

PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**EDCOAT Limited Partnership
30350 Edison Road
New Carlisle, IN 46552**

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

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

Operation Permit No.: T141-10725-00102	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: DRAFT Expiration Date:

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SECTION A

SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary roll coil coating manufacturing plant.

Responsible Officials:	Plant Manager
Source Address:	30350 Edison Road, New Carlisle, IN
Mailing Address:	30350 Edison Road, New Carlisle, IN 46552
General Source Phone Number:	(574) 654-9105
SIC Code:	3479
County Location:	St. Joseph
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD Rules Major Source, Section 112 of the Clean Air Act

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

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

- (1) A roll coil prime coating application system, consisting of a roll coater, flow out section, and flash off section, including a natural gas fired bake oven, constructed in June 1996, with a maximum capacity of 60,000 pounds per hour, using the thermal oxidizer as control, and exhausting to stack SV-14. This coating station is capable of coating both sides of the sheet.
- (2) A roll coil finish/top coating application system, consisting of a roll coater, flow out section, and flash off section, including a natural gas fired bake oven, constructed in June 1996, with a maximum capacity of 60,000 pounds per hour, using the thermal oxidizer as control, and exhausting to stack SV-14. This coating station is capable of coating both sides of the sheet.

Notes: Sometimes only one coating is applied, making the prime system the top or finish system.

The following process burners serve the bake ovens in the coating application systems:

- (a) Six model 4988R-2500 natural gas fired process burners, each rated at 2.5 million Btu per hour, constructed in June 1996
- (b) Four model 4988R-4000 natural gas fired process burners, each rated at 4.0 million Btu per hour, constructed in June 1996
- (c) Four model 4988R-6000 natural gas fired process burners, each rated at 6.0 million Btu per hour, constructed in June 1996

Note: The prime and top coating systems operate in sequence to produce an end product. No intermediate products within the activity/process serve as end products.

- (3) A natural gas fired thermal oxidizer that controls emissions from the paint line, coating rooms, ovens, paint storage, and mixing area, rated at 30 million Btu per hour, constructed in June 1996, and exhausting to stack SV-14.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

This stationary source does not currently have any insignificant activities, as defined in 326 IAC 2-7-1 (21) that have applicable requirements.

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

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

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

SECTION B GENERAL 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]

This permit 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.

B.3 Enforceability [326 IAC 2-7-7]

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.4 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.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 Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)] [326 IAC 2-7-6(6)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

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

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) 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. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.

(c) 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 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; or
 - (3) Denial of a permit renewal application.
- (b) Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act.
- (c) 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.
- (d) 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.

B.9 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

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

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

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

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

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 the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]
[326 IAC 1-6-3]

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

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

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality

100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The PMP extension notification does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).
- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

B.12 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, 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 Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)

Facsimile Number: 317-233-5967

- (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 Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

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 the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (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) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(9) 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.
 - (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.13 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 in

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)(7)]

B.14 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either
- (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted
- by this permit.
- (b) All previous registrations and permits are superseded by this permit.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

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

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. 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.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

**B.16 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 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 the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (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.17 Permit Renewal [326 IAC 2-7-4]

- (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(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

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

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
 - (1) A timely renewal application is one that is:
 - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (B) 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.
 - (2) If IDEM, OAQ, upon receiving a timely and complete 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.
- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the

deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.

- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAQ, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.18 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
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

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

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

B.19 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 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.20 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), (c), or (e), 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 emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms

of total emissions);

- (4) The Permittee notifies the:

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

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes 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), (c)(1), and (e)(2).

- (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(36)) 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 the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in 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.

B.21 Source Modification Requirement [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-7-10.5.

B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2] [IC 13-17-3-2] [IC 13-30-3-1]

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.23 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
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

B.24 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, I/M & Billing Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

- C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [40 CFR 52, Subpart P] [326 IAC 6-3-2]
- (a) Pursuant to 40 CFR 52 Subpart P, the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- (b) Pursuant to 326 IAC 6-3-2(e)(2), the allowable particulate emissions rate 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. This condition is not federally enforceable.
- C.2 Opacity [326 IAC 5-1]
- Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]
- The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.
- C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]
- The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.
- 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 Operation of Equipment [326 IAC 2-7-6(6)]
- Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

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

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

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

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 by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (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) **Indiana Accredited 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 Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited, pursuant to the provisions of 40 CFR 61, Subpart M, is federally enforceable.

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

C.9 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

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

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

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

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

Compliance Requirements [326 IAC 2-1.1-11]

C.10 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may issue an order under 326 IAC 2-1.1-11 to require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. 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.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, 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 Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

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 the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

C.13 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

- (a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.
- (b) Whenever a condition in this permit requires the measurement of a temperature the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.
- (c) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

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

C.14 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 prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on September 13, 1999.
- (b) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (c) 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.15 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

- (a) A compliance schedule for meeting the requirements of 40 CFR 68; or
- (b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP).

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.16 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]

-
- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:
 - (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected time frame for taking reasonable response steps.
 - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
 - (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
 - (1) Reasonable response steps shall be taken as set forth in the Permittee's current

Compliance Response Plan; or

- (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
 - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.
 - (4) Failure to take reasonable response steps shall constitute a violation of the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
- (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.
 - (3) An automatic measurement was taken when the process was not operating.
 - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.17 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 take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

C.18 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]

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
 - (1) Indicate estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
 - (2) Indicate estimated actual emissions of other regulated pollutants (as defined by 326 IAC 2-7-1) from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The annual emission statement 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.19 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

- (a) Records of all required data, reports and support information shall be retained for a

period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.20 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (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) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.21 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 the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

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

- (a) A roll coil prime coating application system, consisting of a roll coater, flow out section, and flash off section, including a natural gas fired bake oven, constructed in June 1996, with a maximum capacity of 60,000 pounds per hour, using the thermal oxidizer as control, and exhausting to stack SV-14. This coating station is capable of coating both sides of the sheet.
- (b) A roll coil finish/top coating application system, consisting of a roll coater, flow out section, and flash off section, including a natural gas fired bake oven, constructed in June 1996, with a maximum capacity of 60,000 pounds per hour, using the thermal oxidizer as control, and exhausting to stack SV-14. This coating station is capable of coating both sides of the sheet.

Notes: Sometimes only one coating is applied, making the prime system the top or finish system.

The following process burners serve the bake ovens in the coating application systems:

- (1) Six model 4988R-2500 natural gas fired process burners, each rated at 2.5 million Btu per hour, constructed in June 1996
- (2) Four model 4988R-4000 natural gas fired process burners, each rated at 4.0 million Btu per hour, constructed in June 1996
- (3) Four model 4988R-6000 natural gas fired process burners, each rated at 6.0 million Btu per hour, constructed in June 1996

Note: The prime and top coating systems operate in sequence to produce an end product. No intermediate products within the activity/process serve as end products.

- (c) A natural gas fired thermal oxidizer that controls emissions from the paint line, coating rooms, ovens, paint storage, and mixing area, rated at 30 million Btu per hour, constructed in June 1996, and exhausting to stack SV-14

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

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

D.1.1 General Provisions Relating to NSPS [326 IAC 12-1][40 CFR Part 60, Subpart A]

The provisions of 40 CFR Part 60, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 12-1, apply to the coil coating lines described in this section except when otherwise specified in 40 CFR Part 60, Subpart TT.

D.1.2 General Provisions Relating to NESHAP [326 IAC 20-1][40 CFR Part 63, Subpart A]

On and after June 14, 2002, the provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 20-1, apply to the coil coating lines described in this section except when otherwise specified in 40 CFR Part 63, Subpart SSSS.

D.1.3 New Source Performance Standards (NSPS) Subpart TT - Metal Coil Surface Coating [326 IAC 12 and 40 CFR 60.462]

Pursuant to 326 IAC 12 and 40 CFR 60.462(a)(4), the metal coil coating process shall not discharge into the air in excess of a value between 0.14 (or a 90% VOC emission reduction) and

0.28 kg VOC/l of coating solids applied for each calendar month. The definition of “month” as defined in 40 CFR 63.5110 shall apply to this limit as long as the Permittee predefines “month” in such a way that there is at least one 5-week month in each calendar quarter.

D.1.4 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

- (a) The roll coil coating application systems shall not emit greater than 247 tons of VOC per 12 consecutive month period with compliance demonstrated at the end of each month. This usage limit, along with the potential to emit 2.1 tons of VOC per year from the combustion units, is required to limit the source’s potential to emit VOC to less than 250 tons per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.
- (b) The definition of “month” at 40 CFR 63.5110 shall apply to the limits in this condition as long as the Permittee predefines “month” in such a way that there is at least one 5-week month in each calendar quarter.

D.1.5 NESHAP - Surface Coating of Metal Coil – Emission Limits [40 CFR 63 Subpart SSSS]

On and after June 10, 2005, each coil coating line must limit organic HAP emissions to the level specified in paragraph (a), (b), or (c):

- (a) No more than 2 percent of the organic HAP applied for each month during each 12-month compliance period (98 percent reduction); or
- (b) No more than 0.046 kilogram (kg) of organic HAP per liter of solids applied during each 12-month compliance period; or
- (c) If an oxidizer is used to control organic HAP emissions, the oxidizer must be operated such that an outlet organic HAP concentration of no greater than 20 parts per million by volume (ppmv) on a dry basis is achieved and the efficiency of the capture system is 100 percent.

The Permittee must demonstrate compliance with one of these standards by following the applicable procedures in 40 CFR 63.5170.

D.1.6 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

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

Pursuant to 326 IAC 8-2-4 (Coil Coating Operations), and CP 141-4731-00102 issued March 7, 1996, the owner or operator of the coil coating operation may not cause, allow or permit the discharge into the atmosphere any VOC in excess of 2.6 pounds per gallon, excluding water, delivered to the applicator. This limit is equivalent to 4.02 pounds of VOC per gallon of coating solids.

Compliance Determination Requirements

D.1.8 NESHAP - Surface Coating of Metal Coil – Monitoring [40 CFR 63 Subpart SSSS]

On and after June 10, 2005, each coil coating line must comply with the following requirements:

- (a) For the purposes of demonstrating compliance with the emission limits in D.1.5 and 40 CFR 63.5120, the current overall reduction efficiency may be used in calculations to

demonstrate compliance only when total permanent enclosure of the coating room is maintained and the thermal oxidizer operating temperature is maintained at or above the combustion temperature limit established according to 40 CFR 63.5160(d)(3)(i).

- (b) For the purposes of demonstrating compliance with the emission limits in D.1.5 and 40 CFR 63.5120, no credit will be given for control of VOC unless the following requirements are met:
- (1) Each capture system and control device used to demonstrate compliance with the emission limits established in 40 CFR 63.5120 and Condition D.1.5 shall be monitored and inspected following the date on which the initial performance test of the capture and control system is completed. The following monitoring equipment must be installed and operated.
 - (A) Install, calibrate, maintain, and operate temperature monitoring equipment according to manufacturer's specifications. The calibration of the chart recorder, data logger, or temperature indicator must be verified every 3 months; or the chart recorder, data logger, or temperature indicator must be replaced. The equipment must be replaced either if the calibration is not performed or the equipment cannot be calibrated properly. Each temperature monitoring device must be equipped with a continuous recorder. For the purposes of measuring temperature of the thermal oxidizer, continuous shall mean no less often than once per minute. The device must have an accuracy of plus or minus 1 percent of the temperature being monitored in degrees Celsius, or plus or minus 1 degree Celsius, whichever is greater.
 - (B) For the thermal oxidizers, to demonstrate compliance with the operating limit established according to 40 CFR 63.5160(d)(3)(i), a thermocouple or temperature sensor shall be installed in the combustion chamber at a location in the combustion zone.
 - (C) If a control device is used to comply with the standards in 40 CFR 63.5120, the Permittee shall develop a capture system monitoring plan containing the information specified below. The monitoring plan must be made available for inspection by IDEM, OAQ upon request.
 - (I) The monitoring plan must identify the operating parameter to be monitored to ensure that the capture efficiency measure during the initial compliance test is maintained, explain why this parameter is appropriate for demonstrating ongoing compliance, and identify the specific monitoring procedures.
 - (II) The plan must also specify operating limits at the capture system operating parameter value, or range of values, that demonstrates compliance with the standards in 40 CFR 63.5120. The operating limits must represent the conditions indicative of proper operation and maintenance of the capture system.
 - (III) The Permittee must conduct monitoring in accordance with the

plan.

- (2) Any deviation from the required operating parameters in 40 CFR 63.5150(a)(3) and (4) will be considered a deviation from the operating limit, unless otherwise excused.

