of the operational putty guns that might need to be taken offline for the purpose of repairing or performing maintenance on either of the operational putty guns.

Under 40 CFR 63, Subpart VVVV, all emission units are considered existing units in an existing affected source.

(b) Adding one spare (1) putty gun apparatus to each location as a part of the preventative maintenance program.
One (1) short term back up putty gun apparatus will be kept in storage and will be used to temporarily replace either of the permitted putty guns that might need to be taken offline for the purpose of repairing or perform maintenance on either of the permitted putty guns.

(c) Adding one (1) foam application process Section A.4 Insignificant Activities:

One (1) foam application located in Plant 6, approved in 2021 for construction, with a maximum capacity of two tenths (0.20) gallon per hour, using no controls, and exhausting indoors.

(d) Modifying the VOC limit of 144 tons per year to include the two (2) putty operations and the foam application process. The limit of 144 tons will not be changed, only the list of emission units included in the limit will change.

D.1.1 Prevention of Significant Deterioration (PSD Minor Limit) VOC, PM, PM10 and PM2.5

In order to render 326 IAC 2-2 not applicable, the Permittee shall comply with the following:

(a)

(1) The use of resins and gel coats in the following facilities in Plant 6:

<table>
<thead>
<tr>
<th>Plant 6 Unit type</th>
<th>Unit ID</th>
</tr>
</thead>
<tbody>
<tr>
<td>gel coat booth</td>
<td>GEL BOOTH 2</td>
</tr>
<tr>
<td>gel coat booth</td>
<td>GEL BOOTH 1</td>
</tr>
<tr>
<td>fiberglass chop station</td>
<td>1st HULL CHOP</td>
</tr>
<tr>
<td>fiberglass chop station</td>
<td>1st DECK CHOP</td>
</tr>
<tr>
<td>fiberglass chop station</td>
<td>SMALL PRODUCTS CHOP</td>
</tr>
<tr>
<td>fiberglass chop station</td>
<td>2nd DECK CHOP A</td>
</tr>
<tr>
<td>fiberglass chop station</td>
<td>2nd DECK CHOP B</td>
</tr>
<tr>
<td>fiberglass chop station</td>
<td>PORTABLE CHOP</td>
</tr>
<tr>
<td>fiberglass chop station</td>
<td>BULK HULL CHOP</td>
</tr>
<tr>
<td>fiberglass chop station</td>
<td>STRINGER STATION 1 CHOP</td>
</tr>
<tr>
<td>fiberglass chop station</td>
<td>STRINGER STATION 2 CHOP</td>
</tr>
<tr>
<td>bilge gel coat process station</td>
<td>BILGE GEL 2</td>
</tr>
<tr>
<td>bilge gel coat process station</td>
<td>BILGE GEL 1</td>
</tr>
</tbody>
</table>

(2) The use of putty and foam materials in the following facilities:

<table>
<thead>
<tr>
<th>Unit Type</th>
<th>Unit ID</th>
</tr>
</thead>
<tbody>
<tr>
<td>Plant 6 boat assembly operation</td>
<td>BAO-P6</td>
</tr>
<tr>
<td>Plant 6 assembly operation</td>
<td>Foam application</td>
</tr>
<tr>
<td>Plant 2 boat assembly operation</td>
<td>BAO-P2</td>
</tr>
</tbody>
</table>

shall be limited such that the PTE of VOC shall not exceed one hundred and forty-four (144) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

(e) Adding a new VOC limit for BAO-P2 to render the requirements of 326 IAC 8-1-6 not applicable.

“Integral Part of the Process” Determination

In October 1993 a Final Order Granting Summary Judgment was signed by Administrative Law Judge (“ALJ”) Garretson resolving an appeal filed by Kimball Hospitality Furniture Inc. (Cause Nos. 92-A-J-730 and 92-A-J-833) related to the method by which IDEM calculated potential emissions from woodworking operations. In his findings, the ALJ determined that particulate controls are necessary for the facility to
produce its normal product and are integral to the normal operation of the facility, and therefore, potential emissions should be calculated after controls. Based on this ruling, the potential to emit particulate matter from the woodworking operations was calculated after control for purposes of determining permitting level and applicability of 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)).

As part of Part 70 Operating Permit renewal No. T039-32282-00267, issued on August 1, 2013, IDEM, OAQ previously determined that the baghouses are an integral part of the Plant 6 and Plant 79 woodworking machines.

This is not being reevaluated in these Part 70 Significant Source Modification 039-43777-00267 or Part 70 Significant Permit Modification 039-43851-00267.

### 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

There are no new emission units or modifications to existing emission units (i.e., no physical change or change in the method of operation occurring at the source) as a result of this modification. See the "Description of Proposed Modification" section above for more detail.

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>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$^2$</th>
<th>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Foam Application</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>1.29</td>
<td>--</td>
<td>--</td>
<td>--</td>
</tr>
<tr>
<td><strong>Total PTE Before Controls of the New Emission Units:</strong></td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>1.29</td>
<td>--</td>
<td>--</td>
<td>--</td>
</tr>
</tbody>
</table>

$^1$PM$_{2.5}$ listed is direct PM$_{2.5}$.

$^2$Single highest HAP.

Appendix A of this TSD reflects the detailed potential emissions of the modification.
PTE Increase of the Modified Emission Unit(s)/Process(es) (ton/year)

<table>
<thead>
<tr>
<th>Process / Emission Unit</th>
<th>PM</th>
<th>PM$_{10}$</th>
<th>PM$_{2.5}$$^1$</th>
<th>SO$_2$</th>
<th>NO$_X$</th>
<th>VOC</th>
<th>CO</th>
<th>Single HAP$^2$</th>
<th>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>PTE Before Modification of BAO-P2</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>2.62</td>
<td>--</td>
<td>2.73</td>
<td>2.73</td>
</tr>
<tr>
<td>PTE After Modification of BAO-P2</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>84.05</td>
<td>--</td>
<td>9.82</td>
<td>9.82</td>
</tr>
<tr>
<td><strong>PTE Increase of BAO-P2</strong></td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>81.44</td>
<td>--</td>
<td>7.09</td>
<td>7.09</td>
</tr>
<tr>
<td>PTE Before Modification of BAO-P6</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>7.48</td>
<td>--</td>
<td>7.48</td>
<td>7.48</td>
</tr>
<tr>
<td>PTE After Modification of BAO-P6</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>16.26</td>
<td>--</td>
<td>1.91</td>
<td>1.91</td>
</tr>
<tr>
<td><strong>PTE Increase of BAO-P6</strong></td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>8.77</td>
<td>--</td>
<td>--</td>
<td>--</td>
</tr>
<tr>
<td>Total PTE Increase of the Modified Emission Unit(s)/Process</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>90.21</td>
<td>--</td>
<td>7.09</td>
<td>7.09</td>
</tr>
</tbody>
</table>

$^1$PM$_{2.5}$ listed is direct PM$_{2.5}$.
$^2$Single highest HAP.

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

PTE Increases Due to the Modification (ton/year)

<table>
<thead>
<tr>
<th></th>
<th>PM</th>
<th>PM$_{10}$</th>
<th>PM$_{2.5}$$^1$</th>
<th>SO$_2$</th>
<th>NO$_X$</th>
<th>VOC</th>
<th>CO</th>
<th>Single HAP$^2$</th>
<th>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total PTE Before Controls of the New Emission Units</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>1.29</td>
<td>--</td>
<td>--</td>
<td>--</td>
</tr>
<tr>
<td>Total PTE Increase of the Modified Emission Unit(s)/Process</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>90.21</td>
<td>--</td>
<td>7.09</td>
<td>7.09</td>
</tr>
<tr>
<td>Total PTE of the Modification</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>91.50</td>
<td>--</td>
<td>7.09</td>
<td>7.09</td>
</tr>
</tbody>
</table>

$^1$PM$_{2.5}$ listed is direct PM$_{2.5}$.
$^2$Single highest HAP.

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

(a) Approval to Construct

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

(b) Approval to Operate

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

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 Modification.
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>PM¹</th>
<th>PM₁₀¹</th>
<th>PM₂.₅¹,₂</th>
<th>SO₂</th>
<th>NOₓ</th>
<th>VOC</th>
<th>CO</th>
<th>Single HAP³</th>
<th>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total PTE of Entire Source Excluding Fugitives*</td>
<td>147.39</td>
<td>148.09</td>
<td>148.09</td>
<td>0.07</td>
<td>12.37</td>
<td>202.03</td>
<td>10.39</td>
<td>1,676.37</td>
<td>2,585.89</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>

¹Under the Part 70 Permit program (40 CFR 70), PM₁₀ and PM₂.₅, not particulate matter (PM), are each considered as a “regulated air pollutant.”
²PM₂.₅ listed is direct PM₂.₅.
³Single 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) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this proposed modification.

National Emission Standards for Hazardous Air Pollutants (NESHAP):

(a) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Shipbuilding and Ship Repair (Surface Coating) (40 CFR 63.780, Subpart II) are not included for this source because, this source manufactures pleasure craft and, pursuant to 40 CFR 63.782, the definition of ship does not include pleasure craft.

