



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

JAN 12 2016

REPLY TO THE ATTENTION OF:

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

Dear Mr. Stuckey:

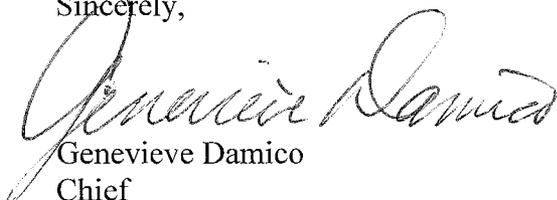
The U.S. Environmental Protection Agency (EPA) has reviewed the draft initial Part 70 operating permit for Splendor Boats, LLC, permit number 085-36296-00038. To ensure that the source meets Federal Clean Air Act requirements, that the permit will provide necessary information so that the basis of the permit decision is transparent and readily accessible to the public, and that the permit record provides adequate support for the decision, EPA has the following comments:

- 1.) 326 IAC 20-48-3 requires the source to comply with the work practice standards listed at both 326 IAC 20-48-3 and 40 C.F.R. §§ 63.5731 and 63.5734(b). Permit condition D.1.2 incorporates the requirements of 326 IAC 20-48-3 but does not specify that the work practice requirements at 40 C.F.R. §§ 63.5731 and 63.5734(b) also apply. We request that you revise permit condition D.1.2 to clarify that the work practice standards required by both 326 IAC 20-48-3 and 40 C.F.R. §§ 63.5731 and 63.5734(b) apply to the source to ensure that the permit condition is consistent with 326 IAC 20-48-3.
- 2.) Permit condition E.2.2(11) incorporates 40 C.F.R. § 63.5735(a) and (c) as an applicable requirement, but we believe that this condition should instead incorporate 40 C.F.R. § 63.5835(a) and (c). Please verify whether 40 C.F.R. § 63.5835 should be included as condition E.2.2(11).
- 3.) Permit condition E.2.2(13) incorporates 40 C.F.R. § 63.5865 as an applicable requirement. However, 40 C.F.R. § 63.5865 applies to continuous lamination/casting operations. Please verify whether the facility contains a continuous lamination/casting operation and whether 40 C.F.R. § 63.5865 is an applicable requirement that should be included in the permit.
- 4.) 40 C.F.R. § 63.5860 is an initial compliance requirement for 40 C.F.R. Part 63, Subpart WWW, and is not included in the draft permit. It is not clear whether 40 C.F.R. § 63.5860 is an applicable requirement that should be included in the initial Part 70

permit. We request that you evaluate whether 40 C.F.R. § 63.5860 is an applicable requirement add it to the permit if necessary.

We appreciate the opportunity to provide comments on this permit. If you have any questions, please feel free to contact Michael Langman, of my staff, at (312) 886-6867.

Sincerely,

A handwritten signature in cursive script, reading "Genevieve Damico". The signature is written in dark ink and is positioned above the typed name.

Genevieve Damico
Chief
Air Permits Section