D.1.9 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11][40 CFR 60.463]
[40 CFR 63 Subpart SSSS]

- (a) Within 30 months after issuance of this Part 70 permit, the Permittee shall perform compliance tests for VOC emissions, destruction efficiency, and overall reduction efficiency, according to 326 IAC 3-6 (Source Sampling Procedures), using the methods specified in the rule or as approved by the Commissioner. The tests shall determine an appropriate duct flow rate, differential pressure, or other parameter which is indicative of VOC capture efficiency. These tests shall be repeated at least once every 30 months following the date of each valid compliance demonstration to show compliance with the VOC limits specified in Conditions D.1.4 and D.1.7. The Permittee shall also demonstrate compliance with the following criteria for permanent total enclosure of the coating rooms:
 - (1) Any Natural Draft Opening (NDO) shall be at least four equivalent opening diameters from each VOC emitting point. NDO is any permanent opening in the enclosure which remains open during the operation of the facility and is not connected to a duct in which a fan is installed.
 - (2) The total area of all NDO's shall not exceed five percent of the surface area of the enclosure's four walls, floor, and ceiling.
 - (3) The average facial velocity (FV) of air through all NDO's shall be at least 3,600 m/hr (200 fpm). The direction of air through all NDO's shall be into the enclosure.
 - (4) All access doors and windows whose areas are not included in condition (2) and are not included in the calculation of condition (3) shall be closed during routine operation of the process.
 - (5) All VOC emissions must be captured and contained for discharge through a control device.
- (b) Pursuant to 40 CFR 63, Subpart SSSS, the Permittee shall perform the testing to determine the control device destruction or removal efficiency as specified in 40 CFR 63.5160(d). Pursuant to 40 CFR 63, Subpart SSSS, the Permittee shall determine the organic HAP content of each coating and the solids content of each coating as specified in 40 CFR 63.5160 (b), and (c).

D.1.10 NESHAP - Surface Coating of Metal Coil – Demonstrating Compliance [40 CFR 63 Subpart SSSS]

On and after June 10, 2005, compliance with the provisions of 40 CFR 63.5120 and Condition D.1.5 of this permit shall be demonstrated as specified in 40 CFR 63.5170.

D.1.11 Compliance Determination for NSPS [326 IAC 12-1] [40 CFR 60, Subpart TT]

The source shall perform a monthly compliance test in accordance with 40 CFR 60.463.

D.1.12 Compliance Determination for PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

Compliance with the limit in Condition D.1.4 shall be demonstrated by totaling the following on a monthly basis:

- (1) the total mass of VOC used without a control device (40 CFR 60.463, Equation 13);
- (2) the total mass of VOC used with the control device (40 CFR 60.463, Equation 15) multiplied by one minus the overall reduction efficiency as determined by the most recent IDEM-approved stack test; and
- (3) the total mass of clean-up solvents used during the month.

D.1.13 Compliance Determination for Volatile Organic Compounds (VOC) [326 IAC 8-2-4]

- (a) When not using the thermal oxidizer, the VOC content and usages used to demonstrate compliance with the limits contained in Condition D.1.7 shall be determined by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets, and following procedures for determining monthly volume-weighted average emissions as described in 40 CFR 60.463(c)(4) and daily-weighted average emissions described in 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a). 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) Operating the thermal oxidizer at an average hourly temperature of 1312 °F or higher for an entire day to demonstrate a reduction efficiency of 94.5% while maintaining 100% capture, will demonstrate compliance with the requirements of 326 IAC 8-2-4 and Condition D.1.7 for that day.

For days when the thermal oxidizer is used intermittently during the day, or not used at all during the day, the achievement of the limit shall be based on the following equation:

$$A = [3 (C * U) / 3 U]_{NT} + [(100\% - R) [3 (C * U) / 3 U]_T] \# 2.6 \text{ lb VOC/gal}$$

A = Daily volume weighted average in pounds VOC per gallon

C = VOC content of coating in pounds VOC per gallon

U = usage rate of coating in gallons per day

R = 94.5 %, or the latest tested reduction efficiency

NT refers to applications during which the oxidizer is not operated at or above an average hourly temperature of 1312°F, or the latest tested temperature

T refers to applications during which the oxidizer is operated at or above an average hourly temperature of 1312°F, or the latest tested temperature

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

D.1.14 Monitoring

- (a) If the thermal oxidizer is used intermittently or continuously to demonstrate compliance with Conditions D1.4 and D.1.7, the following conditions shall apply:
 - (1) The thermal oxidizer chamber temperature shall be continuously monitored and recorded to demonstrate compliance with 326 IAC 2-2, 326 IAC 8-2-4, and Conditions D.1.4 and D.1.7. For the purpose of measuring the temperature of the thermal oxidizer, continuous shall mean no less often than once per minute. The temperature measurements shall be reduced to 1-hour block averages. The

Permittee shall take appropriate response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports whenever the hourly average temperature of the thermal oxidizer is below 1312 °F. An hourly average temperature that is below 1312 °F is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

- (2) The thermal oxidizer shall have an accuracy of +/- 1°C or +/- 0.75 percent of the temperature being measured expressed in degrees Celsius, whichever is greater.
- (3) The capture system (i.e. the coating rooms) for the metal coil coating operation shall achieve total permanent enclosure.
- (4) Differential pressure in the coating room, or another parameter which is indicative of capture efficiency, shall be maintained within a range established in the most recent compliance test to achieve the tested emission reduction. Differential pressure in the coating room, or another parameter indicative of capture efficiency, shall be measured at least once per day after the appropriate differential pressure (or other parameter) has been established through an approved compliance test.

The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports, shall be considered a violation of this permit.

- (b) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

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

D.1.15 NESHAP - Surface Coating of Metal Coil – Record Keeping Requirements [40 CFR 63 Subpart SSSS]

Pursuant to 40 CFR 63.5190, on and after June 10, 2005, the Permittee shall maintain the records as specified below.

- (a) Pursuant to 40 CFR 63.5190, the Permittee shall maintain the records of the coating lines on which the Permittee used each compliance option and the time periods (beginning and ending dates and times) the Permittee used each option.
- (b) Pursuant to 40 CFR 63.5190, the Permittee shall maintain the records specified in 40 CFR 63.10(b)(2) of all measurements needed to demonstrate compliance with 40 CFR 63, Subpart SSSS, including:
 - (1) control device and capture system operating parameter data in accordance with 40 CFR 63.5150(a)(3) and (4);
 - (2) organic HAP content data for the purpose of demonstrating compliance in accordance with 40 CFR 63.5160(b);

- (3) volatile matter and solids content data for the purpose of demonstrating compliance in accordance with 40 CFR 63.5160(c);
- (4) overall control efficiency determination or alternative outlet HAP concentration using capture efficiency tests and control device destruction or removal efficiency tests in accordance with 40 CFR 63.5160(d) and (e); and
- (5) material usage, HAP usage, volatile matter usage, and solids usage and compliance demonstrations using these data in accordance with 40 CFR 63.5170(a), (b), and (d).

D.1.16 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.3, D.1.4, and D.1.7, and pursuant to 326 IAC 2-7-5(9), the Permittee shall maintain the following records:
 - (1) The total VOC usage for each quarter, including coatings, dilution solvents, and clean-up solvents;
 - (2) A log of all times when the thermal oxidizer is in operation and the corresponding temperature data;
 - (3) A log of the date and time that each application/batch begins and ends, and the beginning and ending times of any interruptions during a batch;
 - (4) The VOC content of each coating material and dilution solvent used in each application/batch run.
 - (5) The amount of coating material and dilution solvent less water used on a daily basis, as needed to demonstrate compliance with D.1.13. Records shall be kept of cleanup solvent usage on a monthly basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (6) Records which shall be taken daily or monthly, as specified below, and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.1.3, D.1.4 and D.1.7.
 - (A) For each calendar month, the volume-weighted average mass of VOC emitted to the atmosphere (N) and the calculated emission limit (S), as described in 40 CFR 60.463(c)(4);
 - (B) For days when the thermal oxidizer is used intermittently or not used at all, records shall be kept of the daily volume weighted average VOC content of each coating and solvent used, in pounds of VOC per gallon of coating, excluding water or pounds of VOC per gallon of coating solids.

- (C) The weight of VOCs emitted for each month.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.17 NESHAP - Surface Coating of Metal Coil – Reporting Requirements [40 CFR 63 Subpart SSSS]
Pursuant to 40 CFR 63.5180, the Permittee shall submit reports as specified below.

- (a) The Permittee must submit a Notification of Performance Test as specified in 40 CFR 63.7 and 63.9(e) if the Permittee is complying with the emission standard using a control device. This notification and the site-specific test plan required under 40 CFR 63.7(c)(2) must identify the operating parameter to be monitored to ensure that the capture efficiency measured during the performance test is maintained. The Permittee may consider the operating parameter identified in the site-specific test plan to be approved unless explicitly disapproved, or unless comments received from the Administrator require monitoring of an alternate parameter.
- (b) The Permittee must submit a Notification of Compliance Status as specified in 40 CFR 63.9(h). The Permittee must submit the Notification of Compliance Status no later than 30 calendar days following the end of the initial 12-month compliance period described in 40 CFR 63.5130.
- (c) The Permittee must submit performance test reports as specified in 40 CFR 63.10(d)(2) if the Permittee is using a control device to comply with the emission standards and has not obtained a waiver from the performance test requirement.
- (d) The Permittee must submit start-up, shutdown, and malfunction reports as specified in 40 CFR 63.10(d)(5) if the Permittee use a control device to comply with this subpart.
 - (1) If the Permittee's actions during a start-up, shutdown, or malfunction of an affected source (including actions taken to correct a malfunction) are not completely consistent with the procedures specified in the source's start-up, shutdown, and malfunction plan specified in 40 CFR 63.6(e)(3), the Permittee must state such information in the report. The start-up, shutdown, or malfunction report will consist of a letter containing the name, title, and signature of the responsible official who is certifying its accuracy, that will be submitted to the Administrator.
 - (2) Separate start-up, shutdown, or malfunction reports are not required if the information is included in the report specified in 40 CFR 63.5180 (g).
- (e) The Permittee must submit semi-annual compliance reports containing the information specified in 40 CFR 63.5180 (g)(1) and (2).
 - (1) Compliance report dates.
 - (i) The first semiannual compliance reporting period begins 1 day after the end of the initial compliance period described in 40 CFR 63.5130(d) that applies to the affected source and ends 6 months later.
 - (ii) The first compliance report must be postmarked or delivered no later than thirty (30) days after the reporting period ends.

- (iii) Each subsequent compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31.
 - (iv) Each subsequent compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period.
 - (v) For each affected source that is subject to permitting regulations pursuant to 40 CFR part 70 or part 71, and the permitting authority has established dates for submitting semiannual reports pursuant to 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), the Permittee may submit the first and subsequent compliance reports according to the dates the permitting authority has established instead of according to the dates in 40 CFR 63.5180 (g)(1)(i) through (iv).
- (2) The semi-annual compliance report must contain the following information:
- (i) Company name and address.
 - (ii) Statement by a responsible official with that official's name, title, and signature, certifying the accuracy of the content of the report.
 - (iii) Date of report and beginning and ending dates of the reporting period. The reporting period is the 6-month period ending on June 30 or December 31. Note that the information reported for each of the 6 months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation.
 - (iv) Identification of the compliance option or options specified in Table 1 to 40 CFR 63.5170 that the Permittee used on each coating operation during the reporting period. If the Permittee switched between compliance options during the reporting period, the Permittee must report the beginning dates the Permittee used each option.
 - (v) A statement that there were no deviations from the standards during the reporting period, and that no CEMS were inoperative, inactive, malfunctioning, out-of-control, repaired, or adjusted.
- (f) The Permittee must submit, for each deviation occurring at an affected source where the Permittee is not using CEMS to comply with the standards in this subpart, the semi-annual compliance report containing the information in 40 CFR 63.5180 (f)(2)(i) through (iv) and the information in 40 CFR 63.5180 (g)(1) through (3) including the following:
- (1) The total operating time of each affected source during the reporting period.
 - (2) Information on the number, duration, and cause of deviations (including unknown cause, if applicable) as applicable, and the corrective action taken.
 - (3) Information on the number, duration, and cause for monitor downtime incidents

(including unknown cause other than downtime associated with zero and span and other daily calibration checks, if applicable).

D.1.18 Reporting Requirements

A summary of the following information shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the period being reported:

- (a) Information to document compliance with Condition D.1.4 shall be submitted quarterly.
- (b) Pursuant to 40 CFR 60.465(c), the owner or operator shall submit a calendar quarter written report of each instance in which the monthly volume-weighted average of the local mass of VOC emitted to the atmosphere (N) is greater than the emission limit (S), as calculated pursuant 40 CFR 60.463(c)(4). If no such instances have occurred during a particular quarter, a report stating this shall be submitted semiannually.

The reports submitted by the Permittee require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: EDCOAT Ltd. Partnership
Source Address: 30350 Edison Road, New Carlisle, Indiana 46552
Mailing Address: 30350 Edison Road, New Carlisle, Indiana 46552
Part 70 Permit No.: T141-10725-00102

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:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Affidavit (specify) _____
- 9 Other (specify) _____

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

Signature:

Printed Name:

Title/Position:

Phone:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: EDCOAT Ltd. Partnership
Source Address: 30350 Edison Road, New Carlisle, Indiana 46552
Mailing Address: 30350 Edison Road, New Carlisle, Indiana 46552
Part 70 Permit No.: T141-10725-00102

This form consists of 2 pages

Page 1 of 2

- | |
|--|
| <p>9 This is an emergency as defined in 326 IAC 2-7-1(12)</p> <ul style="list-style-type: none">c The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); andc The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-5967), 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:

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

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

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

Part 70 Quarterly Report

Source Name: EDCOAT Ltd. Partnership
Source Address: 30350 Edison Road, New Carlisle, Indiana 46552
Mailing Address: 30350 Edison Road, New Carlisle, Indiana 46552
Part 70 Permit No.: T141-10725-00102
Facility: roll coil prime and top coating application system
Parameter: (100% - R) of all input VOC during times when the thermal oxidizer is operated at tested temperature to achieve R and compliance with limits to render PSD not applicable
Limit: 247 tons of VOC per 12 consecutive month period

Thermal oxidizer reduction efficiency R = 94.5%, or latest tested reduction efficiency R = _____

Required temperature for thermal oxidizer operation = 1312°F, or latest tested temperature = _____, for every three hour average period during each application/batch run and cleanup.