(b) The requirements of the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products (40 CFR Part 63.4480, Subpart PPPP) are not included for this source, because the source is subject to the requirements of 40 CFR 63, Subpart VVVV, and there are no post-mold surface coating operations performed on personal watercraft and parts of personal watercraft at the facility (40 CFR 63.4481(c)(15)).

(c) This source is still subject to the National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing (40 CFR Part 63.5680, Subpart VVVV), which is incorporated by reference as 326 IAC 20-48. The units subject to this rule include the following:
This source is subject to the following portions of Subpart VVVV.

(1) 40 CFR 63.5680
(2) 40 CFR 63.5683
(3) 40 CFR 63.5689
(4) 40 CFR 63.5692
(5) 40 CFR 63.5695
(6) 40 CFR 63.5698
(7) 40 CFR 63.5701
(8) 40 CFR 63.5704
(9) 40 CFR 63.5707
(10) 40 CFR 63.5710
(11) 40 CFR 63.5713
(12) 40 CFR 63.5714
(13) 40 CFR 63.5715
(14) 40 CFR 63.5716
(15) 40 CFR 63.5719
(16) 40 CFR 63.5722
(17) 40 CFR 63.5725
(18) 40 CFR 63.5731
(19) 40 CFR 63.5734
(20) 40 CFR 63.5737
(21) 40 CFR 63.5740
(22) 40 CFR 63.5743
(23) 40 CFR 63.5746
(24) 40 CFR 63.5749
(25) 40 CFR 63.5752
(26) 40 CFR 63.5753
(27) 40 CFR 63.5755
(28) 40 CFR 63.5758
(29) 40 CFR 63.5761
(30) 40 CFR 63.5764
(31) 40 CFR 63.5767
(32) 40 CFR 63.5770
(33) 40 CFR 63.5773
(34) 40 CFR 63.5776
(35) 40 CFR 63.5779

The provisions of 40 CFR 63 Subpart A – General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR 63 Subpart VVVV.

This is an existing requirement with updated and new units being added during SSM 039-43777-00267 and SPM 039-43851-00267.

(d) The requirements of the National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production (40 CFR Part 63.5780, Subpart WWWW) are not included for this source, because the source is subject to 40 CFR 63, Subpart VVVV and all reinforced plastics composites manufacturing is for the manufacture of boats (40 CFR 63.5787(b)).
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 requirements of 40 CFR Part 64, CAM, are not applicable to any of the new and modified units as part of this modification because they do not use controls; therefore CAM does not apply.

**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 and Emission Offset section of this document.

**PSD Minor Source Limits**

In order to render 326 IAC 2-2 not applicable, the Permittee shall comply with the following:

(a)

(1) The use of resins and gel coats in the following facilities in Plant 6:

<table>
<thead>
<tr>
<th>Plant 6 Unit type</th>
<th>Unit ID</th>
</tr>
</thead>
<tbody>
<tr>
<td>gel coat booth</td>
<td>GEL BOOTH 2</td>
</tr>
<tr>
<td>gel coat booth</td>
<td>GEL BOOTH 1</td>
</tr>
<tr>
<td>fiberglass chop station</td>
<td>1st HULL CHOP</td>
</tr>
<tr>
<td>fiberglass chop station</td>
<td>1st DECK CHOP</td>
</tr>
<tr>
<td>fiberglass chop station</td>
<td>SMALL PRODUCTS CHOP</td>
</tr>
<tr>
<td>fiberglass chop station</td>
<td>2nd DECK CHOP A</td>
</tr>
<tr>
<td>fiberglass chop station</td>
<td>2nd DECK CHOP B</td>
</tr>
<tr>
<td>fiberglass chop station</td>
<td>PORTABLE CHOP</td>
</tr>
<tr>
<td>fiberglass chop station</td>
<td>BULK HULL CHOP</td>
</tr>
<tr>
<td>fiberglass chop station</td>
<td>STRINGER STATION 1 CHOP</td>
</tr>
<tr>
<td>fiberglass chop station</td>
<td>STRINGER STATION 2 CHOP</td>
</tr>
<tr>
<td>bilge gel coat process station</td>
<td>BILGE GEL 1</td>
</tr>
<tr>
<td>bilge gel coat process station</td>
<td>BILGE GEL 2</td>
</tr>
</tbody>
</table>

(2) The use of putty and foam materials in the following facilities:
Plant and Unit Type | Unit ID
---|---
Plant 6 boat assembly operation | BAO-P6
Plant 6 Foam application | Foam application
Plant 2 boat assembly operation | BAO-P2

shall be limited such that the PTE of VOC shall not exceed one hundred and forty-four (144) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

(b) The use of gel coats shall be limited such that the combined total PTE of VOC from the following:

<table>
<thead>
<tr>
<th>Plant 6 Unit type</th>
<th>Unit ID</th>
</tr>
</thead>
<tbody>
<tr>
<td>bilge gel coat process station</td>
<td>BILGE GEL 2</td>
</tr>
<tr>
<td>bilge gel coat process station</td>
<td>BILGE GEL 1</td>
</tr>
</tbody>
</table>

shall not exceed 15 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

(c) The PM, PM$_{10}$, PM$_{2.5}$ emissions rates shall be limited as follows:

<table>
<thead>
<tr>
<th>Plant 6 Unit type</th>
<th>Unit ID</th>
<th>PM (lb/hr)</th>
<th>PM$_{10}$ (lb/hr)</th>
<th>PM$_{2.5}$ (lb/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>gel coat booth</td>
<td>GEL BOOTH 2</td>
<td>3.59</td>
<td>3.59</td>
<td>3.59</td>
</tr>
<tr>
<td>gel coat booth</td>
<td>GEL BOOTH 1</td>
<td>3.59</td>
<td>3.59</td>
<td>3.59</td>
</tr>
<tr>
<td>bilge gel coat process station</td>
<td>BILGE GEL 2</td>
<td>7.14</td>
<td>7.14</td>
<td>7.14</td>
</tr>
<tr>
<td>bilge gel coat process station</td>
<td>BILGE GEL 1</td>
<td>2.98</td>
<td>2.98</td>
<td>2.98</td>
</tr>
</tbody>
</table>

Compliance with these limitations, combined with the limited potential to emit from other emission units at this source, shall limit the source-wide total potential to emit VOC, PM, PM$_{10}$, and PM$_{2.5}$ to less than 250 tons per 12 consecutive month period and shall apply 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

Additionally, compliance with the limit in Condition (b) shall limit the VOC emissions from the Bilge gel coat process stations (BILGE GEL 2, BILGE GEL 1) to less than twenty-five (25) tons per twelve (12) consecutive month period and shall render 326 IAC 2-2 PSD and 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities) not applicable to the two (2) bilge gel coat process stations.

This is an existing requirement that has been changed during SSM No. 039-43777-00267 and SPM 039-43851-00267. The source has chosen to add BAO-P6, BAO-P2, and foam application to the VOC emission limit expressed in Condition (a). The modification of the limit is shown in bold above.

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 woodworking operation will emit less equal to or greater than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year for a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.
326 IAC 2-6 (Emission Reporting)
Since this source is required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program, this source is subject to 326 IAC 2-6 (Emission Reporting). In accordance with the compliance schedule in 326 IAC 2-6-3, an emission statement must be submitted triennially. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

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

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

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

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

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

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

326 IAC 6.8 (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>

**Boat Assembly Operations BAO-P2 and BAO-P6**

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
Even though BAO-P6 was constructed after January 1, 1980, it is not subject to the requirements of 326 IAC 8-1-6 because its unlimited VOC potential emissions are less than twenty-five (25) tons per year.

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
BAO-P2 was constructed after January 1, 1980, and its unlimited VOC potential emissions are equal to or greater than twenty-five (25) tons per year and the BAO-P2 is not regulated by other rules in 326 IAC 8. The source has opted to limit the potential to emit VOC from the BAO-P2 to less than twenty-five (25) tons per twelve (12) consecutive month period in order to render the requirements of 326 IAC 8-1-6 not applicable. Therefore, the BAO-P2 is not subject to the requirements of 326 IAC 8-1-6.
In order to render the requirements of 326 IAC 8-1-6 not applicable, Permittee shall comply with the following:

1. the putty compound input to the Plant 2 assembly operation (BAO-P2) shall not exceed 19,500 gallons per twelve (12) consecutive month period, with compliance determined at the end of each month.

2. the VOC content of the input putty compound shall not exceed 2.56 pounds per gallon of putty compound.

Compliance with this limit shall limit the potential to emit of VOC to less than twenty-five (25) tons per twelve (12) consecutive month period from BAO-P2 and shall render the requirements of 326 IAC 8-1-6 not applicable to BAO-P2.

This is a new requirement for the source. The source is changing the type of putty compound used in BAO-P2 with one that has a higher density and a higher weight percent organics.

326 IAC 20-48 (Emission Standards for Hazardous Air Pollutants for Boat Manufacturing)
BAO-P2 and BAO-P6 are not subject to the requirements of 326 IAC 20-48 because they are not open molding resin or gel coat operations.

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
Even though, the foam application was constructed after January 1, 1980, it is not subject to the requirements of 326 IAC 8-1-6 because its unlimited VOC potential emissions are less than twenty-five (25) tons per year.

326 IAC 20-48 (Emission Standards for Hazardous Air Pollutants for Boat Manufacturing)
Foam application is not subject to the requirements of 326 IAC 20-48 because they are not open molding resin or gel coat operations.

Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-7 are required to assure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions; however, these provisions do not always fulfill the requirement for a continuous demonstration. When this occurs, IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

If the Compliance Determination Requirements are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source’s failure to take the appropriate corrective actions within a specific time period.

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

Testing Requirements:

1. IDEM OAQ has determined that testing of the BAO-P2 is not required at this time to determine compliance with the VOC emission limits. IDEM has the authority to require testing at a later time if necessary to demonstrate compliance with any applicable requirement.
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. Section A.3 has been modified to reflect the changes of the putty application locations at Plant 2 and Plant 6.

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

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

   **Plant 6**

   ...

   *(g)* One (1) assembly operation, identified as **BAO-P6**, constructed in 2000, permitted in 2018, approved in 2021 for modification, consisting of 2 operational putty guns for bonding and filling, with a maximum capacity of 7.5 gallons per hour, no control, exhausting indoors.

   The 2021 modification is to add a second operational putty gun and a back up putty gun and to relocate from Plant 2 to Plant 6.

   One (1) short term back up putty gun apparatus will be kept in storage and will be used to temporarily replace either of the operational putty guns that might need to be taken offline for the purpose of repairing or performing maintenance on either of the operational putty guns.

   **Under 40 CFR 63, Subpart VVVV, all emission units are considered existing units in an existing affected source.**

   **Under 40 CFR 63, Subpart VVVV, all emission units are considered existing units in an existing affected source.**

   ...

   **Plant 2**

   *(a)* Plant 2 Boat Assembly Operations, identified as **BAO-P2**, consisting of:

   One (1) assembly operation, identified as identified as **BAO-P2**, constructed in 2000, **approved in 2021 to add a second putty gun**, with a maximum capacity of 1 unit per hour and 0.16 gallon per unit, utilizing one (1) portable glue gun and one (1) two (2) putty guns using polyester putty for caulking, hand held guns using urethane caulks and silicone sealants, and spray cans of adhesive, with a maximum capacity of 76,356 pounds/year, no control and exhausting indoors.

   **One (1) short term backup putty gun apparatus will be kept in storage and will be used to temporarily replace either of the operational putty guns that**
might need to be taken offline for the purpose of repairing or performing maintenance on either of the operational putty guns.

(2) One (1) assembly operation, constructed in 2000, permitted in 2018, consisting of putty for bonding and filling, no control, exhausting indoors.

Under 40 CFR 63, Subpart VVVV, all emission units are considered existing units in an existing affected source.

(2) Section A.4 has been modified to add the foam application.

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

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

... 

(e) One (1) foam application located in Plant 6, approved in 2021 for construction, with a maximum capacity of two tenths (0.20) gallon per hour, using no controls, and exhausting indoors.

Under 40 CFR 63, Subpart VVVV, all emission units are considered existing units in an existing affected source.

(3) Section D.1 has been modified to reflect the changes due to adding the two putty application processes and the foam application to the PSD avoidance limits. It has also been changed to reflect the changes due to adding a VOC limit to BAO-P2 to avoid the requirements of 326 IAC 8-1-6.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Plant 6

... 

(g) One (1) assembly operation, identified as BAO-P6, constructed in 2000, permitted in 2018, approved in 2021 for modification, consisting of 2 operational putty guns for bonding and filling, with a maximum capacity of 7.5 gallons per hour, no control, exhausting indoors.

The 2021 modification is to add a second operational putty gun and a back up putty gun and to relocate from Plant 2 to Plant 6.

One (1) short term back up putty gun apparatus will be kept in storage and will be used to temporarily replace either of the operational putty guns that might need to be taken offline for the purpose of repairing or performing maintenance on either of the operational putty guns.

Under 40 CFR 63, Subpart VVVV, all emission units are considered existing units in an existing affected source.
Under 40 CFR 63, Subpart VVVV, all emission units are considered existing units in an existing affected source.

... 

Plant 2

(a) Plant 2 Boat Assembly Operations, identified as BAO-P2, consisting of:

(1) One (1) assembly operation, identified as BAO-P2, constructed in 2000, approved in 2021 to add a second putty gun, with a maximum capacity of 1 unit per hour and 0.16 gallon per unit, utilizing one (1) portable glue gun, and one (1) two (2) putty guns using polyester putty for caulking, hand held guns using urethane caulks and silicone sealants, and spray cans of adhesive, with a maximum capacity of 76,356 pounds/year, no control and exhausting indoors. One (1) short term back up putty gun apparatus will be kept in storage and will be used to temporarily replace either of the operational putty guns that might need to be taken offline for the purpose of repairing or perform maintenance on either of the operational putty guns.

(2) One (1) assembly operation, constructed in 2000, permitted in 2018, consisting of putty for bonding and filling, no control, exhausting indoors.

Under 40 CFR 63, Subpart VVVV, all emission units are considered existing units in an existing affected source.

Insignificant Activities:

... 

(e) One (1) foam application located in Plant 6, approved in 2021 for construction, with a maximum capacity of two tenths (0.20) gallon per hour, using no controls, and exhausting indoors.

Under 40 CFR 63, Subpart VVVV, all emission units are considered existing units in an existing affected source.

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

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

D.1.1 Prevention of Significant Deterioration (PSD Minor Limit) VOC, PM, PM10 and PM2.5

[326 IAC 2-2]

In order to render 326 IAC 2-2 not applicable, the Permittee shall comply with the following:

(a)

(1) The use of resins and gel coats in the following facilities in Plant 6:

<table>
<thead>
<tr>
<th>Plant 6 Unit type</th>
<th>Unit ID</th>
</tr>
</thead>
<tbody>
<tr>
<td>gel coat booth</td>
<td>GEL BOOTH 2</td>
</tr>
<tr>
<td>gel coat booth</td>
<td>GEL BOOTH 1</td>
</tr>
<tr>
<td>fiberglass chop station</td>
<td>1st HULL CHOP</td>
</tr>
<tr>
<td>fiberglass chop station</td>
<td>1st DECK CHOP</td>
</tr>
<tr>
<td>fiberglass chop station</td>
<td>SMALL PRODUCTS CHOP</td>
</tr>
</tbody>
</table>
The use of putty and foam materials in the following facilities:

<table>
<thead>
<tr>
<th>Plant and Unit Type</th>
<th>Unit ID</th>
</tr>
</thead>
<tbody>
<tr>
<td>Plant 6 boat assembly operation</td>
<td>BAO-P6</td>
</tr>
<tr>
<td>Plant 6 Foam application</td>
<td>Foam application</td>
</tr>
<tr>
<td>Plant 2 boat assembly operation</td>
<td>BAO-P2</td>
</tr>
</tbody>
</table>

shall be limited such that the PTE of VOC shall not exceed one hundred and forty-four (144) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

D.1.5 VOC Emission Limitation [326 IAC 8-1-6]

In order to render the requirements of 326 IAC 8-1-6 not applicable, Permittee shall comply with the following:

1. the putty compound throughput to BAO-P2 shall not exceed 19,500 gallons per twelve (12) consecutive month period, with compliance determined at the end of each month.

2. the VOC emissions shall not exceed 2.56 pounds per gallon of putty compound.

Compliance with this limit shall limit the potential to emit of VOC to less than twenty-five (25) tons per twelve (12) consecutive month period from BAO-P2 and shall render the requirements of 326 IAC 8-1-6 not applicable to BAO-P2.

D.1.56 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

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

D.1.67 Volatile Organic Compounds [326 IAC 8-1-6]

Compliance with Conditions D.1.1, D.1.2, and D.1.3 and D.1.5 shall be determined based upon the following criteria:

(a) Compliance with the VOC content and usage limitations contained in Conditions D.1.1, D.1.2 and D.1.5 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" and "as applied" VOC data sheets or MSDS. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.
D.1.78 Particulate Control

In order to comply with Conditions D.1.2(c) and D.1.4, and to render 326 IAC 2-2 not applicable, the Permittee shall operate the dry filters at all times when one or more of the following are in operations:

D.1.89 Monitoring

The Permittee shall comply with the following:

... 

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

D.1.910 Record Keeping Requirements

(a) To document compliance with Conditions D.1.1, and D.1.2, and D.1.5, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC, PM, PM_{10}, and PM_{2.5} emission limits established in Conditions D.1.1, and D.1.2, and D.1.5.

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

2. A log of the dates of use;

3. The cleanup solvent usage for each month;

4. The total VOC usage for each month;

5. The weight of VOC emitted for each compliance period; and

(b) To document the compliance status with Condition D.1.89, the Permittee shall maintain a log of weekly overspray observations, and daily inspections. The Permittee shall include in its daily record when a weekly observation, daily or monthly inspection is not taken and the reason for the lack of observations and inspections, (i.e. the process did not operate that day).

D.1.1011 Reporting Requirements

A quarterly summary of the information to document the compliance status with Conditions D.1.1, and D.1.2, and D.1.5 shall be submitted using the reporting forms located at the end of this permit, or their equivalent, not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting Requirements contains the Permittee’s obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

(4) Section E.1 has been modified to reflect the changes to the two (2) assembly operations and the addition of the foam application:
SECTION E.1  NESHAP

Emissions Unit Description:

Plant 6

... (g) One (1) assembly operation, identified as BAO-P6, constructed in 2000, permitted in 2018, approved in 2021 for modification, consisting of 2 operational putty guns for bonding and filling, with a maximum capacity of 7.5 gallons per hour, no control, exhausting indoors.