Month: _____ YEAR: _____

Day	Input VOC from coatings and dilution solvents	Oxidizer in operation? (yes / no)	VOC from coatings and dilution solvents	VOC from clean-up solvents (lb)	Total VOC emissions (lb)
1					
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					
13					
14					
15					
16					
17					
18					
19					
20					
21					
22					
23					
24					
25					
26					
27					
28					
29					
30					
31					

9 No deviation occurred in this quarter.

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

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

Attach a signed certification to complete this report.

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

**PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: EDCOAT Ltd. Partnership
Source Address: 30350 Edison Road, New Carlisle, Indiana 46552
Mailing Address: 30350 Edison Road, New Carlisle, Indiana 46552
Part 70 Permit No.: T141-10725-00102

Months: _____ to _____ Year: _____

Page 1 of 2

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do 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".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)

Date of Deviation: **Duration of Deviation:**

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)

Date of Deviation: **Duration of Deviation:**

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

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

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Quality

Addendum to the Technical Support Document for a Part 70 Operating Permit

Source Name: EDCOAT Limited Partnership
Source Location: 30350 Edison Road New Carlisle, IN 46552
County: St. Joseph
SIC Code: 3479
Operation Permit No.: T 141-10725-00102
Permit Reviewer: Nisha Sizemore

On January 13, 2003, the Office of Air Quality (OAQ) had a notice published in the South Bend Tribune, South Bend, Indiana, stating that EDCOAT Limited Partnership had applied for a Part 70 Operating Permit to operate a roll coil coating plant. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On January 13, 2002, Barbara Scott submitted comments on the proposed permit. Ms. Scott's comments and IDEM's responses are shown below.

Comment

Why bother protesting! Your department heard some very serious and accurate comments on how this company would be endangering our environment when they first moved to New Carlisle. We had scientists, medical doctors, farmers, mothers of children with breathing problems, etc. Evidently payola was involved!

Response

This permit is a Part 70 permit. It does not allow Edcoat to construct any new emission units or increase emissions of any regulated pollutants. The Part 70 permit consolidates all of Edcoat's applicable air pollution control requirements into one permit. This Part 70 permit also includes compliance monitoring and stack testing requirements to assure that the source remains in continuous compliance with all applicable rules and permit conditions.

A new NESHAP rule which limits emissions of hazardous air pollutants has been finalized by EPA. Edcoat is subject to this rule and must comply with it by June 10, 2005. This Part 70 permit includes the applicable requirements of the NESHAP and explains what Edcoat must do to comply with that new rule.

On February 12, 2003 James M. Hanlon, Sr., P.E., on behalf of Edcoat Limited Partnership, submitted comments on the proposed permit. A summary of the comments and IDEM's responses follow, with changes to the permit shown in bold (for new text) and stricken text (for deleted text).

Comment #1

Section A.1

Remove Raymond Drufke as a Responsible Official, add Jeff Williams.

The area code is now 574.

Through e-mail exchange, Mr. Hanlon later stated that it would be acceptable to list the plant manager as the responsible official.

Response #1

Changes to Section A.1 are shown below.

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

The Permittee owns and operates a stationary roll coil coating manufacturing plant.

Responsible Officials:	James Severud, Raymond Drufke, Lex Sadler Plant Manager
Source Address:	30350 Edison Road, New Carlisle, IN
Mailing Address:	30350 Edison Road, New Carlisle, IN 46552
General Source Phone Number:	(219) (574) 654-9105
SIC Code:	3479
County Location:	St. Joseph
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD Rules Major Source, Section 112 of the Clean Air Act

Comment #2

Section A.2

Subsection labeled (a) should be (1).

In the description of the coating lines, we want to make the following facts clear:

- 1) Sometimes only one coating is applied, making the prime system the top or finish system.
- 2) Both coating stations are capable of coating both sides of the sheet.
- 3) Some regulations use top coat, some use finish coat, perhaps both should be used for clarity. (This applies throughout the permit.)

Response #2

Changes to Section A.2 are shown below. These same changes have also been made in the descriptions located in Section D.1 of the permit.

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

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

- ~~(a)~~**(1)** A roll coil prime coating application system, consisting of a roll coater, flow out section, and flash off section, including a natural gas fired bake oven, constructed in June 1996, with a maximum capacity of 60,000 pounds per hour, using the thermal oxidizer as control, and exhausting to stack SV-14. **This coating station is capable of coating both sides of the sheet.**
- (2) A roll coil **finish**/top coating application system, consisting of a roll coater, flow out section, and flash off section, including a natural gas fired bake oven, constructed in June

1996, with a maximum capacity of 60,000 pounds per hour, using the thermal oxidizer as control, and exhausting to stack SV-14. **This coating station is capable of coating both sides of the sheet.**

Notes: Sometimes only one coating is applied, making the prime system the top or finish system.

The following process burners serve the bake ovens in the coating application systems:

- (a) Six model 4988R-2500 natural gas fired process burners, each rated at 2.5 million Btu per hour, constructed in June 1996
- (b) Four model 4988R-4000 natural gas fired process burners, each rated at 4.0 million Btu per hour, constructed in June 1996
- (c) Four model 4988R-6000 natural gas fired process burners, each rated at 6.0 million Btu per hour, constructed in June 1996

Note: The prime and top coating systems operate in sequence to produce an end product. No intermediate products within the activity/process serve as end products.

- (3) A natural gas fired thermal oxidizer that controls emissions from the paint line, coating rooms, ovens, paint storage, and mixing area, rated at 30 million Btu per hour, constructed in June 1996, and exhausting to stack SV-14.

Comment #3

Section B.8

40 C.F.R. § 70.6(a)(6)(i) requires that each permit must contain a provision stating, *inter alia*: "The Permittee must comply with all conditions of the part 70 permit. Any permit noncompliance constitutes a violation of the Act and is grounds for enforcement action . . ." This language constitutes fair notice to the Permittee that any noncompliance with any permit condition could be the subject of enforcement. There is nothing in Part 70, or its history, which indicates that this language was to be an independently enforceable clause subject to a separate penalty for violation thereof, transforming any deviation from any permit condition into multiple violations. Yet IDEM has recently issued a revised version (September 6, 2002) of its NPD entitled "Guidelines for Submittal and Review of Annual Compliance Certificates under the Federally Enforceable State Operating Permit (FESOP) and Part 70 Permit Programs." Under the heading "Sections B, C and D" at page 4, IDEM states that "a deviation from an emission limit or record keeping requirement in Section D would require that a deviation would also have to [sic] identified for permit condition B.8, Compliance with Permit Conditions." The example certification confirms this position. The guidance therefore incorrectly identifies the "general duty" language of B.8 as an independently enforceable condition, which it is not and never was intended to be. There is no reason for IDEM to put citizens at risk for multiple penalties for a violation of only one substantive permit condition. Condition B.8 must be amended by adding subparagraph (e) to read: "Noncompliance with any other provision of this permit shall not give rise to an independent enforcement action for noncompliance with subparagraph (a) above."

Response #3

326 IAC 2-7-5(6)(A) requires that the permit contain a provision stating the Permittee must comply with all conditions of the Part 70 permit. Any Part 70 permit noncompliance constitutes a violation of the CAA

and is grounds for enforcement and other actions. No change was made as a result of this comment. IDEM agrees that it would be appropriate to use discretion to excuse noncompliance with Condition B.8; however, it is not necessary to state criteria regarding the exercise of that discretion in the permit.

Comment #4

Section B.22(d)

326 I.A.C. 2-7-6(2)(D), on which this permit condition is based, contains the clause "As authorized by the CAA". IDEM cannot amend a duly promulgated regulation by means of a permit condition. In the absence of a rule change, the clause must be included.

Response #4

Condition B.22(d) is based on the Indiana Statute IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, as well as 326 IAC 2-7-6(2). The statute grants IDEM the authority to inspect and investigate for possible violations of any air pollution control laws. Since some of Indiana's air pollution control laws are more stringent than the federal laws authorized by the Clean Air Act, the Indiana Statutes grant IDEM broader authority than 326 IAC 2-7-6(2). The condition has been revised to cite all of the statutes that grant IDEM the authority for the condition.

B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2] [IC 13-17-3-2] [IC 13-30-3-1]

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.

Comment #5

Section C.16(b)

This subsection requires that if additional response steps necessitate shutdown of the emissions unit or

the control device, IDEM must be promptly notified. While this requirement makes sense when a control device is to be shut down, it makes no sense when the emissions unit is shut down. Because all emissions will cease, why does IDEM need to know? If an emergency occurred, notice would have been provided under B.12; if a deviation occurred, it would be reported under C.20.

Response #5

The intent of this condition is to require the Permittee to notify IDEM in cases where the Permittee determines that an emission unit must be shutdown to respond appropriately to a deviation or abnormal emissions, but the shutdown cannot occur immediately. In such situations, IDEM is likely to receive complaints about the excess emissions and would need to be able to inform the public as to the expected date of the shutdown of the emission unit.

Comment #6

Compliance with 326 IAC 2-2 is based on a total of 250 tons of VOC emissions per year. This should be stated as such instead of automatically subtracting the combustion emissions at PTE levels. The permit should state the combustion emissions do not need to be calculated unless the total of all other VOC emissions exceed 247 tons. Edcoat suggests the following language for the condition limiting VOC emissions to less than PSD applicability thresholds:

D.1.4 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

The source shall not emit more than 250 tons of VOC per year, calculated on a twelve-month rolling average.

Response #6

EPA, in their 1989 "Limiting Potential to Emit in New Source Permitting" memo¹ stated that limits established for the purpose of rendering PSD not applicable must be enforceable as a practical matter. These same procedures for limiting PTE are reiterated in EPA's New Source Review Workshop Manual² (NSR Manual). Edcoat has chosen to accept a 249 ton per year limit on VOC emissions in order to render PSD not applicable. EPA guidance states that the Permittee must choose how much of the limit is to be allotted to the combustion units versus the roll coil coating operation. It would not be appropriate to allow Edcoat to emit more than 247 tons per year from just the surface coating operation, then at that point calculate the combustion emissions to find out if Edcoat exceeded the PSD major source threshold of 250 tons per year. The permit must limit the potential to emit of the source to less than 250 tons per year. Therefore, if Edcoat wishes to use less than the potential emissions for the combustion units, the permit must include an enforceable condition that limits the PTE of the combustion units to less than the potential emissions. Edcoat has not agreed to accept any such limit; therefore, the PTE of the roll coil coating operation must be limited to 249 minus the potential emissions of the combustion units.

IDEM does agree to simplify the condition by including only the emission limit in this condition. The methods to be used for determining compliance have been moved to Condition D.1.12. Revisions to Section D.1 of the permit are shown at the end of this addendum.

¹ See EPA Air Enforcement Division, Office of Enforcement and Compliance Monitoring memorandum "Limiting Potential to Emit in New Source Permitting," June 13, 1989.

² See EPA's New Source Review Workshop Manual, October 1990, page A.5.

Comment #7

Section D.1.5 does not quote the regulation exactly. Consequently, it can be read that option (c) must be chosen if an oxidizer is used. Correct the wording to reflect that any option can be used. Edcoat suggests the following language:

D.1.5 NESHAP - Surface Coating of Metal Coil – Emission Limits [40 CFR 63 Subpart SSSS]

On and after June 10, 2005, each coil coating line must limit organic HAP emissions to the following level specified in paragraph (a), (b), or (c):

- (a) No more than 2 percent of the organic HAP applied for each month during each 12-month compliance period (98 percent reduction); or
- (b) No more than 0.046 kilogram (kg) of organic HAP per liter of solids applied during each 12-month compliance period; or
- (c) If an oxidizer is used to control organic HAP emissions, the oxidizer must be operated such that an outlet organic HAP concentration of no greater than 20 parts per million by volume (ppmv) on a dry basis is achieved and the efficiency of the capture system is 100 percent.

Response #7

IDEM agrees. The requested change has been made as shown in the above comment. Also, all changes to Section D.1 of the permit are shown at the end of this addendum.

Comment #8

Condition D.1.7

The NSPS and NESHAP limits are both based on VOC content per gallon of coating solids. Edcoat requests that the limit in 326 IAC 2-8-4 be converted to the same basis. As was discussed previously, we are in agreement with IDEM's calculation of the equivalent limit as 4.02 pounds of VOC per gallon of coating solids. Edcoat suggests the following language for Condition D.1.7:

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

Pursuant to 326 IAC 8-2-4 (Coil Coating Operations), and CP 141-4731-00102 issued March 7, 1996, the owner or operator of the coil coating operation may not cause, allow or permit the discharge into the atmosphere any VOC in excess of 2.6 pounds per gallon, excluding water, delivered to the applicator. **This limit is equivalent to 4.02 pounds of VOC per gallon of coating solids.**

Response #8

IDEM agrees. The requested change has been made as shown in the above comment. Also, all changes to Section D.1 of the permit are shown at the end of this addendum.

Comment #9

Condition D.1.8

In *Appalachian Power Co. v. EPA*, 208 F.3d 1015 (D.C. Cir. 2000), the court struck down EPA's 1998 "Periodic Monitoring Guidance for Title V Operating Permits Program," holding that "[s]tate permitting

authorities therefore may not, on the basis of EPA's Guidance or 40 C.F.R. § 70.6(a)(3)(i)(B), require in permits that the regulated source conduct more frequent monitoring of its emissions than provided in the applicable State or federal standard, unless that standard requires no testing, specifies no frequency, or requires only a one-time test." If a standard contains "periodic monitoring," the state cannot question its adequacy or impose additional requirements without going through notice and public comment rulemaking.

Notwithstanding this, Condition D.1.8(b)(2) provides that each temperature monitoring device must be equipped with a "continuous recorder," and that, for purposes of measuring temperatures of the thermal oxidizer, continuous shall mean "no less often than once per minute." See also, Condition D.1.12(a)(1). 40 C.F.R. § 63.5150(a)(3)(i) from which this condition is derived does not contain the provision that "continuous" equals once per minute. However, 40 C.F.R. § 63.5160(d)(3)(i)(A) does provide that during the performance test, the temperature of the oxidizer must be monitored and recorded "at least once every 15 minutes during each of the three test runs." Subsequent compliance monitoring must be performed in a manner consistent with monitoring practices during the initial performance test. Conditions D.1.8(b)(2) and D.1.12(a)(1) must be revised by changing "once per minute" to "once every 15 minutes."

Response #9

IDEM agrees that the NESHAP does not define "continuous" for the purposes of continuous monitoring. While it is unclear what "continuous monitoring" means under the NESHAP, IDEM has the authority to require continuous temperature monitoring in order to demonstrate compliance with the limits to render PSD not applicable. Continuous monitoring of temperature is more important for the purposes of determining compliance with the PSD minor limit because, while the NESHAP requires a limit based on an average, the PSD minor limit is a total mass emission limit. When demonstrating compliance with a limit based on an average, such as the limit in the NESHAP, significant drops in temperature for short periods of time are not as consequential. However, a significant drop in temperature for even a short period of time could result in a large amount of emissions. If such drops in temperature were to occur frequently, even for short durations, the source could easily exceed the limit necessary to render PSD not applicable. Therefore, IDEM has determined that monitoring the temperature at least once per minute is appropriate and necessary. IDEM has revised Section D.1 so that Condition D.1.8 citing the NESHAP requirements does not define "continuous monitoring" as once per minute. Rather, the requirement to monitor the temperature once per minute is now in Condition D.1.12 that requires monitoring for the purposes of demonstrating compliance with 326 IAC 8-2-4 and the PSD minor limit. All changes to Section D.1 are shown at the end of this addendum.

Comment #10

Edcoat suggests the following condition for demonstrating compliance with the NSPS, NESHAP, 326 IAC 8-2-4, and the PSD minor limits.

D1.9 Applicability of Control Device to Compliance Calculations for NSPS [326 IAC 12-1][40 CFR Part 60, Subpart TT], PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21], Volatile Organic Compounds (VOC) [326 IAC 8-2-4]

The current overall reduction efficiency may be used in calculations to demonstrate compliance with the above regulations only when the thermal oxidizer operating temperature maintains a three hour average above the average operating temperature of the thermal oxidizer when the overall reduction efficiency was determined and total permanent enclosure of the operating coating room(s) is maintained.

Response #10

Condition D.1.8 has been revised to more accurately explain when the overall reduction efficiency of the control device can be used for the purposes of demonstrating compliance with the NESHAP. Edcoat and IDEM both agree that this same procedure can be used to demonstrate compliance with the NSPS. However, for the purposes of demonstrating compliance with the limit to render PSD not applicable, IDEM requires monitoring the temperature on a one-hour average and taking response steps if the temperature is below the required minimum. Therefore, condition D.1.8 does not cite the PSD rule or 326 IAC 2-8-4. All changes to Section D.1 are shown at the end of this addendum.

Comment #11

Edcoat suggests the following condition in place of D.1.9(c).

D.1.10 Analysis of Coating for Compliance Calculations

The analysis of coatings for the purpose of compliance calculations shall be as prescribed in 40CFR 63.5160 (b) and (c). Procedures for VOC content shall be the same as for HAP.

Response #11

IDEM believes that 40 CFR 63.5160 (d) is also applicable since Edcoat does not meet any of the exemptions listed in 40 CFR 63(a). Therefore, Condition D.1.9(b) cites 40 CFR 63.5160 (b), (c), and (d) and requires that Edcoat conduct a performance test to demonstrate the overall control efficiency of the oxidizer.

Comment #12

Please include the following condition in the permit.

D.1.11 Compliance Determination for NSPS [326 IAC 12-1][40 CFR Part 60, Subpart TT]

The source shall perform a monthly compliance test in accordance with 40 CFR 60.463.

Response #12

The Condition has been included as Condition D.1.11 in the revised permit. All changes to Section D.1 are shown at the end of this addendum.

Comment #13

Edcoat suggests the following condition to describe the method for demonstrating compliance with the PSD minor limit.

D.1.12 Compliance Determination for PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

Compliance with this limit shall be demonstrated by totaling the following on a monthly basis:

- (1) the total mass of VOC used without a control device (40 CFR 60.463, Equation 13).
- (2) the total mass of VOC used with the control device (40 CFR 60.463, Equation 15) multiplied by one minus the overall reduction efficiency.
- (3) the total mass of clean-up solvents used during the month.

If the twelve month rolling average for any period exceeds 247 tons, the VOC emissions from all combustion sources must be added to the total to determine compliance.

Response #13

With the exception of the last sentence, IDEM agrees with the proposed language. The proposed condition, except for the last sentence, has been included as Condition D.1.12 of the permit. The last sentence has not been included because the limit for the roll coil coating operation is 247 tons per 12 consecutive month period. There is no enforceable limit on combustion emissions. See also response to comment #6. The revised Section D.1 is shown at the end of this addendum.

Comment #14

In *Appalachian Power Co. v. EPA*, 208 F.3d 1015 (D.C. Cir. 2000), the court struck down EPA's 1998 "Periodic Monitoring Guidance for Title V Operating Permits Program," holding that "[s]tate permitting authorities therefore may not, on the basis of EPA's Guidance or 40 C.F.R. § 70.6(a)(3)(i)(B), require in permits that the regulated source conduct more frequent monitoring of its emissions than provided in the applicable State or federal standard, unless that standard requires no testing, specifies no frequency, or requires only a one-time test." If a standard contains "periodic monitoring," the state cannot question its adequacy or impose additional requirements without going through notice and public comment rulemaking.

Condition D.1.9(b) requires that performance compliance tests be performed within 30 months after permit issuance and repeated at least once every 30 months. Edcoat has already performed an initial performance test under 40 C.F.R. § 60.463. Following the determination of overall destruction efficiency during the test, 40 C.F.R. § 60.465(c) requires periodic monitoring of the combustion temperature of effluent gases, and the recording of all periods in excess of 3 hours during which the average incinerator temperature remains more than 50° F below the temperature at which compliance was demonstrated during the initial performance test. Because the NSPS provides for "periodic monitoring," the state permitting authority cannot require more stringent testing or monitoring requirements without going through rulemaking. In addition, as a practical matter, Edcoat will have to perform an additional initial performance test in 2005 under the NESHAPs. Nevertheless, because of the provisions of 40 C.F.R. § 60 Subpart TT and 40 C.F.R. § 63 Subpart SSSS, IDEM cannot require a report performance test within 30 months nor can it require that the test be repeated every 30 months thereafter.

There is also a scientific argument as to why periodic testing is not necessary to assure proper operation of the thermal oxidizer. Destruction of VOC is accomplished purely by reaching a given temperature, which is monitored during operation. Nothing can "go wrong" with this type of emissions control. If this were a catalytic converter, we would agree that there is the potential for loss of efficiency and periodic testing would be justified. This is not the case with thermal oxidation. Each test costs Edcoat in excess of \$30,000. Edcoat strongly objects to performing this testing when it has no environmental benefit. If this issue cannot be resolved at this stage of the permitting process, there will be an appeal.

In Section D.1.9(a) the monthly performance test does not calculate the overall reduction efficiency. The overall reduction efficiency, as determined by the initial or subsequent performance (stack) tests, is used to calculate the monthly performance test.

In Section D.1.9(c) the phrase "perform the testing to" should be removed. The regulations provide for methods other than testing to determine HAP content and solids content of coatings.

Edcoat suggests the following language for the testing condition:

D.1.9 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11][40 CFR 60.463]

Pursuant to 40 CFR 60.463 (b), the initial performance test for this source was conducted on August 31 and September 1, 1998. This test established an overall reduction efficiency of 94.5% and the existence of a permanent total enclosure for each of the coating rooms. The procedure described in 40 CFR 60.463 (c)(2)(i)(A), (B), and (C) shall be repeated when directed by the Administrator or when the source operates the control device or capture system at conditions different from the initial performance test.

Response #14

IDEM is aware of the ruling by the D.C. Circuit Court of Appeals to set aside EPA's September 15, 1998 "Periodic Monitoring Guidance for Title V Operating Permits Program." However, the court's ruling does not affect IDEM's ability to require compliance monitoring for Part 70 sources because Indiana's Part 70 rules at 326 IAC 2-7-5 are more stringent than the federal Part 70 rules, with respect to compliance monitoring and stack test requirements. Regardless, neither the NSPS nor the NESHAP requires more than a one-time stack test on the oxidizer; therefore, the ruling by the D.C. Circuit Court of Appeals would not prevent IDEM from including a requirement to periodically repeat the stack test in the Part 70 permit.

IDEM disagrees with Edcoat's position that the only relevant factor in determining proper operation of the oxidizer is temperature. While temperature is certainly an important factor, other factors are also relevant, such as residence time and the type of VOC being destructed. Different types of VOC require slightly different temperatures and residence times to destruct. The requirement to stack test the oxidizer every 30 months remains in the permit.

Section D.1.9(a) has been deleted from the permit. The requirement to stack test pursuant to the NESHAP is already included in paragraph (c) of D.1.9. The requirement to test for HAP content has been revised to require compliance with 40 CFR 63.5160. The method of calculating emissions is also described in paragraph (c) of D.1.9. Please note that paragraph (c) has now been relabeled as paragraph (b) in this condition. All revisions to Section D.1 are shown at the end of this addendum.

Comment #15

The "Compliance Monitoring Requirement" section should contain a consolidated set of requirements for determining if the thermal oxidizer and capture system are operating at a level that is satisfactory for taking credit for control of emissions. This would include maintenance requirements and accuracy requirements for the instruments involved. Note that there is some disagreement between regulations on the accuracy requirements. As Edcoat has stated previously, combining these into a single set of criteria based on the most stringent of each is acceptable. This section would also describe conditions requiring the Compliance Response Plan to be activated. Edcoat has agreed that any one-hour deviation in monitoring parameters should initiate a response step.

Condition D.1.11(e) provides that the thermal oxidizer shall maintain an average hourly operating temperature of 1312° F. The requirement for an hourly average also appears in Condition D.1.3(a). Edcoat recognizes that there is no periodic monitoring requirement contained in rule 8-2-4 or in the general provisions of rule 8-1. However, the imposition of a minimum average hourly operating temperature is arbitrary, capricious and illegal for three reasons. First, it is more stringent than the applicable NSPS and the NESHAPs effective June 10, 2005. The NSPS only requires recording and reporting of all times when the average temperature is more than 50° F below the average achieved during the compliance test for a period of 3 hours or more. The NESHAPs establishes a minimum 3-hour average. Second, the proposed limit is, by definition, indefensible. The temperature of 1312° F represents the average of the average temperatures measured during each of the three one-hour test runs. Because at least one of the hourly averages had to be below 1312° F (unless all three were exactly 1312° F), you cannot legitimately turn an

average of three one-hour averages into an hourly minimum. Finally, in addition to the NSPS and NESHAPs, one can legitimately look to other IDEM monitoring requirements for guidance as to what may be appropriate. Rule 8-1-12 establishes compliance certification, record keeping and reporting requirements for graphic arts operations. Subsection (c)(6) requires, for thermal incinerators, continuous recording of the T.O. temperature and recording of all 3-hour periods when the average temperature is more than 50° F below the average that existed during the most recent successful performance test. Condition D.1.11(e) must be revised to reflect the language of 326 I.A.C. § 8-1-12(c)(6), or the NSPS.

In Section D.1.11(e) it is proported that a coating must have less than 6.82 pounds per gallon of coating less water when the thermal oxidizer is operating at an efficiency of 94.5% to comply with the 326 IAC 8-2-4 limit of 2.6 pounds of VOC per gallon of coating less water. This is obviously wrong. $2.6/(100-94.5) = 47.27$. This is clearly impossible as no VOC weighs 47.27 pounds per gallon. Therefore, it is appropriate to forgo any calculation to demonstrate compliance on days that thermal oxidizer is used continuously and operates properly. A coating that is "less water" is, by definition, composed solely of VOC and solids. We agree with the IDEM calculation that the equivalent limit to 2.6 pounds of VOC per gallon of coating, less water, is 4.02 pounds of VOC per gallon of coating solids. On this basis, the limit for coating formulation with a thermal oxidizer efficiency of 94.5% would be 73.1 pounds of VOC per gallon of coating solids.