The 2021 modification is to add a second operational putty gun and a backup putty gun and to relocate from Plant 2 to Plant 6.

One (1) short term back up putty gun apparatus will be kept in storage and will be used to temporarily replace either of the operational putty guns that might need to be taken offline for the purpose of repairing or performing maintenance on either of the operational putty guns.

Under 40 CFR 63, Subpart VVVV, all emission units are considered existing units in an existing affected source.

Under 40 CFR 63, Subpart VVVV, all emission units are considered existing units in an existing affected source.

... Plant 2

(2) One (1) assembly operation, constructed in 2000, permitted in 2018, consisting of putty for bonding and filling, no control, exhausting indoors.

Under 40 CFR 63, Subpart VVVV, all emission units are considered existing units in an existing affected source.

Insignificant Activities:

... (e) One (1) foam application located in Plant 6, approved in 2021 for construction, with a maximum capacity of two tenths (0.20) gallon per hour, using no controls, and exhausting indoors.

Under 40 CFR 63, Subpart VVVV, all emission units are considered existing units in an existing affected source.

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)
(5) One (1) quarterly report was added to the permit for the record keeping and reporting for the putty compound throughput for BAO-P2.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH

Quarterly Report

Source Name: Highwater Marine, LLC dba Godfrey Marine
Source Address: 4500 Middlebury Street, Elkhart, Indiana 46516
FESOP Permit No.: 039-43777-00267
Facility: Plant 2 assembly operation (BAO-P2)
Parameter: Putty Compound throughput
Limit: Shall not exceed 19,500 gallons per twelve (12) month consecutive period with compliance determined at the end of each month.

<table>
<thead>
<tr>
<th>QUARTER:</th>
<th>YEAR:</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Month</th>
<th>Column 1</th>
<th>Column 2</th>
<th>Column 1 + Column 2</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Column 1</td>
<td>previous 11 months</td>
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<td>This Month (tons)</td>
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<td>(tons)</td>
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</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: ________________________________
(6) The quarterly report used to report the VOC usage (PSD minor limit) was updated to include BAO-P6, BAO-P2, and foam application in the facility list:

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<thead>
<tr>
<th>Facility:</th>
<th>Plant 6 Unit type</th>
<th>Unit ID</th>
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<tbody>
<tr>
<td>gel coat booth</td>
<td>GEL BOOST 2</td>
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<td>gel coat booth</td>
<td>GEL BOOTH 1</td>
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<td>fiberglass chop station</td>
<td>1st HULL CHOP</td>
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<tr>
<td>fiberglass chop station</td>
<td>1st DECK CHOP</td>
<td></td>
</tr>
<tr>
<td>fiberglass chop station</td>
<td>SMALL PRODUCTS CHOP</td>
<td></td>
</tr>
<tr>
<td>fiberglass chop station</td>
<td>2nd DECK CHOP A</td>
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</tr>
<tr>
<td>fiberglass chop station</td>
<td>2nd DECK CHOP B</td>
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</tr>
<tr>
<td>fiberglass chop station</td>
<td>PORTABLE CHOP</td>
<td></td>
</tr>
<tr>
<td>fiberglass chop station</td>
<td>BULK HULL CHOP</td>
<td></td>
</tr>
<tr>
<td>fiberglass chop station</td>
<td>STRINGER STATION 1 CHOP</td>
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<td>fiberglass chop station</td>
<td>STRINGER STATION 2 CHOP</td>
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</tr>
<tr>
<td>bilge gel coat process station</td>
<td>BILGE GEL 2</td>
<td></td>
</tr>
<tr>
<td>bilge gel coat process station</td>
<td>BILGE GEL 1</td>
<td></td>
</tr>
<tr>
<td>Plant 6 boat assembly operation</td>
<td>BAO-P6</td>
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<td>Plant 6 assembly operation</td>
<td>Foam application</td>
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<tr>
<td>Plant 2 boat assembly operation</td>
<td>BAO-P2</td>
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(7) The Source Address was changed throughout the permit to include all the addresses listed under the Source Definition.

**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,

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.7 - Asbestos Abatement Projects of the permit has been revised as follows:

C.7 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).

... 

**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 February 19, 2021.

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Source Modification No. 039-43777-00267. The operation of this proposed
modification shall be subject to the conditions of the attached proposed Significant Permit Modification No. 039-43851-00267.

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

**IDEM Contact**

(a) If you have any questions regarding this permit, please contact 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/](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: [https://www.in.gov/idem/airpermit/public-participation/](https://www.in.gov/idem/airpermit/public-participation/); and the Citizens' Guide to IDEM on the Internet at: [https://www.in.gov/idem/resources/citizens-guide-to-idem/](https://www.in.gov/idem/resources/citizens-guide-to-idem/).
## UNLIMITED POTENTIAL TO EMIT IN TONS PER YEAR

<table>
<thead>
<tr>
<th>Emission Unit/Operation</th>
<th>PM</th>
<th>PM10</th>
<th>PM2.5</th>
<th>SO2</th>
<th>NOx</th>
<th>VOC</th>
<th>CO</th>
<th>HAP- hexane</th>
<th>HAP- manganese</th>
<th>HAP- Styrene</th>
<th>HAP - Methyl Methacrylate</th>
<th>All HAPs</th>
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<td>17.72</td>
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### LIMITED POTENTIAL TO EMIT IN TONS PER YEAR

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</tbody>
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### Appendix A: Emissions Calculations

**Company Name:** Highwater Marine LLC, dba Godfrey Marine  
**Address City IN Zip:** 4500 Middlebury Street, Elkhart, IN 46516  
**Operating Permit No.:** T039-39228-00267  
**Significant Source Modification No.:** 039-43777-00267  
**Significant Permit Modification No.:** 039-43851-00267  
**Reviewer:** Alexandra Neusarling

---

1. 326 IAC 2-2 PSD minor limits for PM, PM10, PM2.5
2. 326 IAC 2-2 PSD minor limit for VOC of 144 tpy (Boat Assembly Operations were added to the limit during SMSMPA 039-43777/00267/039-43851-00267
3. 326 IAC 8-1-6 VOC BACT total of 200 tpy (limit established in 2000 and remained the same even though the PSD minor limit has been revised/lowered).
4. 326 IAC 2-2 PSD VOC to render 326 IAC 8-1-6 VOC not applicable, total of 15 tons per year for both bilge gel coat process stations (BILGE GEL 2 and BILGE GEL 1)
### Appendix A: Emissions Calculations

**SSM 43777 & 43581SPM Summary**

**Company Name:** Highwater Marine LLC, dba Godfrey Marine  
**Address City IN Zip:** 4500 Middlebury Street, Elkhart, IN 46516  
**Operating Permit No.:** T039-39228-00267  
**Significant Source Modification No.:** 039-43777-00267  
**Significant Permit Modification No.:** 039-43851-00267  
**Reviewer:** Alexandrea Neuzerling

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<th>VOC</th>
<th>CO</th>
<th>Single HAP</th>
<th>Total HAPs</th>
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<th>CO</th>
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<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 HAPs</th>
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<td>Cor-Grip Compound (Plant 2)</td>
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<td>7.09</td>
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<td>Cor-Grip Reinforced Fillet Compound (Plant 6)</td>
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<td>8.77</td>
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<td>-----</td>
<td>1.29</td>
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</table>

**PTE Increased of the Modification (tons/yr) (Sum of the PTE Increased of Each Emission Unit)**

<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>Single HAP</th>
<th>Total HAPs</th>
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<tbody>
<tr>
<td>Cor-Grip Compound (Plant 2)</td>
<td>-----</td>
<td>-----</td>
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<td>-----</td>
<td>-----</td>
<td>-----</td>
<td>-----</td>
<td>81.44</td>
<td>7.09</td>
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<tr>
<td>Cor-Grip Reinforced Fillet Compound (Plant 6)</td>
<td>-----</td>
<td>-----</td>
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<td>-----</td>
<td>8.77</td>
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<td>1.29</td>
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</table>

**Total PTE Increase of Modification:** 91.50 7.09 7.09

--

*PDR Bonding Putty removed and replaced with Cor-Grip Compound  
**3M Fillet Putty removed and replaced with Cor-Grip Reinforced Fillet Compound
### Facility Units Produced Throughput

<table>
<thead>
<tr>
<th>Facility</th>
<th>Units Produced</th>
<th>Throughput (lbs/hr)</th>
<th>Emission Factor (lbs/ton)</th>
<th>PM/PM10/PM2.5 (lbs/hr)</th>
<th>PM/PM10/PM2.5 (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>CNC Router - Woodworking</td>
<td>Stringers</td>
<td>262.20</td>
<td>0.35</td>
<td>0.05</td>
<td>0.20</td>
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<tr>
<td>(Plant 6)</td>
<td>Pontoon Decks</td>
<td>58.27</td>
<td>0.35</td>
<td>0.01</td>
<td>0.04</td>
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</table>