Edcoat suggests the following language to replace D.1.11(e):

D.1.11 Compliance Determination for VOC [326 IAC 8-2-4]

When operating the thermal oxidizer to achieve the limit for rule 326 IAC 8-2-4, the thermal oxidizer shall operate properly and maintain an average operating temperature of 1312 °F, or the most recently tested temperature to achieve a reduction efficiency, R, of 94.5%, or the most recently tested R. Operating the thermal oxidizer at an average temperature of 1312 °F or higher for an entire day to demonstrate a reduction efficiency of 94.5% will demonstrate compliance with the requirements of 326 IAC 8-2-4 and Condition D.1.7 for that day.

For days when the thermal oxidizer is used intermittently during the day, or not used at all during the day, the achievement of the limit shall be based on the following equation:

$$A = [3 (C * U) / 3 U]_{NT} + [(100\% - R) [3 (C * U) / 3 U]_T] \# 2.6 \text{ lb VOC/gal}$$

- A = Daily volume weighted average in pounds VOC per gallon
- C = VOC content of coating in pounds VOC per gallon
- U = usage rate of coating in gallons per day
- R = 94.5 %, or the latest tested reduction efficiency

NT refers to applications during which the oxidizer is not operated at or above an average temperature of 1312°F, or the latest tested temperature

T refers to applications during which the oxidizer is operated at or above an average temperature of 1312°F, or the latest tested temperature

Response #15

IDEM agrees that the compliance monitoring provisions of the permit should be consolidated as much as possible. Since Edcoat has agreed to accept a combination of the most stringent of the NSPS and NESHAP requirements for accuracy of temperature readings (+/- 1°C or +/- 0.75 percent), that combination has been included in Condition D.1.12 of the permit. The requirement to maintain the 3-hour average temperature above the temperature determined during the stack test has been included in

Condition D.1.8(a) which is the condition describing the requirements of the NESHAP. This condition is listed in the Compliance Determination Section of the permit because it is a direct measurement of compliance. The requirement to maintain the one-hour average temperature above the temperature determined during the stack test is included in Condition D.1.12(a)(1). This condition is listed in the Compliance Monitoring Section of the permit because failure to maintain the one-hour average temperature above the minimum is not a deviation from the permit. Rather, Edcoat is required to take an appropriate response step when the one-hour average temperature drops below the minimum. Failure to take an appropriate response step would be considered a deviation.

IDEM agrees with Edcoat's calculations of equivalent VOC content of coatings that can be used when the oxidizer is in operation. IDEM agrees compliance with 326 IAC 8-2-4 can be assumed if the oxidizer operates properly for the entire day. Condition D.1.11(e) has been revised to reflect these changes. All changes to Section D.1 are shown at the end of this addendum.

Comment #16

In Condition D.1.13 (NESHAP - Surface Coating of Metal Coil - Record Keeping Requirements), Edcoat suggests adding the compliance date of the NESHAP.

Response #16

IDEM agrees. The compliance date has been added to the condition. All changes to Section D.1 are shown at the end of this addendum.

Comment #17

Section D.1.12(a)(4) requires monitoring of the "differential pressure" in the coating room. This is a possible parameter to be measured as a demonstration the capture is being maintained as prescribed in the NESHAP. However, the NESHAP allows the operator to choose the parameter to be monitored. Edcoat reserves the right to make this decision when the NESHAP compliance is implemented. Until then, there will be no test data on which to base such a requirement.

Edcoat suggests the following language:

All monitoring of capture and control systems shall be as specified in 40CFR 63.5150, with the following exceptions:

- (1) Until the initial performance test specified in 40 CFR 63.5160 is satisfactorily completed, no compliance monitoring parameter is available for capture. Compliance with capture requirements shall be defined as maintaining permanent total enclosure conditions for each operating coating room until the capture parameter is available.

Response #17

Edcoat is currently required to maintain 100% capture in order to demonstrate compliance with the limit to render PSD not applicable. Therefore, it is appropriate for IDEM to require Edcoat to monitor a parameter that demonstrates good capture now, rather than wait until 2005 when Edcoat will be required to comply with the NESHAP. IDEM realizes that during the previous stack test Edcoat did not measure differential pressure or any other parameter to demonstrate good capture. However, the Part 70 permit Condition D.1.9 requires Edcoat to conduct another performance test within 30 months after issuance of

this permit. During this stack test, Edcoat will be required to monitor differential pressure. Condition D.1.12(a)(4) requires daily monitoring of differential pressure only after the stack test has been performed to establish the appropriate range.

Comment #18

Section D.1.14(a)(1) requires record keeping of "...VOC usage for each quarter,...". First record keeping requirements should be limited to data only. The compliance determination section describes how the data is to be analyzed. Second, VOC usage is no longer regulated, only VOC emissions. (VOC usage was limited by the construction permit until the initial performance test took place.) Third, there is no emission that is regulated by quarters. This is a good example of why we feel that the only way to "fix" Section D is to start from a blank sheet.

Edcoat suggests deleting D.1.14(a)(1).

Response #18

For times when the oxidizer is not in operation, Edcoat will rely on VOC usage data to demonstrate compliance with the limits in the permit. Therefore, it is appropriate and necessary for the permit to require records of VOC usage. IDEM agrees that no regulations include limits per quarter. The condition has been changed to state that records shall be kept of VOC usage each month, rather than each quarter. All changes to Section D.1 are shown at the end of this addendum.

Comment #19

D.1.14(a)(2) should include a requirement to document the beginning and ending times of any interruptions during a batch.

D.1.14(a)(6)(B) should include the option of keeping records in units of pounds of VOC per gallon of coating solids.

Response #19

IDEM agrees. These changes have been made to Condition D.1.14. All changes to Section D.1 are shown at the end of this addendum.

Comment #20

In Condition D.1.13(b)(1), the reference to 40 CFR 63.5150(a)(1) is unnecessary because the only bypass in this system is the emergency bypass that is exempt under the regulation. Paragraph D.1.13(c) should be deleted because it is only a requirement for area sources.

Response #20

Reference to 40 CFR 63.5150(a)(1) has been deleted. Paragraph (c) has also been deleted.

Comment #21

The form labeled "Part 70 Quarterly Report" raises several issues.

- 1) The primary issue is that none of the regulations specifically requires reporting of deviations or compliance by submitting such detailed information. Whether product names or just constituents are listed, this level of detail would constitute competitive information that Edcoat would request be handled under confidential procedures. Edcoat recognizes the need to tabulate compliance calculations for regulatory review, but requests that they be allowed to retain this information as on-site records. This information would be available to IDEM inspectors and could be copied for off-site review if handled as confidential material.
- 2) As discussed above, there is no justification for quarterly reporting of compliance. Federal regulations require only semi-annual reporting of compliance, deviations are reported quarterly. Since the federal regulations are more restrictive than the State regulations, more frequent reporting under the State regulations is without merit. If the State insists on a more stringent reporting schedule, it must be listed as a "State only" requirement.
- 3) The table in the form has a column labeled "Oxidizer operation at required temperature (yes/no)". This implies that if temperature is not maintained during a batch, the entire batch will not be credited with emissions control. This is not consistent with the regulations. Only when the temperature averages below the limit for more than three hours is no credit for control of emissions given and then only for the period of the actual excursion. The balance of the batch should be credited with control of emissions. Also, the instructions indicate that the oxidizer must operate during clean-up. This is not required by any regulation. Typically, oxidizers cannot achieve the required temperature during clean-up because the curing ovens are off so the oxidizer inlet air is at ambient, not the typical 700 to 800 degrees when coating is being cured. Further the solvent loading is so low that it does not contribute significant fuel value to the oxidizer, nor does it represent a significant level of emissions. For all of the above reasons, it is not necessary to record clean-up solvent usage on a batch basis.
- 4) The column labeled "Input VOC from clean-up solvents" is inappropriate for all of the coating regulations because they are on an "as applied" basis.
- 5) This form is missing many items of information that would be required to determine compliance with the coating regulations listed on the front of the form. It appears that the only regulation that could be enforced from this form is PSD. Edcoat objects to using this format for PSD compliance reporting because it is duplicative of calculations made to show compliance with the other regulations. We have proposed in the attached draft permit, a basis for calculating PSD compliance using calculations that are required for NSPS.

Response #21

IDEM has authority to require quarterly reports. Reports must be submitted at least every six months under 326 IAC 2-7-5(3)(C)(i). IDEM believes that a period of time longer than every quarter will not provide sufficient reporting of continuous compliance.

The purpose of the quarterly report form is only to show compliance with the limit to render PSD not applicable. IDEM has made several revisions to the form based on the above comments. However, the Permittee may create another form to use as long as the information submitted is sufficient to demonstrate compliance with the PSD minor limit.

Revisions to Section D.1 are shown below:

SECTION D.1 FACILITY OPERATION CONDITIONS

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

- (a) A roll coil prime coating application system, consisting of a roll coater, flow out section, and flash off section, including a natural gas fired bake oven, constructed in June 1996, with a maximum capacity of 60,000 pounds per hour, using the thermal oxidizer as control, and exhausting to stack SV-14. **This coating station is capable of coating both sides of the sheet.**
- (b) A roll coil **finish**/top coating application system, consisting of a roll coater, flow out section, and flash off section, including a natural gas fired bake oven, constructed in June 1996, with a maximum capacity of 60,000 pounds per hour, using the thermal oxidizer as control, and exhausting to stack SV-14. **This coating station is capable of coating both sides of the sheet.**

Notes: Sometimes only one coating is applied, making the prime system the top or finish system.

The following process burners serve the bake ovens in the coating application systems:

- (1) Six model 4988R-2500 natural gas fired process burners, each rated at 2.5 million Btu per hour, constructed in June 1996
- (2) Four model 4988R-4000 natural gas fired process burners, each rated at 4.0 million Btu per hour, constructed in June 1996
- (3) Four model 4988R-6000 natural gas fired process burners, each rated at 6.0 million Btu per hour, constructed in June 1996

Note: The prime and top coating systems operate in sequence to produce an end product. No intermediate products within the activity/process serve as end products.

- (c) A natural gas fired thermal oxidizer that controls emissions from the paint line, coating rooms, ovens, paint storage, and mixing area, rated at 30 million Btu per hour, constructed in June 1996, and exhausting to stack SV-14

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

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

D.1.1 General Provisions Relating to NSPS [326 IAC 12-1][40 CFR Part 60, Subpart A]

The provisions of 40 CFR Part 60, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 12-1, apply to the coil coating lines described in this section except when otherwise specified in 40 CFR Part 60, Subpart TT.

D.1.2 General Provisions Relating to NESHAP [326 IAC 20-1][40 CFR Part 63, Subpart A]

On and after June 14, 2002, the provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 20-1, apply to the coil coating lines described in this section except when otherwise specified in 40 CFR Part 63, Subpart SSSS.

D.1.23 New Source Performance Standards (NSPS) Subpart TT - Metal Coil Surface Coating [326 IAC 12 and 40 CFR 60.462]

Pursuant to 326 IAC 12 and 40 CFR 60.462(a)(4), the metal coil coating process shall not discharge into the air in excess of a value between 0.14 (or a 90% VOC emission reduction) and 0.28 kg VOC/l of coating solids applied for each calendar month. The definition of "month" as defined in 40 CFR 63.5110 shall apply to this limit as long as the Permittee predefines "month" in such a way that there is at least one 5-week month in each calendar quarter.

D.1.34 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

(a) ~~From the date of issuance of this permit until the approved stack test results (required by Condition D.1.9) are available, the input VOC shall be limited such that:~~

~~5.5% of input VOC, including coatings, dilution solvents, and cleaning solvents, during operation of the thermal oxidizer at or above the average hourly temperature of 1312°F to achieve the thermal oxidizer reduction efficiency of 94.5%,~~

~~plus~~

~~100% of VOC input, including coatings, dilution solvents, and cleaning solvents, during times when the thermal oxidizer is not operated at or above the average hourly temperature of 1312°F,~~

~~shall be less than 247 tons of VOC per 12 consecutive month period with compliance demonstrated at the end of each month. This limit, along with the potential to emit 2.1 tons of VOC per year from the combustion units, is required to limit the source's potential to emit VOC to less than 250 tons per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.~~

(b) ~~On and after the date the approved stack test results (as required by Condition D.1.9) are available, the input VOC shall be limited such that:~~

~~(100% - R) of input VOC, including coatings, dilution solvents, and cleaning solvents, during operation of the thermal oxidizer at or above the average hourly temperature as observed during the compliant stack test to achieve R and compliance with 326 IAC 8-2-4, 40 CFR 60.462, and 40 CFR 63.5120, where R is the thermal oxidizer reduction efficiency demonstrated during the compliant stack test,~~

~~plus~~

~~100% of VOC input, including coatings, dilution solvents, and cleaning solvents, during times when the thermal oxidizer is not operated at or above the average hourly temperature determined during the compliant stack test,~~

~~shall be less than 247 tons of VOC per 12 consecutive month period with compliance demonstrated at the end of each month. This usage limit, along with the potential to emit 2.1 tons of VOC per year from the combustion units, is required to limit the source's potential to emit VOC to less than 250 tons per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.~~

- (c) The definition of "month" at 40 CFR 63.5110 shall apply to the limits in this condition as long as the Permittee predefines "month" in such a way that there is at least one 5-week month in each calendar quarter.
- (d) ~~Any change or modification from the equipment covered in this permit, which may increase the potential to emit to greater than 250 tons per consecutive twelve (12) month period, shall require a PSD permit pursuant to 326 IAC 2-2, before such change may occur.~~

~~D.1.4 General Provisions Relating to NESHAP [326 IAC 20-1][40 CFR Part 63, Subpart A]~~

~~On and after June 14, 2002, the provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference in 326 IAC 20-1, apply to the coil coating lines described in this section except when otherwise specified in 40 CFR Part 63, Subpart SSSS.~~

D.1.5 NESHAP - Surface Coating of Metal Coil – Emission Limits [40 CFR 63 Subpart SSSS]

On and after June 10, 2005, each coil coating line must limit organic HAP emissions to the following level specified in **paragraph (a), (b), or (c)**:

- (a) No more than 2 percent of the organic HAP applied for each month during each 12-month compliance period (98 percent reduction); or
- (b) No more than 0.046 kilogram (kg) of organic HAP per liter of solids applied during each 12-month compliance period; or
- (c) If an oxidizer is used to control organic HAP emissions, the oxidizer must be operated such that an outlet organic HAP concentration of no greater than 20 parts per million by volume (ppmv) on a dry basis is achieved and the efficiency of the capture system is 100 percent.

The Permittee must demonstrate compliance with one of these standards by following the applicable procedures in 40 CFR 63.5170.

D.1.6 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

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

Pursuant to 326 IAC 8-2-4 (Coil Coating Operations), and CP 141-4731-00102 issued March 7, 1996, the owner or operator of the coil coating operation may not cause, allow or permit the discharge into the atmosphere any VOC in excess of 2.6 pounds per gallon, excluding water, delivered to the applicator. **This limit is equivalent to 4.02 pounds of VOC per gallon of coating solids.**

Compliance Determination Requirements

D.1.8 NESHAP - Surface Coating of Metal Coil – Monitoring [40 CFR 63 Subpart SSSS]

On and after June 10, 2005, each coil coating line must comply with the following requirements:

- (a) For the purposes of demonstrating compliance with the emission limits in D.1.5 and 40 CFR 63.5120, ~~no credit will be given for control of VOC if the average combustion temperature of the thermal oxidizer in any 3-hour period falls below~~ **the current overall reduction efficiency may be used in calculations to demonstrate compliance only**

when total permanent enclosure of the coating room is maintained and the thermal oxidizer operating temperature is maintained at or above the combustion temperature limit established according to 40 CFR 63.5160(d)(3)(i).

- (b) For the purposes of demonstrating compliance with the emission limits in D.1.5 and 40 CFR 63.5120, no credit will be given for control of VOC unless the following requirements are met:
- (1) Each capture system and control device used to demonstrate compliance with the emission limits established in 40 CFR 63.5120 and Condition D.1.5 shall be monitored and inspected following the date on which the initial performance test of the capture and control system is completed. The following monitoring equipment must be installed and operated.
 - (A) Install, calibrate, maintain, and operate temperature monitoring equipment according to manufacturer's specifications. The calibration of the chart recorder, data logger, or temperature indicator must be verified every 3 months; or the chart recorder, data logger, or temperature indicator must be replaced. The equipment must be replaced either if the calibration is not performed or the equipment cannot be calibrated properly. Each temperature monitoring device must be equipped with a continuous recorder. For the purposes of measuring temperature of the thermal oxidizer, continuous shall mean no less often than once per minute. The device must have an accuracy of plus or minus 1 percent of the temperature being monitored in degrees Celsius, or plus or minus 1 degree Celsius, whichever is greater.
 - (B) For the thermal oxidizers, to demonstrate compliance with the operating limit established according to 40 CFR 63.5160(d)(3)(i), a thermocouple or temperature sensor shall be installed in the combustion chamber at a location in the combustion zone.
 - (C) If a control device is used to comply with the standards in 40 CFR 63.5120, the Permittee shall develop a capture system monitoring plan containing the information specified below. The monitoring plan must be made available for inspection by IDEM, OAQ upon request.
 - (I) The monitoring plan must identify the operating parameter to be monitored to ensure that the capture efficiency measure during the initial compliance test is maintained, explain why this parameter is appropriate for demonstrating ongoing compliance, and identify the specific monitoring procedures.
 - (II) The plan must also specify operating limits at the capture system operating parameter value, or range of values, that demonstrates compliance with the standards in 40 CFR 63.5120. The operating limits must represent the conditions indicative of proper operation and maintenance of the capture system.

(III) The Permittee must conduct monitoring in accordance with the plan.

(2) Any deviation from the required operating parameters in 40 CFR 63.5150(a)(3) and (4) will be considered a deviation from the operating limit, unless otherwise excused.

D.1.9 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11][40 CFR 60.463]
[40 CFR 63 Subpart SSSS]

~~(a) Pursuant to 40 CFR 60.463, following the initial performance test, the source shall conduct monthly performance testing to calculate overall reduction efficiency. The reduction efficiency determined from the most recent performance test may be used for monthly testing, providing the control device and capture system operating conditions have not changed. The procedure described in 40 CFR 60.463 (c)(2)(i)(A), (B), and (C) shall be repeated when directed by the Administrator or when the source operates the control device or capture system at conditions different from the initial performance test.~~

(b) Within 30 months after issuance of this Part 70 permit, the Permittee shall perform compliance tests for VOC emissions, destruction efficiency, and overall reduction efficiency, according to 326 IAC 3-6 (Source Sampling Procedures), using the methods specified in the rule or as approved by the Commissioner. The tests shall determine an **appropriate duct flow rate, differential pressure, or other parameter range which is indicative of achieves optimum VOC destruction capture efficiency.** These tests shall be repeated at least once every 30 months following the date of each valid compliance demonstration to show compliance with the VOC limits specified in Conditions D.1.1, D.1.2, and D.1.7. The Permittee shall also demonstrate compliance with the following criteria for permanent total enclosure of the ~~thermal oxidizer~~ **coating rooms:**

(1) Any Natural Draft Opening (NDO) shall be at least four equivalent opening diameters from each VOC emitting point. NDO is any permanent opening in the enclosure which remains open during the operation of the facility and is not connected to a duct in which a fan is installed.

(2) The total area of all NDO's shall not exceed five percent of the surface area of the enclosure's four walls, floor, and ceiling.

(3) The average facial velocity (FV) of air through all NDO's shall be at least 3,600 m/hr (200 fpm). The direction of air through all NDO's shall be into the enclosure.

(4) All access doors and windows whose areas are not included in condition (2) and are not included in the calculation of condition (3) shall be closed during routine operation of the process.

(5) All VOC emissions must be captured and contained for discharge through a control device.

~~(c)~~(b) Pursuant to 40 CFR 63, Subpart SSSS, the Permittee shall perform the testing to determine the organic HAP content of each coating, the solids content of each coating, and the control device destruction or removal efficiency **as specified in 40 CFR 63.5160(d). Pursuant to 40 CFR 63, Subpart SSSS, the Permittee shall determine**

the organic HAP content of each coating and the solids content of each coating as specified in 40 CFR 63.5160 (b), (c), and (d) in order to demonstrate compliance with the limits established in 40 CFR 63.5120 and Condition D.1.5 of this permit.

D.1.10 NESHAP - Surface Coating of Metal Coil – Demonstrating Compliance [40 CFR 63 Subpart SSSS]

On and after June 10, 2005, compliance ~~Compliance~~ with the provisions of 40 CFR 63.5120 and Condition D.1.5 of this permit shall be demonstrated as specified in 40 CFR 63.5170.

D.1.11 Compliance Determination for NSPS [326 IAC 12-1] [40 CFR 60, Subpart TT]

The source shall perform a monthly compliance test in accordance with 40 CFR 60.463.

D.1.12 Compliance Determination for PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

Compliance with the limit in Condition D.1.4 shall be demonstrated by totaling the following on a monthly basis:

- (1) the total mass of VOC used without a control device (40 CFR 60.463, Equation 13);**
- (2) the total mass of VOC used with the control device (40 CFR 60.463, Equation 15) multiplied by one minus the overall reduction efficiency as determined by the most recent IDEM-approved stack test; and**
- (3) the total mass of clean-up solvents used during the month.**

D.1.14 Compliance Determination for Volatile Organic Compounds (VOC) [40 CFR 60.462] [326 IAC 8-2-4]

~~(a) The thermal oxidizer shall operate properly at all times that the roll coil coating application process is operated to achieve the tested reduction efficiency, R, through the operation of the thermal oxidizer at a temperature greater than or equal to the average hourly tested temperature.~~

~~(b) Duct flow rate shall be maintained within a range that provides optimum VOC destruction, as determined during the most recent performance tests, and the system shall achieve permanent total enclosure.~~

~~(c) When not using the thermal oxidizer, the VOC content and usages used to demonstrate compliance with the limits contained in Condition D.1.7 shall be determined by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets, and following procedures for determining monthly volume-weighted average emissions as described in 40 CFR 60.463(c)(4) and daily-weighted average emissions described in 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a). 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) Compliance with Condition D.1.3 shall be demonstrated within 30 days of the end of each ~~quarter~~ **month** for the most recent twelve (12) month period.~~

~~(e) When operating the thermal oxidizer to achieve the limit for rule 326 IAC 8-2-4, the thermal oxidizer shall operate properly and maintain an average hourly operating temperature of 1312 °F, or the most recently tested temperature to achieve a reduction efficiency, R, of 94.5%, or the most recently tested R. Operating the thermal oxidizer at~~

an average hourly temperature of 1312 °F or higher for an entire day to demonstrate a reduction efficiency of 94.5% while ~~using coatings less than 6.82 pounds per gallon of coating less water~~ **maintaining 100% capture**, will demonstrate compliance with the requirements of 326 IAC 8-2-4 and Condition D.1.7 for that day.

For days when the thermal oxidizer is used intermittently during the day, or not used at all during the day, the achievement of the limit shall be based on the following equation:

$$A = [3 (C * U) / 3 U]_{NT} + [(100\% - R) [3 (C * U) / 3 U]_T] \# 2.6 \text{ lb VOC/gal}$$

- A = Daily volume weighted average in pounds VOC per gallon
- C = VOC content of coating in pounds VOC per gallon
- U = usage rate of coating in gallons per day
- R = 94.5 %, or the latest tested reduction efficiency

NT refers to applications during which the oxidizer is not operated at or above an average hourly temperature of 1312°F, or the latest tested temperature

T refers to applications during which the oxidizer is operated at or above an average hourly temperature of 1312°F, or the latest tested temperature

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

D.1.124 Monitoring

- (a) If the thermal oxidizer is used intermittently or continuously to demonstrate compliance with Conditions D1.2, D.1.3, D.1.5, and D.1.7, the following conditions shall apply:
- (1) The thermal oxidizer chamber temperature shall be continuously monitored and recorded to demonstrate compliance with 326 IAC 2-2, 326 IAC 8-2-4, ~~40 CFR 60.464, 40 CFR 60.465~~ **and Conditions D.1.4 and D.1.7**. For the purpose of measuring the temperature of the thermal oxidizer, continuous shall mean no less often than once per minute. The temperature measurements shall be reduced to 1-hour block averages. **The Permittee shall take appropriate response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports whenever the hourly average temperature of the thermal oxidizer is below 1312 °F. An hourly average temperature that is below 1312 °F is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.**
 - (2) The thermal oxidizer shall have an accuracy of +/- 1°C or +/- 0.75 percent of the temperature being measured expressed in degrees Celsius, whichever is greater.
 - (3) The capture system (i.e. the coating rooms) for the metal coil coating operation shall achieve total permanent enclosure.
 - (4) Differential pressure in the coating room, **or another parameter indicative of capture efficiency**, shall be maintained within a range established in the most

recent compliance test to achieve the tested emission reduction. Differential pressure in the coating room, **or another parameter indicative of capture efficiency**, shall be measured at least once per **week day** after the appropriate differential pressure (**or other parameter**) has been established through an approved compliance test.

The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports, shall be considered a violation of this permit.

- (b) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

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

D.1.13~~5~~NESHAP - Surface Coating of Metal Coil – Record Keeping Requirements [40 CFR 63 Subpart SSSS]

Pursuant to 40 CFR 63.5190, **on and after June 10, 2005**, the Permittee shall maintain the records as specified below.

- (a) Pursuant to 40 CFR 63.5190, the Permittee shall maintain the records of the coating lines on which the Permittee used each compliance option and the time periods (beginning and ending dates and times) the Permittee used each option.
- (b) Pursuant to 40 CFR 63.5190, the Permittee shall maintain the records specified in 40 CFR 63.10(b)(2) of all measurements needed to demonstrate compliance with 40 CFR 63, Subpart SSSS, including:
 - (1) control device and capture system operating parameter data in accordance with 40 CFR 63.5150(a)~~(1)~~,~~(3)~~, and (4);
 - (2) organic HAP content data for the purpose of demonstrating compliance in accordance with 40 CFR 63.5160~~(a)~~**(b)**;
 - (3) volatile matter and solids content data for the purpose of demonstrating compliance in accordance with 40 CFR 63.5160(c);
 - (4) overall control efficiency determination or alternative outlet HAP concentration using capture efficiency tests and control device destruction or removal efficiency tests in accordance with 40 CFR 63.5160(d),~~(e)~~, and **(e)** ~~(f)~~; and
 - (5) material usage, HAP usage, volatile matter usage, and solids usage and compliance demonstrations using these data in accordance with 40 CFR 63.5170(a), (b), and (d).