**Notes**
- CNC machine is equipped with baghouse for particulate control
- Emission factor used in calculations is from AP-42, 4th Edition, September 2985, Table 10.3-1
- Sawdust density (lbs/ft³) = 13.11

**Methodology**
- Assumption PM=PM10=PM2.5
- Potential to Emit Before Control
  - Potential Emissions of PM/PM10/PM2.5 (lbs/hr) = Throughput (lbs/hr) * Emission factor (lbs/ton) / 2000 (lbs/ton)
  - Potential Emissions of PM/PM10/PM2.5 (tons/yr) = Potential Emissions of PM/PM10/PM2.5 (lbs/hr) * 8760 (hrs/yr) * (1 ton/2000 lbs)
- Potential to Emit After Control
  - Potential Emissions of PM/PM10/PM2.5 (lbs/hr) = Uncontrolled Potential Emissions of PM/PM10/PM2.5 (lbs/hr) * (1 - Control Efficiency)
  - Potential Emissions of PM/PM10/PM2.5 (tons/yr) = Controlled Potential Emissions of PM/PM10/PM2.5 (lbs/hr) * 8760 (hrs/yr) * (1 ton/2000 lbs)
Appendix A: Emissions Calculations
Reinforced Plastics and Composites
Open Molding Operations*

Gel Coat Usage - General Lamination Department Plant 6
Gel Coat Booths (GEL BOOTH 1 and GEL BOOTH 2)

Company Name: Highwater Marine LLC, dba Godfrey Marine
Address City IN Zip: 4500 Middlebury Street, Elkhart, IN 46516
Operating Permit No.: T039-39228-00267
Significant Source Modification No.: 039-43777-00267
Significant Permit Modification No.: 039-43851-00267
Reviewer: Alexandrea Neuzerling

* Open Molding Operations include the following: manual application, mechanical application, gel coat application, and filament application.

Gel coat booths use FIT nonatomized spray guns with a transfer efficiency of 95%, updated with renewal T039-39228-00267
Gel coat booths are equipped with dry filters for particulate control

**METHODOLOGY**
With renewal T039-39228-00267, the booths have been updated with new coatings and the UEF emission factor has been updated to reflect the correct spray gun type.

Styrene UEF (for Mechanical Non-Atomized) = ((0.4506 * %styrene) - 0.0505) * 2000
MMA UEF from Unified Emission Factors for Open Molding of Composites for Gel Coat Application
UEF formula from Unified Emission Factors for Open Molding of Composites
Potential VOC (lb/hr) for resins or gels = Total Maximum throughput (lbs/hr) * UEF (lb monomer/ton material) * 1 ton material/2000 lbs material
Potential VOC (ton/year) = Potential VOC (lb/hr) * 8760 hrs/year * (1 ton/2000 lb)
Potential PM (ton/year) = (1 - Weight % monomer or VOC) * Maximum throughput * (1 - transfer efficiency) * 8760 hrs/year * (1 ton/2000 lb)
Limited Potential PM (ton/year) = Potential PM (tons/yr) from each unit * (1 - %control efficiency)
Assumption PM = PM10 = PM2.5

No testing is required for this gel coat booths at this time, since the control efficiency of 95% is reasonable and compliance monitoring is sufficient to demonstrate compliance with the limits

---

### Material (Resin or Gel Name)

<table>
<thead>
<tr>
<th>Material</th>
<th>Monomer</th>
<th>Density (Lb/Gal)</th>
<th>Weight % Monomer</th>
<th>Maximum Throughput (lbs/hr/unit)</th>
<th>Number of Identical Booths</th>
<th>Total Maximum Throughput (lbs/hr)</th>
<th>UEF (lbs monomer/resin or gel)</th>
<th>Potential VOC/HAP (lbs/hr)</th>
<th>Potential VOC/HAP (tons/yr)</th>
<th>Transfer Efficiency</th>
<th>Potential PM (tons/yr)</th>
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<tbody>
<tr>
<td>Black Gel Coat</td>
<td>Styrene</td>
<td>9.7</td>
<td>29.79%</td>
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<td>2.0</td>
<td>992.000</td>
<td>167.47</td>
<td>83.06</td>
<td>363.82</td>
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<td>146.64</td>
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<td>40.65</td>
<td>20.16</td>
<td>88.31</td>
<td>95%</td>
<td>146.66</td>
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<td>29.71%</td>
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<td>2.0</td>
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<td>992.000</td>
<td>44.70</td>
<td>22.10</td>
<td>96.78</td>
<td>95%</td>
<td>153.96</td>
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<td>992.000</td>
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<td>2.0</td>
<td>992.000</td>
<td>159.81</td>
<td>79.26</td>
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<td>2.78%</td>
<td>496.0</td>
<td>2.0</td>
<td>992.000</td>
<td>41.70</td>
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<td>95%</td>
<td>148.34</td>
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<td>62.68</td>
<td>274.54</td>
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<td>155.94</td>
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<td>Methyl Methacrylate</td>
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<td>2.99%</td>
<td>496.0</td>
<td>2.0</td>
<td>992.000</td>
<td>44.85</td>
<td>22.25</td>
<td>97.44</td>
<td>95%</td>
<td>155.94</td>
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<td>75.38</td>
<td>330.14</td>
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<td>151.03</td>
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<td>36.15</td>
<td>17.93</td>
<td>78.54</td>
<td>95%</td>
<td>151.03</td>
<td></td>
</tr>
</tbody>
</table>

Worst Case VOC and PM per booth: 226.42 78.15
Worst Case HAP (styrene) per booth: 181.91

Controlled After 95%: 3.91
Appendix A: Emissions Calculations  
Reinforced Plastics and Composites  
Open Molding Operations*  
Resin Usage - General Lamination Flow coating Plant 6  
Nine (9) Fiberglass Chop Booths  

Company Name: Highwater Marine LLC, dba Godfrey Marine  
Address City IN Zip: 4500 Middlebury Street, Elkhart, IN 46516  
Operating Permit No.: T039-39228-00267  
Significant Source Modification No.: 039-43777-00267  
Significant Permit Modification No.: 039-43851-00267  
Reviewer: Alexandrea Neuzerling

<table>
<thead>
<tr>
<th>Material (Resin or Gel Name)</th>
<th>Monomer</th>
<th>Density (Lb/Gal)</th>
<th>Weight % Monomer</th>
<th>Maximum Throughput (lbs/hr/unit)</th>
<th>Number of Identical Units</th>
<th>Total Maximum Throughput (lbs/hr)</th>
<th>UEF (lbs monomer/ton resin or gel)</th>
<th>Potential VOC/HAP (lbs/hr)</th>
<th>Potential VOC/HAP (tons/yr)</th>
<th>Transfer Efficiency</th>
<th>Potential PM (tons/yr)</th>
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<tbody>
<tr>
<td>Aropol Q 67700 Resin</td>
<td>Styrene</td>
<td>9.0</td>
<td>33.40%</td>
<td>525.0</td>
<td>9.0</td>
<td>6825.00</td>
<td>71.88</td>
<td>245.28</td>
<td>1074.32</td>
<td>100%</td>
<td>0.00</td>
</tr>
<tr>
<td>AME 1001 Resin</td>
<td>Styrene</td>
<td>9.0</td>
<td>34.02%</td>
<td>525.0</td>
<td>9.0</td>
<td>4725.00</td>
<td>73.81</td>
<td>174.37</td>
<td>763.75</td>
<td>100%</td>
<td>0.00</td>
</tr>
</tbody>
</table>

Worst Case VOC/HAP            | 1074.32 | 0.00             |

* Open Molding Operations include the following: manual application, mechanical application, gel coat application, and filament application.  
Chop booths use flow coating  
Chop booths are equipped with dry filters for particulate control.

METHODOLOGY
With renewal T039-39228-00267, the booths have been updated with new coatings and the UEF emission factor has been updated to reflect the correct styrene emission factors.  
Styrene UEF from Unified Emission Factors for Open Molding of Composites for Mechanical Non-Atomized Application  
Potential VOC (lb/hr) = Maximum throughput (unit/hr) * identical units (units) * UEF (lb monomer/ton material) * 1 ton material/2000 lbs material  
Potential VOC (tons/yr) = (Maximum throughput (unit/hr) * identical units (units) * UEF (lb monomer/ton material) * 8760 hrs/yr 1 ton material/2000 lbs material)/ 2,000 lbs/ton  
Potential PM (ton/year) = (1 - Weight % monomer or VOC) * Maximum throughput * (1 - transfer efficiency) * 8760 hrs/year * (1 ton/2000 lb)
**Appendix A: Emissions Calculations**

**Form DD: Reinforced Plastics and Composites**

**Open Molding Operations**

**Gel Coat Usage - Bilge Coating Plant 6**

*Open Molding Operations* include the following: manual application, mechanical application, gel coat application, and filament application. Bilge coat booths use FIT nonatomized spray guns with a transfer efficiency of 95%, updated with renewal T039-39228-00267. Bilge coat booths are equipped with dry filters for particulate control.

**Bilge Gel Coat**

<table>
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<tr>
<th>Process Station</th>
<th>Material (Resin or Gel Name)</th>
<th>Monomer</th>
<th>Density (Lb/Gal)</th>
<th>Weight % Monomer</th>
<th>Gal of Mat. (lb/unit)</th>
<th>Maximum usage (lb/unit/hour)</th>
<th>Maximum usage (lb/hour)</th>
<th>UEF (lbs monomer/ton resin or gel)</th>
<th>Potential VOC/HAP (lbs/hr)</th>
<th>Potential VOC/HAP (tons/yr)</th>
<th>Transfer Efficiency</th>
<th>Potential PM (tons/yr)</th>
<th>Controlled PM at 95% Control Efficiency (tons/yr)</th>
</tr>
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<tbody>
<tr>
<td>BILGE GEL 2</td>
<td>Glacier BD</td>
<td>Styrene</td>
<td>9.0</td>
<td>25.09%</td>
<td>330.7</td>
<td>1.3</td>
<td>413.33</td>
<td>125.11</td>
<td>25.86</td>
<td>113.25</td>
<td>95%</td>
<td>65.09</td>
<td>3.25</td>
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<tr>
<td></td>
<td>Bilge Gel</td>
<td>Methyl Methacrylate</td>
<td>9.0</td>
<td>3.00%</td>
<td>330.7</td>
<td>1.3</td>
<td>413.33</td>
<td>44.55</td>
<td>9.21</td>
<td>40.33</td>
<td>95%</td>
<td>113.25</td>
<td>65.09</td>
</tr>
<tr>
<td>Total VOC/HAP and PM from Gel Coat Use</td>
<td><strong>153.58</strong></td>
<td><strong>65.09</strong></td>
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<td></td>
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<td></td>
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<td></td>
</tr>
<tr>
<td>Worst HAP and PM from Gel Coat Use</td>
<td><strong>113.25</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>BILGE GEL 1</td>
<td>Glacier BD</td>
<td>Styrene</td>
<td>9.0</td>
<td>25.09%</td>
<td>330.7</td>
<td>1.3</td>
<td>413.33</td>
<td>125.11</td>
<td>25.86</td>
<td>113.25</td>
<td>95%</td>
<td>65.09</td>
<td>3.25</td>
</tr>
<tr>
<td></td>
<td>Bilge Gel</td>
<td>Methyl Methacrylate</td>
<td>9.0</td>
<td>3.00%</td>
<td>330.7</td>
<td>1.3</td>
<td>413.33</td>
<td>44.55</td>
<td>9.21</td>
<td>40.33</td>
<td>95%</td>
<td>113.25</td>
<td>65.09</td>
</tr>
<tr>
<td>Total VOC/HAP and PM from Gel Coat Use</td>
<td><strong>153.58</strong></td>
<td><strong>65.09</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Worst HAP and PM from Gel Coat Use</td>
<td><strong>113.25</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

* Open Molding Operations include the following: manual application, mechanical application, gel coat application, and filament application.

**METHODOLOGY**

With SSM 039-39230-00267, an existing bilge gel coat station (BILGE GEL 1) has been added and the booths have been updated with new coatings. With renewal T039-39228-00267, the UEF emission factor has been updated to reflect the correct spray gun type.

Styrene UEF (for Mechanical Non-Atomized) = 0.4506 * %stylene - 0.0505 - 2000

Potential VOC (lb/hr) for resins or gels = Maximum usage (lbs/hr) * UEF (lb styrene/ton material) * 1 ton material/2000 lbs material

Potential VOC (ton/year) = Potential VOC (lb/hr) * 8760 hrs/year * (1 ton/2000 lb)

Potential PM (ton/year) = (1 - Weight % monomer or VOC) * Maximum Usage * (1 - transfer efficiency) * 8760 hrs/year * (1 ton/2000 lb)

Limited Potential PM (ton/year) = Potential PM (tons/yr) * (1 - %control efficiency)

Assumption PM = PM10 = PM2.5

No testing is required since the control efficiency of 95% is reasonable and the compliance monitoring is sufficient to demonstrate compliance with the limit.
### VOC Emission Calculations

#### Plant 6 (Touch-up and repair)

**Company Name:** Highwater Marine LLC, dba Godfrey Marine  
**Address City IN Zip:** 4500 Middlebury Street, Elkhart, IN 46516  
**Operating Permit No.:** T039-39228-00267  
**Significant Source Modification No.:** 039-43777-00267  
**Significant Permit Modification No.:** 039-43851-00267  
**Reviewer:** Alexandrea Neuzerling

<table>
<thead>
<tr>
<th>Material</th>
<th>Density (Lb/Gal)</th>
<th>Gallons of Material (gal/unit)</th>
<th>Maximum (unit/hour)</th>
<th>Weight % VOC</th>
<th>VOC Emissions (ton/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Zyvax Fiberglass Shield</td>
<td>7.31</td>
<td>0.625000</td>
<td>0.40</td>
<td>90.00%</td>
<td>7.20</td>
</tr>
<tr>
<td>Zyvax Surface Cleaner</td>
<td>7.05</td>
<td>1.000000</td>
<td>0.05</td>
<td>100.00%</td>
<td>1.54</td>
</tr>
<tr>
<td>Zyvax Sealer GP</td>
<td>7.31</td>
<td>0.750000</td>
<td>0.05</td>
<td>98.00%</td>
<td>1.18</td>
</tr>
</tbody>
</table>

**Total Potential Emissions**  

**9.92**

**METHODOLOGY**

VOC emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % VOC * 8760 hrs/yr * 1 ton/2000 lbs  
Zyvax Fiberglass Shield calculated to last for four (4) pulls over a ten (10) hour day.  
Zyvax Surface Cleaner used to strip molds that need repair. This usage is estimated at one (1) repair every other day (20 hours of production).  
Zyvax Sealer GP used to reseal molds that have been repaired. This usage is estimated at one (1) repair every other day (20 hours of production).
Appendix A: Emissions Calculations

Grinding Operations Plant 6

Company Name: Highwater Marine LLC, dba Godfrey Marine
Address City IN Zip: 4500 Middlebury Street, Elkhart, IN 46516
Operating Permit No.: T039-39228-00267
Significant Source Modification No.: 039-43777-00267
Significant Permit Modification No.: 039-43851-00267
Reviewer: Alexandrea Neuzerling

<table>
<thead>
<tr>
<th>Facility</th>
<th>Maximum Process (pounds/hr)</th>
<th>Emission Factor* (lb/lbs)</th>
<th>Control Efficiency (%)</th>
<th>(lbs/hr)</th>
<th>(tons/yr)</th>
<th>(lbs/hr)</th>
<th>(tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Grinding Booth - Plant 6</td>
<td>543</td>
<td>0.0013</td>
<td>95.0%</td>
<td>14.12</td>
<td>61.84</td>
<td>0.71</td>
<td>3.09</td>
</tr>
<tr>
<td>Total</td>
<td></td>
<td></td>
<td></td>
<td>14.12</td>
<td>61.84</td>
<td>0.71</td>
<td>3.09</td>
</tr>
</tbody>
</table>

Grinding booths are equipped with dry filters for particulate control

Methodology

Assumption PM=PM10=PM2.5

*Emission Factor is from permit number T039-19656-00267, issued June 4, 2008.

Potential to Emit After Control:
Potential Emissions of PM/PM10/PM2.5 (lb/hr) = Maximum process (lbs/hr)*EF(lb/lbs)
Potential Emissions of PM/PM10/PM2.5 (tons/yr) = Maximum process (lbs/hr)*EF(lb/lbs)*8760(hrs/yr)*(1 ton/2000 lbs)

Potential to Emit Before Control:
Potential Emissions of PM/PM10/PM2.5 (lb/hr) = Maximum process (lbs/hr)*EF(lb/lbs)/(1-Control Efficiency)
Potential Emissions of PM/PM10/PM2.5 (tons/yr) = PTE uncontrolled (lbs/hr)*8760 (hrs/yr) * (1 ton/2000 lbs)

326 IAC 6-3-2 Allowable Rate of Emissions

<table>
<thead>
<tr>
<th>Facility</th>
<th>Process Rate (lbs/hr)</th>
<th>Process Weight Rate (tons/hr)</th>
<th>Limit 326 IAC 6-3-2 (lbs/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Grinding Booth</td>
<td>543</td>
<td>0.27</td>
<td>1.71</td>
</tr>
</tbody>
</table>

Methodology

E = 4.10P^{0.67} Where E = rate of emissions in lbs/hr and P = maximum process weight rate in tons/hr
Appendix A: Emission Calculations
Woodworking

Company Name: Highwater Marine LLC, dba Godfrey Marine
Address City IN Zip: 4500 Middlebury Street, Elkhart, IN 46516
Operating Permit No.: T039-39228-00267
Significant Source Modification No.: 039-43777-00267
Significant Permit Modification No.: 039-43851-00267
Reviewer: Alexandrea Neuzerling

<table>
<thead>
<tr>
<th>Unit</th>
<th>Outlet Grain Loading (grains/acf)</th>
<th>Gas Flow Rate (acfm.)</th>
<th>Control Efficiency (%)</th>
<th>Before Control (lbs/hr)</th>
<th>After Control (tons/yr)</th>
<th>Before Control (lbs/hr)</th>
<th>After Control (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Plant 79 woodworking five (5) machines</td>
<td>0.00043</td>
<td>5,000</td>
<td>99.99%</td>
<td>186.00</td>
<td>0.02</td>
<td>814.7</td>
<td>0.08</td>
</tr>
<tr>
<td>Plant 6 woodworking two (2) machines</td>
<td>0.00043</td>
<td>5,000</td>
<td>99.99%</td>
<td>186.00</td>
<td>0.02</td>
<td>814.7</td>
<td>0.08</td>
</tr>
</tbody>
</table>