- ~~(c) Pursuant to 40 CFR 63.5190, the Permittee shall maintain the records specified in 40 CFR 63.10(b)(3).~~

D.1.146 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.2, D.1.3, ~~D.1.5~~, and D.1.7, and pursuant to 326 IAC 2-7-5(9), the Permittee shall maintain the following records:
- (1) The total VOC usage for each quarter, including coatings, dilution solvents, and clean-up solvents;
 - (2) A log of all times when the thermal oxidizer is in operation and the corresponding temperature data;
 - (3) A log of the date and time that each application/batch begins and ends, **and the beginning and ending times of any interruptions during a batch**;
 - (4) The VOC content of each coating material and dilution solvent used in each application/batch run.
 - (5) The amount of coating material and dilution solvent less water used on a daily basis, **as needed to demonstrate compliance with D.1.13**. Records shall be kept of cleanup solvent usage on a monthly basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (6) Records which shall be taken daily or monthly, as specified below, and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.1.2, D.1.3, ~~D.1.5~~, and D.1.7.
 - (A) For each calendar month, the volume-weighted average mass of VOC emitted to the atmosphere (N) and the calculated emission limit (S), as described in 40 CFR 60.463(c)(4);
 - (B) For days when the thermal oxidizer is used intermittently or not used at all, records shall be kept of the daily volume weighted average VOC content of each coating and solvent used, in pounds of VOC per gallon of coating, excluding water **or pounds of VOC per gallon of coating solids**.
 - (C) The weight of VOCs emitted for each month.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.157 NESHAP - Surface Coating of Metal Coil – Reporting Requirements [40 CFR 63 Subpart SSSS]
Pursuant to 40 CFR 63.5180, the Permittee shall submit reports as specified below.

- (a) The Permittee must submit a Notification of Performance Test as specified in 40 CFR 63.7 and 63.9(e) if the Permittee is complying with the emission standard using a control device. This notification and the site-specific test plan required under 40 CFR 63.7(c)(2)

must identify the operating parameter to be monitored to ensure that the capture efficiency measured during the performance test is maintained. The Permittee may consider the operating parameter identified in the site-specific test plan to be approved unless explicitly disapproved, or unless comments received from the Administrator require monitoring of an alternate parameter.

- (b) The Permittee must submit a Notification of Compliance Status as specified in 40 CFR 63.9(h). The Permittee must submit the Notification of Compliance Status no later than 30 calendar days following the end of the initial 12-month compliance period described in 40 CFR 63.5130.
- (c) The Permittee must submit performance test reports as specified in 40 CFR 63.10(d)(2) if the Permittee is using a control device to comply with the emission standards and has not obtained a waiver from the performance test requirement.
- (d) The Permittee must submit start-up, shutdown, and malfunction reports as specified in 40 CFR 63.10(d)(5) if the Permittee use a control device to comply with this subpart.
 - (1) If the Permittee's actions during a start-up, shutdown, or malfunction of an affected source (including actions taken to correct a malfunction) are not completely consistent with the procedures specified in the source's start-up, shutdown, and malfunction plan specified in 40 CFR 63.6(e)(3), the Permittee must state such information in the report. The start-up, shutdown, or malfunction report will consist of a letter containing the name, title, and signature of the responsible official who is certifying its accuracy, that will be submitted to the Administrator.
 - (2) Separate start-up, shutdown, or malfunction reports are not required if the information is included in the report specified in 40 CFR 63.5180 (g).
- (e) The Permittee must submit semi-annual compliance reports containing the information specified in 40 CFR 63.5180 (g)(1) and (2).
 - (1) Compliance report dates.
 - (i) The first **semiannual compliance reporting period begins 1 day after the end of the initial compliance period described in 40 CFR 63.5130(d) that applies to the affected source and ends 6 months later.** ~~must cover the period beginning on the compliance date that is specified for the affected source in 40 CFR 63.5130(a) and ending on June 30 or December 31, whichever date is the first date following the end of the first calendar half after the compliance date that is specified for the source in 40 CFR 63.5130(a).~~
 - (ii) The first compliance report must be postmarked or delivered no later than ~~July 31 or January 31, whichever date follows the end of the first calendar half after the compliance date that is specified for the affected source in 40 CFR 63.5130(a)~~ **thirty (30) days after the reporting period ends.**

- (iii) Each subsequent compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31.
 - (iv) Each subsequent compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period.
 - (v) For each affected source that is subject to permitting regulations pursuant to 40 CFR part 70 or part 71, and the permitting authority has established dates for submitting semiannual reports pursuant to 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), the Permittee may submit the first and subsequent compliance reports according to the dates the permitting authority has established instead of according to the dates in 40 CFR 63.5180 (g)(1)(i) through (iv).
- (2) The semi-annual compliance report must contain the following information:
- (i) Company name and address.
 - (ii) Statement by a responsible official with that official's name, title, and signature, certifying the accuracy of the content of the report.
 - (iii) Date of report and beginning and ending dates of the reporting period. The reporting period is the 6-month period ending on June 30 or December 31. Note that the information reported for each of the 6 months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation.
 - (iv) Identification of the compliance option or options specified in Table 1 to 40 CFR 63.5170 that the Permittee used on each coating operation during the reporting period. If the Permittee switched between compliance options during the reporting period, the Permittee must report the beginning dates the Permittee used each option.
 - (v) A statement that there were no deviations from the standards during the reporting period, and that no CEMS were inoperative, inactive, malfunctioning, out-of-control, repaired, or adjusted.
- (f) The Permittee must submit, for each deviation occurring at an affected source where the Permittee is not using CEMS to comply with the standards in this subpart, the semi-annual compliance report containing the information in 40 CFR 63.5180 (f)(2)(i) through (iv) and the information in 40 CFR 63.5180 (g)(1) through (3) including the following:
- (1) The total operating time of each affected source during the reporting period.
 - (2) Information on the number, duration, and cause of deviations (including unknown cause, if applicable) as applicable, and the corrective action taken.

- (3) Information on the number, duration, and cause for monitor downtime incidents (including unknown cause other than downtime associated with zero and span and other daily calibration checks, if applicable).

D.1.168 Reporting Requirements

A summary of the following information shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the period being reported:

- (a) Information to document compliance with Condition D.1.34 shall be submitted quarterly.
- (b) Pursuant to 40 CFR 60.465(c), the owner or operator shall submit a calendar quarter written report of each instance in which the monthly volume-weighted average of the local mass of VOC emitted to the atmosphere (N) is greater than the emission limit (S), as calculated pursuant 40 CFR 60.463(c)(4). If no such instances have occurred during a particular quarter, a report stating this shall be submitted semiannually.

The reports submitted by the Permittee require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Part 70 Operating Permit

Source Background and Description

Source Name: EDCOAT Limited Partnership
Source Location: 30350 Edison Road New Carlisle, IN 46552
County: St. Joseph
SIC Code: 3479
Operation Permit No.: T 141-10725-00102
Permit Reviewer: Nisha Sizemore

The Office of Air Quality (OAQ) has reviewed a Part 70 permit application from EDCOAT Limited Partnership relating to the operation of a roll coil coating plant. This Part 70 permit contains provisions intended to satisfy the requirements of the construction permit rules.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (a) A roll coil prime coating application system, consisting of a roll coater, flow out section, and flash off section, including a natural gas fired bake oven, constructed in June 1996, with a maximum capacity of 60,000 pounds per hour, using the thermal oxidizer as control, and exhausting to stack SV-14
- (b) A roll coil top coating application system, consisting of a roll coater, flow out section, and flash off section, including a natural gas fired bake oven, constructed in June 1996, with a maximum capacity of 60,000 pounds per hour, using the thermal oxidizer as control, and exhausting to stack SV-14

The following process burners serve the bake ovens in the coating application systems:

- (1) Six model 4988R-2500 natural gas fired process burners, each rated at 2.5 million Btu per hour, constructed in June 1996
- (2) Four model 4988R-4000 natural gas fired process burners, each rated at 4.0 million Btu per hour, constructed in June 1996
- (3) Four model 4988R-6000 natural gas fired process burners, each rated at 6.0 million Btu per hour, constructed in June 1996

Note: The prime and top coating systems operate in sequence to produce an end product. No intermediate products within the activity/process serve as end products.

- (c) A natural gas fired thermal oxidizer that controls emissions from the paint line, coating rooms, ovens, paint storage, and mixing area, rated at 30 million Btu per hour, constructed in June 1996, and exhausting to stack SV-14.

Unpermitted Emission Units and Pollution Control Equipment

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

Insignificant Activities

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million Btu per hour:
 - (1) Four natural gas fired unit heaters, each rated at 0.3 million Btu per hour, constructed in March 1998;
 - (2) Three natural gas fired room heaters, each rated at 4.86 million Btu per hour, constructed in March 1998;
 - (3) Four natural gas fired make-up air units, each rated at 3.78 million Btu per hour, constructed in March 1998;
- (b) Combustion source flame safety purging on startup;
- (c) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids;
- (d) Refractory storage not requiring air pollution control equipment;
- (e) Degreasing operations (Safety-Kleene) that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6;
- (f) Cleaners and solvents characterized as follows:
 - (1) having a vapor pressure equal to or less than 2 kPa; 15mm Hg; or 0.3 psi measured at 38 degrees C, or;
 - (2) having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20 degrees C;the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months;
- (g) Closed loop heating and cooling systems;
- (h) Infrared cure equipment;
- (i) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume;
- (j) Natural draft cooling towers not regulated under a NESHAP;
- (k) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone;
- (l) Paved and unpaved roads and parking lots with public access; [326 IAC 6-4]
- (m) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process;

- (n) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower;
- (o) Purge double block and bleed valves; and
- (p) A laboratory as defined in 326 IAC 2-7-1(20)(C).

Existing Approvals

The source has constructed or has been operating under the following previous approvals:

CP 141-4731-00102, issued on March 7, 1996 and associated Operation Permit Validation, issued on April 15, 1998

All conditions from previous approval CP 141-4731-00102, issued on March 7, 1996 were incorporated into this Part 70 permit except those listed below. The following terms and conditions from previous approvals have been determined no longer application; therefore were not incorporated into this Part 70 permit.

- (a) Operation Condition # 3: "That the equipment shall be operated and maintained in accordance with the manufacturer's specifications."

Reason not incorporated:

Edcoat has stated that they never had the manufacturer's instructions or specifications for this equipment. The system was purchased as used equipment and the manufacturer is out of business. Edcoat has developed their own operating procedures for the equipment.

- (b) Operation Condition #6: "That pursuant to 326 IAC 8-2-4 (Coil Coating Operations), no owner or operator of a coil coating line subject to this section may cause, allow or permit the discharge into the atmosphere of any volatile organic compounds in excess of 2.6 pounds per gallon excluding water, delivered to the coating applicator from prime and topcoat or single coat operations. Compliance shall be achieved utilizing the compliance method of thermal oxidation specified in 326 IAC 8-1-2. A daily volume-weighted average of all coatings applied in a coating line or printing line subject to the requirements of 326 IAC 8-2 or 326 IAC 8-5-5 shall be maintained and made available upon request. Records of daily usage of gallons of solids coating and VOC content of each coating or ink solvent shall be maintained and made available upon request. Also, records of daily emissions in pounds VOC shall be maintained and made available upon request. If daily records sufficient to determine accurate daily weighted averages are not available, each coating or ink solvent shall meet the requirements of the applicable section."

Reason not incorporated:

The applicant has requested the flexibility to follow an alternative operating scenario with low VOC coatings which are compliant with 326 IAC 8-2-4 (Coil Coating Operations) without operating the thermal oxidizer. Therefore, this proposed Part 70 permit will require compliance with 326 IAC 8-2-4 by either the use of the thermal oxidizer or the use of low (less than 2.6 pounds VOC/gal of coating less water) VOC coatings. Records of daily volume weighted averages will need to be maintained for only those coatings which are used during times when the thermal oxidizer is not operated to achieve compliance with 326 IAC 8-2-4. When the thermal oxidizer is operated to achieve the 2.6 lb VOC/gal of coating less water limit, all coatings will comply with the limit, so that daily volume weighted averaging will not be necessary.

Additionally, the source does not contain any printing lines, so 326 IAC 8-5-5 is not applicable.

- (c) Operation Condition #8: That the thermal incinerator shall operate properly at all times that the roll coil coating applications systems are operated and cleaned. When operating the coil coating application system, the thermal incinerator shall maintain a minimum operating temperature of 1400°F or a temperature determined in the compliance tests (described in operation Condition 5) to maintain a minimum 90% destruction of the volatile organic compounds (VOC) captured. The thermal oxidizer chamber temperature shall be continuously monitored and recorded to demonstrate compliance with 326 IAC 8-2-4 and 40 CFR 60.464 and 40 CFR 40.465 (copy enclosed). Operation of the coil coating application system shall cease if the thermal oxidizer temperature is less than the minimum operating temperature determined in the compliance test.