Total of 7 woodworking machines: 372.0 1,629.4 0.04 0.16

All machines equipped with integral baghouse collectors for particulate control

Methodology
Assumption PM=PM10=PM2.5

Controlled PTE
Potential to emit of PM (lbs/hr) (after control) = outlet grains loading (grains/cub. ft.) * 1/7,000 (lbs/grains) * Flow rate (cub. ft./minute) * 60 (minute/hour)
Potential to emit of PM (tons/yr) (after control) = Potential to emit of PM after control (lbs/hr) * 8760 (hrs/yr) * 1/2000 (ton/lb)

Uncontrolled PTE
Potential to emit of PM (lbs/hr) (before control) = outlet grains loading (grains/cub. ft.) * 1/7,000 (lbs/grains) * Flow rate (cub. ft./minute) * 60 (minute/hour) / (1-%control efficiency)
Potential to emit of PM (tons/yr) (before control) = Potential to emit of PM (lbs/hr) * 8760 (hrs/yr) * 1/2000 (ton/lb) / (1-%control efficiency)

IDEM, OAQ has determined that the baghouse used for PM/PM10 control of the woodworking operations at this stationary fiberglass and aluminum boat manufacturing facility is an integral part of the woodworking operation. Therefore, the permitting level will be determined using the potential to emit after the applicable controls. Operating conditions in the proposed permit will specify that the baghouse shall operate at all times when the woodworking operation is in operation.

Allowable Rate of Emissions (326 IAC 6-3-2)

<table>
<thead>
<tr>
<th>Woodworking</th>
<th>Process Weight Rate (lbs/hr)</th>
<th>Allowable 326 IAC 6-3-2 (lbs/hr)</th>
<th>Controlled PM/PM10/PM2.5 (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Plant 79</td>
<td>874.80</td>
<td>2.36</td>
<td>0.08</td>
</tr>
<tr>
<td>Plant 6</td>
<td>729.00</td>
<td>2.09</td>
<td>0.08</td>
</tr>
</tbody>
</table>

Methodology
Allowable Emissions = 4.10(Process Weight Rate)^0.67
Limited 326 IAC 2-2 (ton/year) = Limited (lb/hr) * 8760 hrs/year * (1 ton/2000 lb)
Appendix A: Emission Calculations

VOC Emission Calculations

Plant 2 Assembly Operation - Adhesives

Company Name: Highwater Marine LLC, dba Godfrey Marine
Address City IN Zip: 4500 Middlebury Street, Elkhart, IN 46516
Operating Permit No.: T039-39228-00267
Significant Source Modification No.: 039-43777-00267
Significant Permit Modification No.: 039-43851-00267
Reviewer: Alexandrea Neuzerling

<table>
<thead>
<tr>
<th>Material</th>
<th>Density (Lb/Gal)</th>
<th>Gallons of Material (gal/unit)</th>
<th>Maximum (unit/hour)</th>
<th>Weight % VOC</th>
<th>VOC Emissions (ton/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sea Grip 5000 Adhesive</td>
<td>6.83</td>
<td>0.160000</td>
<td>1.00</td>
<td>81.40%</td>
<td>3.90</td>
</tr>
<tr>
<td>In Line Super Tack Polytack III Adhesive</td>
<td>5</td>
<td>0.160000</td>
<td>1.00</td>
<td>51.60%</td>
<td>1.81</td>
</tr>
</tbody>
</table>

Total Potential VOC Emissions 5.70

METHODOLOGY

VOC emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % VOC * 8760 hrs/yr * 1 ton/2000 lbs

With renewal 039-39228-00267, per email from source dated 12/6/17, there is no longer material used that contains HAP
## Appendix A: Emissions Calculations

### Marine Furniture Assembly - Plant 79 Lippert Adhesives

**Company Name:** Highwater Marine LLC, dba Godfrey Marine  
**Address City IN Zip:** 4500 Middlebury Street, Elkhart, IN 46516  
**Operating Permit No.:** T039-39228-00267  
**Significant Source Modification No.:** 039-43777-00267  
**Significant Permit Modification No.:** 039-43851-00267  
**Reviewer:** Alexandrea Neuzerling

<table>
<thead>
<tr>
<th>Unit</th>
<th>Material</th>
<th>Density (lb/gal)</th>
<th>Weight % VOC</th>
<th>Weight % HAP</th>
<th>Maximum Material Usage (gal/unit)</th>
<th>Maximum Throughput (units/hr) per station</th>
<th>Number of identical units</th>
<th>Total Maximum Throughput (units/hr)</th>
<th>VOC Content (lb/gal)</th>
<th>Potential to Emit VOC (lbs/hr)</th>
<th>Potential to Emit VOC (tons/yr)</th>
<th>Transfer Efficiency</th>
<th>Potential to Emit PM (lb/hr)</th>
<th>Potential to Emit PM (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Thirty (31) Adhesive Application Stations (ES1 - ES31)</td>
<td>Everstrong Spray ES20</td>
<td>6.42</td>
<td>55%</td>
<td>0%</td>
<td>0.06</td>
<td>1.45</td>
<td>31</td>
<td>44.95</td>
<td>3.53</td>
<td>9.53</td>
<td>41.72</td>
<td>75%</td>
<td>1.95</td>
<td>8.53</td>
</tr>
</tbody>
</table>

**Notes**  
Material Specifications (density, VOC content, etc) = as supplied by MSDSs  
Material usage per part = supplied by client

**Methodology**  
VOC (lbs) per Coating (gal) less H$_2$O = Density (lbs/gal) x Weight % (Organics) / (1 - Volume % [H$_2$O])  
VOC Content (lbs/gal) = Density (lbs/gal) x Weight % (Organics)  
Potential to Emit VOC (lbs/hr) = Usage (gal/unit) x Total Throughput (units/hr) x VOC Content (lbs/gal)  
Potential to Emit VOC (lbs/day) per station = Potential to Emit VOC (lbs/hr) * 24 (hr/day) / 31 stations  
Potential to Emit VOC (tons/yr) = Potential to Emit VOC (lbs/day) x 365 (days/yr) / 2,000 (lbs/ton)  
Potential to Emit Particulate (lbs/hr) = Usage (gal/unit) x Total Throughput (units/hr) x VOC Content (lbs/gal) x (1 - Weight % VOC) x (1 - Transfer Efficiency)  
Potential to Emit Particulate (lbs/day) per station = Potential to Emit Particulate (lbs/hr) * 24 (hr/day) / 31 stations  
Potential to Emit Particulate (tons/yr) = Potential to Emit Particulate (lbs/hr) * 365 (days/yr) / 2,000 (lbs/ton)
Appendix A: Emissions Calculations
Welding and Thermal Cutting

Company Name: Highwater Marine LLC, dba Godfrey Marine
Address City IN Zip: 4500 Middlebury Street, Elkhart, IN 46516
Operating Permit No.: T039-39228-00267
Significant Source Modification No.: 039-43777-00267
Significant Permit Modification No.: 039-43851-00267
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>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td>PM = PM10</td>
<td>Mn</td>
<td>Ni</td>
</tr>
<tr>
<td>WELDING</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Plant 1</td>
<td>Metal Inert Gas (MIG)(carbon steel)</td>
<td>15</td>
<td>1.23</td>
<td>0.0055</td>
<td>0.0005</td>
</tr>
<tr>
<td></td>
<td>Tungsten Inert Gas (TIG)(carbon steel)</td>
<td>10</td>
<td>0.4</td>
<td>0.0055</td>
<td>0.0005</td>
</tr>
<tr>
<td></td>
<td>Seam Welders</td>
<td>2</td>
<td>1.23</td>
<td>0.0055</td>
<td>0.0005</td>
</tr>
<tr>
<td>Plant 3</td>
<td>Metal Inert Gas (MIG)(carbon steel)</td>
<td>3</td>
<td>1.23</td>
<td>0.0055</td>
<td>0.0005</td>
</tr>
<tr>
<td></td>
<td>Tungsten Inert Gas (TIG)(carbon steel)</td>
<td>12</td>
<td>0.4</td>
<td>0.0055</td>
<td>0.0005</td>
</tr>
<tr>
<td>Plant 6</td>
<td>Metal Inert Gas (MIG)(carbon steel)</td>
<td>1</td>
<td>1.23</td>
<td>0.0055</td>
<td>0.0005</td>
</tr>
</tbody>
</table>

**EMISSION TOTALS**

| Potential Emissions lbs/hr | 0.19 | 0.02 | 0.00 | 0.00 | 0.02 |
| Potential Emissions lbs/day | 4.57 | 0.42 | 0.00 | 0.00 | 0.42 |
| Potential Emissions tons/year | 0.83 | 0.08 | 0.00 | 0.00 | 0.08 |

*Emission Factors are default values for carbon steel unless a specific electrode type is noted in the Process column.
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
Natural Gas Combustion Only
MM BTU/hr <100

Company Name: Highwater Marine LLC, dba Godfrey Marine
Address City In Zip: 4500 Middlebury Street, Elkhart, IN 46516
Operating Permit No.: 7039-39228-00267
Significant Source Modification No.: 039-43777-00267
Significant Permit Modification No.: 039-43851-00267
Reviewer: Alexandrea Neuzerling

<table>
<thead>
<tr>
<th>Plant 1</th>
<th>Unit</th>
<th>Unit Capacity (MMBTU/hr)</th>
<th>Identical Units</th>
<th>Total Capacity (MMBTU/hr)</th>
<th>Construction Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Plant 2</td>
<td>Thermocycler</td>
<td>0.58</td>
<td>4</td>
<td>2.32</td>
<td>2000</td>
</tr>
<tr>
<td>Plant 2</td>
<td>Carrier</td>
<td>0.11</td>
<td>2</td>
<td>0.22</td>
<td>2013</td>
</tr>
<tr>
<td>Plant 2</td>
<td>Thermocycler</td>
<td>0.4</td>
<td>2</td>
<td>0.8</td>
<td>1989</td>
</tr>
<tr>
<td>Plant 2</td>
<td>Thermocycler</td>
<td>0.58</td>
<td>1</td>
<td>0.58</td>
<td>2003</td>
</tr>
<tr>
<td>Plant 3</td>
<td>L.E. Air M/UP</td>
<td>2.75</td>
<td>1</td>
<td>2.75</td>
<td>1996</td>
</tr>
<tr>
<td>Plant 3</td>
<td>Thermocycler</td>
<td>0.4</td>
<td>1</td>
<td>0.4</td>
<td>1989</td>
</tr>
<tr>
<td>Plant 3</td>
<td>Carrier</td>
<td>0.1</td>
<td>1</td>
<td>0.1</td>
<td>1998</td>
</tr>
<tr>
<td>Plant 3</td>
<td>Water Heater</td>
<td>0.038</td>
<td>1</td>
<td>0.038</td>
<td>2005</td>
</tr>
<tr>
<td>Plant 4</td>
<td>Solaronics</td>
<td>0.1</td>
<td>11</td>
<td>1.1</td>
<td>2007</td>
</tr>
<tr>
<td>Plant 5</td>
<td>Thermocycler</td>
<td>0.4</td>
<td>1</td>
<td>0.4</td>
<td>1989</td>
</tr>
<tr>
<td>Plant 5</td>
<td>Carrier</td>
<td>0.1</td>
<td>2</td>
<td>0.2</td>
<td>1998</td>
</tr>
<tr>
<td>Plant 5</td>
<td>Water Heater</td>
<td>0.04</td>
<td>1</td>
<td>0.04</td>
<td>2001</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Emission Factor in lb/MMCF</th>
<th>Potential Emission in tons/yr</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM</td>
<td>0.24</td>
<td>0.9</td>
</tr>
<tr>
<td>PM10</td>
<td>0.9</td>
<td>0.9</td>
</tr>
<tr>
<td>SO2</td>
<td>0.1</td>
<td>0.1</td>
</tr>
<tr>
<td>NOx</td>
<td>12.4</td>
<td>12.4</td>
</tr>
<tr>
<td>VOC</td>
<td>7.6</td>
<td>7.6</td>
</tr>
<tr>
<td>CO</td>
<td>84</td>
<td>84</td>
</tr>
</tbody>
</table>

Methodology

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

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32**

HAPs Calculations

**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.
### VOC Emission Calculations

**Material**

<table>
<thead>
<tr>
<th>Material</th>
<th>Density (lb/gal)</th>
<th>Maximum Annual Usage (tons/yr)</th>
<th>VDC Emissions (lbs/yr)</th>
<th>Vinyl Acrylate 108-03-4 (l/b)</th>
<th>Vinyl Acrylate 108-03-3 (l/b)</th>
<th>Glycol Ether (l/b)</th>
<th>Glycol Ether (tons/yr)</th>
<th>Weight % HAP</th>
<th>Weight % Ethyl Benzene 108-88-3 (l/b)</th>
<th>Weight % Naphthalene 91-20-3 (l/b)</th>
<th>Weight % Xylene 108-88-4 (l/b)</th>
<th>Weight % Total (lbs/yr)</th>
</tr>
</thead>
</table>

### HAP emission rate (tons/yr) = Density (lb/gal) * Maximum Annual Usage (lbs/yr) * Weight % HAP * 1 ton/2000 lbs

### VOC emission rate (tons/yr) = Density (lb/gal) * Maximum Annual Usage (lbs/yr) * Weight % VOC * 1 ton/2000 lbs

### METHODOLOGY

- Scale up Factor = 4.2
- VOC emission rate (tons/yr) = Density (lb/gal) * Maximum Annual Usage (lbs/yr) * Weight % VOC * 1 ton/2000 lbs
- HAP emission rate (tons/yr) = Density (lb/gal) * Maximum Annual Usage (lbs/yr) * Weight % HAP * 1 ton/2000 lbs
## Appendix A: Emissions Calculations

**Foam Application Plant 6**

**Company Name:** Highwater Marine LLC, dba Godfrey Marine  
**Address City IN Zip:** 4500 Middlebury Street, Elkhart, IN 46516  
**Operating Permit No.:** T039-39228-00267  
**Significant Source Modification No.:** T039-43777-00267  
**Significant Permit Modification No.:** T039-43851-00267  
**Reviewer:** Alexandrea Neuzerling

### Foam Application PTE - Godfrey Marine, Elkhart, IN

<table>
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<tr>
<th>Type of Coating</th>
<th>Density (Lb/Gal)</th>
<th>Weight % Volatile (H2O &amp; Organics)</th>
<th>Weight % Water/ Volatiles</th>
<th>Weight % Organics</th>
<th>Volume % Water</th>
<th>Volume % Non-Volatiles (solids)</th>
<th>Max Gal of Mat (gal/hr)</th>
<th>VOC (lb/gal LWES)</th>
<th>VOC As Packaged (lb/gallon of coating)</th>
<th>VOC (lb/hr)</th>
<th>VOC (lb/day)</th>
<th>PTE VOC (ton/yr)</th>
<th>Transfer Efficiency</th>
<th>Method of Application</th>
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<tbody>
<tr>
<td>Elastospray 8010a (Pt A)</td>
<td>10.17</td>
<td>0.00%</td>
<td>0.0%</td>
<td>0.0%</td>
<td>0.0%</td>
<td>100.00%</td>
<td>0.100</td>
<td>0.100</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>100%</td>
<td>Pressurized Appl.</td>
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<tr>
<td>Elastospray 40110 W Resin (Pt B)</td>
<td>9.84</td>
<td>30.00%</td>
<td>0.0%</td>
<td>30.0%</td>
<td>0.0%</td>
<td>70.00%</td>
<td>0.100</td>
<td>2.95</td>
<td>2.95</td>
<td>0.30</td>
<td>7.09</td>
<td>1.29</td>
<td>100%</td>
<td>Pressurized Appl.</td>
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<td><strong>Totals</strong></td>
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*The VOC% has been conservatively overestimated due to a lack of available data from the SDS Sheet.*
May 6, 2021

Colin McGann
Highwater Marine, LLC DBA Godfrey Marine
4500 Middlebury Street
Elkhart, IN 46516

Re: Public Notice
Highwater Marine, LLC DBA Godfrey Marine
Permit Level: Title V-Significant Source
Modification (Minor PSD/EO) & Title V-Significant
Permit Modification
Permit Number: 039-43777-00267 & 039-43851-00267

Dear Mr. Colin McGann:

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

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

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

IDEM’s online searchable database: http://www.in.gov/apps/idem/caats/ . Choose Search Option by Permit Number, then enter permit 43777 & 43851

and

IDEM’s Virtual File Cabinet (VFC): https://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/public-notices/

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 Elkhart Public Library – Osolo Branch, 3429 East Bristol Street in Elkhart, IN 46550. 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
May 6, 2021

To: Elkhart Public Library – Osolo Branch

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: Highwater Marine, LLC DBA Godfrey Marine
Permit Number: 039-43777-00267 & 039-43851-00267

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

May 6, 2021
Highwater Marine, LLC DBA Godfrey Marine
039-43777-00267 & 039-43851-00267

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/public-notices/.

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

May 6, 2021

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

Permit Number: 039-43777-00267 & 039-43851-00267
Applicant Name: Highwater Marine, LLC DBA Godfrey Marine
Location: Elkhart, 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.
## Mail Code 61-53

**IDEM Staff**  
KBOURQUE 5/6/2021  
Highwater Marine LLC dba Godfrey Marine 039-43777-00267 & 039-43851-00267  
(draft)  

**Name and address of Sender**  
Indiana Department of Environmental Management  
Office of Air Quality – Permits Branch  
100 N. Senate  
Indianapolis, IN 46204  

**Type of Mail:**  
CERTIFICATE OF MAILING ONLY  

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<td>Doug Adrian Vice President of Operations Highwater Marine LLC dba Godfrey Marine 4500 Middlebury Street Elkhart IN 46516 (RO CAATS)</td>
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<td>Elkhart City Council and Mayors Office 229 South Second Street Elkhart IN 46516 (Local Official)</td>
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