Reason not incorporated:

The applicant has requested the flexibility to follow an alternative operating scenario with low VOC coatings which are compliant with 326 IAC 8-2-4 (Coil Coating Operations) without operating the thermal oxidizer. Therefore, this proposed Part 70 permit will require compliance with 326 IAC 8-2-4 by either the use of the thermal oxidizer or the use of low (less than 2.6 pounds VOC/gal of coating less water) VOC coatings. The Permittee will be required to continuously monitor the thermal oxidizer temperature at all times when the thermal oxidizer is being used to demonstrate compliance with 326 IAC 8-2-4, 40 CFR 60.464, or 40 CFR 63.1520.

- (d) Operation Condition #9: "That the input VOC of coatings applied and solvents applied to the coil coating application systems shall be limited to 200 tons per month. This throughput limitation is equivalent to VOC emissions of 240 tons per year after control with the thermal oxidizer operating at an overall efficiency of 90%. Therefore, the Prevention of Significant Deterioration (PSD) rules, 326 IAC 2-2 and 40 CR 52.21, will not apply."

Reason not incorporated:

The source has a maximum input capacity of 1736 tons of VOC per year and the potential to emit 1736 tons of VOC per year. Compliance with 40 CFR 60.462 (Subpart TT), which requires 90% emission reduction for the thermal oxidizer, would control emissions to 174 tons of VOC/year. The source conducted a stack test in 1998 on the thermal oxidizer and demonstrated compliance with an overall control efficiency of 94.5%.

Combustion units have the potential to emit 2.8 tons of VOC per year.

The source has requested the flexibility to follow an alternative operating scenario with low VOC coatings which are compliant with 40 CFR 60, Subpart TT (NSPS for Metal Coil Surface Coating) and 326 IAC 8-2-4 (Coil Coating Operations) without operating the thermal oxidizer. When such compliant coatings (i.e. those containing 2.34 pounds of VOC per gallon of solids pursuant to NSPS Subpart TT, and 2.6 pounds of VOC per gallon of coating less water

pursuant to 326 IAC 8-2-4) are used, the coil coating operation has the potential to emit 1032 tons of VOC per year, which would make PSD rules applicable.

Therefore, input VOC shall be limited such that 5.5% of all VOC input during operation of the thermal oxidizer at optimum operating conditions plus 100% of all VOC input during times when the thermal oxidizer is not operating at optimum operating conditions shall be limited to less than 247 tons per year, so that PSD is not applicable. Should input VOC exceed the above limits, 326 IAC 2-2 and 40 CFR 52.21 would become applicable.

- (e) All construction conditions from previously issued permits.

Reason not incorporated: All facilities previously permitted have already been constructed; therefore, the construction conditions are no longer necessary as part of the operating permit. Any facilities that were previously permitted but have not yet been constructed would need new pre-construction approval prior to beginning construction.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 permit application for the purposes of this review was received on March 10, 1999. Additional information was received on August 2, August 30, September 1, September 4, October 2, 2000, and October 18, 2002.

Emission Calculations

Calculations are included in Appendix A of this document (3 pages).

Potential To Emit

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

Levels below represent emissions before controls or enforceable limits

Pollutant	Potential To Emit (tons/year)
PM	less than 100
PM-10	less than 100
SO ₂	less than 100
VOC	greater than 250
CO	less than 100
NO _x	less than 100

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

HAP's	Potential To Emit (tons/year)
Ethylene glycol	greater than 10
Toluene	greater than 10
Isophorone	less than 10
Xylene	less than 10
TOTAL	greater than 25

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) VOC is equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) a combination of HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (c) Fugitive Emissions
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2000 OAQ emission data from the source.

Pollutant	Actual Emissions (tons/year)
PM	0
PM-10	0
SO ₂	0
VOC	26
CO	10
NO _x	12
HAP	not available

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 operating permit.

Process/Facility	Potential to Emit (tons/year)					
	PM	PM-10	SO ₂	VOC	CO	NO _x
Significant and Insignificant Combustion; total = 101.3 MMBtu/hr	0.8	3.4	0.3	2.1	37.3	44.4
Roll Coil Coating	-	-	-	247	-	-
Total Source	0.8	3.4	0.3	< 250	37.3	44.4

“-“ = not calculated, negligible

County Attainment Status

The source is located in St. Joseph County.

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

Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. St. Joseph County has been designated as maintenance attainment for ozone.

Federal Rule Applicability

- (a) The roll coil prime and top coating application process is subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.460 - 60.466, Subpart TT) because it meets the definition of a metal coil surface coating operation in 40 CFR 60.461 and commenced construction after January 5, 1981.

Pursuant to 326 IAC 12 and 40 CFR 60.462(a)(4), the metal coil coating process shall not discharge into the air in excess of a value between 0.14 (or a 90% VOC emission reduction) and 0.28 kg VOC/l of coating solids applied for each calendar month. The definition of “month” as defined in 40 CFR 63.5110 shall apply to this limit as long as the Permittee predefines “month” in such a way that there is at least one 5-week month in each calendar quarter.

Based on the MSDS submitted by the source, stack tests results, and calculations made, the roll coil coating process is in compliance with these requirements. The source is permitted to use low VOC content coatings as defined by the rule, or use the thermal oxidizer to control emissions to the levels required by the rule.

- (b) The roll coil prime and top coating application process is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for metal coil coating operations, 40 CFR 63, Subpart SSSS because it meets the definition of a coil coating line in 40 CFR 63.5110 and is located at a source that is a major source of HAPs.

General Provisions

On and after June 14, 2002, the provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 20-1, apply to the coil coating lines described in this section except when otherwise specified in 40 CFR Part 63, Subpart SSSS.

Emission Limits and Standards

On and after June 10, 2005, each coil coating line must limit organic HAP emissions to the following level specified:

- (1) No more than 2 percent of the organic HAP applied for each month during each 12-month compliance period (98 percent reduction); or
- (2) No more than 0.046 kilogram (kg) of organic HAP per liter of solids applied during each 12-month compliance period; or
- (3) If an oxidizer is used to control organic HAP emissions, the oxidizer must be operated such that an outlet organic HAP concentration of no greater than 20 parts per million by volume (ppmv) on a dry basis is achieved and the efficiency of the capture system is 100 percent.

Compliance Determination Requirements

On and after June 10, 2005, each coil coating line must comply with the following requirements:

- (a) If the thermal oxidizer is used to demonstrate compliance with the emission limits established in 40 CFR 63.5120 and Condition D.1.5, the average combustion temperature in any 3-hour period must not fall below the combustion temperature limit established according to 40 CFR 63.5160(d)(3)(i).
- (b) Each capture system and control device used to demonstrate compliance with the emission limits established in 40 CFR 63.5120 and Condition D.1.5 shall be monitored and inspected following the date on which the initial performance test of the capture and control system is completed. The following monitoring equipment must be installed and operated.
 - (1) If the control device is used intermittently, the Permittee must comply with at least one of the following requirements for each curing oven associated with the intermittently controlled work stations.
 - (A) A flow position control indicator that provides a record indicating whether the exhaust stream from the curing oven is directed to the control device or is diverted from the control device, shall be installed, calibrated, maintained, and operated according to the manufacturer's specifications. The time and flow control position must be recorded at least once per hour, as well as every time the flow direction is changed. The flow control position indicator must be installed at the entrance to any bypass line that could divert the exhaust stream away from the control device to the atmosphere.
 - (B) Any bypass line valve shall be secured in the closed position

with a car-seal or a lock-and-key type configuration when the control device is in operation. A visual inspection of the seal or closure mechanism will be performed at least once every month to ensure that the valve or damper is maintained in the closed position, and the exhaust stream is not diverted through the bypass line.

- (C) The valve position shall be continuously monitored when the control device is in operation to ensure that any bypass line valve or damper is in the closed position. The monitoring system must be inspected at least once every month to verify that the monitor will indicate valve position.
 - (D) An automatic shutdown system shall be used in which the coil coating line is stopped when flow is diverted away from the control device to any bypass line when the control device is in operation. The automatic shutdown system must be inspected at least once every month to verify that it will detect diversions of flow and shut down operations.
- (2) If the Permittee is complying with the requirements of the standards in 40 CFR 63.5120 through the use of an oxidizer and demonstrating continuous compliance through monitoring of an oxidizer operating parameter, the Permittee must comply with the following.
- (A) Install, calibrate, maintain, and operation temperature monitoring equipment according to manufacturer's specifications. The calibration of the chart recorder, data logger, or temperature indicator must be verified every 3 months; or the chart recorder, data logger, or temperature indicator must be replaced. The equipment must be replaced either if the calibration is not performed or the equipment cannot be calibrated properly. Each temperature monitoring device must be equipped with a continuous recorder. The device must have an accuracy of plus or minus 1 percent of the temperature being monitored in degrees Celsius, or plus or minus 1 degree Celsius, whichever is greater.
 - (B) For the thermal oxidizers, to demonstrate compliance with the operating limit established according to 40 CFR 63.5160(d)(3)(i), a thermocouple or temperature sensor shall be installed in the combustion chamber at a location in the combustion zone.
 - (C) If a control device is used to comply with the standards in 40 CFR 63.5120, the Permittee shall develop a capture system monitoring plan containing the information specified below. The monitoring plan must be made available for inspection by IDEM, OAQ upon request.
 - (I) The monitoring plan must identify the operating parameter to be monitored to ensure that the capture efficiency measure during the initial compliance test is

maintained, explain why this parameter is appropriate for demonstrating ongoing compliance, and identify the specific monitoring procedures.

- (II) The plan must also specify operating limits at the capture system operating parameter value, or range of values, that demonstrates compliance with the standards in 40 CFR 63.5120. The operating limits must represent the conditions indicative of proper operation and maintenance of the capture system.
- (III) The Permittee must conduct monitoring in accordance with the plan.

Any deviation from the required operating parameters in 40 CFR 63.5150(a)(3) and (4) will be considered a deviation from the operating limit, unless otherwise excused.

Testing

Pursuant to 40 CFR 63, Subpart SSSS, the Permittee shall perform the testing to measure the organic HAP content of each coating, the solids content of each coating, and the control device destruction or removal efficiency, as specified in 40 CFR 63.5160 (b), (c), and (d) in order to demonstrate compliance with the limits established in 40 CFR 63.5120 and Condition D.1.5 of this permit.

Monitoring

When the roll coil coating process is operated with the thermal oxidizer at an average hourly temperature of 1312°F, or the latest tested temperature, to achieve a reduction efficiency, R, of 94.5 % or the latest tested R:

- (1) The thermal oxidizer chamber temperature shall be continuously monitored and recorded to demonstrate compliance with 326 IAC 2-2, 326 IAC 8-2-4, 40 CFR 60.464, and 40 CFR 60.465. The temperature measurements shall be reduced to 1-hour block averages.
- (2) The thermal oxidizer shall have an accuracy of +/- 1°C or +/- 0.75 percent of the temperature being measured expressed in degrees Celsius, whichever is greater.

Note: The NESHAP at 40 CFR 63.5150(a)(3)(i) requires an accuracy of +/- 1°C or +/- 1 percent of the temperature being measured. The NSPS requires +/- 2.5 °C or +/- 0.75 percent of the temperature being measured. In order to streamline the requirements, Edcoat has requested to have one permit condition requiring the more stringent of both rules, or +/- 1°C or +/- 0.75 percent of the temperature being measured.

- (3) Pursuant to 40 CFR 63.5120(a)(3), the capture system (i.e. the coating rooms) for the metal coil coating operation shall achieve total permanent enclosure.
- (4) Duct flow rate shall be maintained within a range established in the most recent compliance test to achieve the tested emission reduction. Duct flow rate shall be observed at least once per week after the appropriate duct flow rate has been established through an approved compliance test.

The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports, shall be considered a violation of this permit.

Record Keeping

Pursuant to 40 CFR 63.5190, the Permittee shall maintain the records as specified below.

- (a) Pursuant to 40 CFR 63.5190, the Permittee shall maintain the records of the coating lines on which the Permittee used each compliance option and the time periods (beginning and ending dates and times) the Permittee used each option.
- (b) Pursuant to 40 CFR 63.5190, the Permittee shall maintain the records specified in 40 CFR 63.10(b)(2) of all measurements needed to demonstrate compliance with 40 CFR 63, Subpart SSSS, including:
 - (1) control device and capture system operating parameter data in accordance with 40 CFR 63.5150(a)(1), (3), and (4);
 - (2) organic HAP content data for the purpose of demonstrating compliance in accordance with 40 CFR 63.5160(a);
 - (3) volatile matter and solids content data for the purpose of demonstrating compliance in accordance with 40 CFR 63.5160(c);
 - (4) overall control efficiency determination or alternative outlet HAP concentration using capture efficiency tests and control device destruction or removal efficiency tests in accordance with 40 CFR 63.5160(d), (e), and (f); and
 - (5) material usage HAP usage, volatile matter usage, and solids usage and compliance demonstrations using these data in accordance with 40 CFR 63.5170(a), (b), and (d).
- (c) Pursuant to 40 CFR 63.5190, the Permittee shall maintain the records specified in 40 CFR 63.10(b)(3).
- (d) Pursuant to 40 CFR 63.5190, the Permittee shall maintain the records of all liquid-liquid material balances that are performed in accordance with the requirements of 40 CFR 63.5170.

Reporting

Pursuant to 40 CFR 63.5180, the Permittee shall submit reports as specified below.

- (a) The Permittee must submit an initial notification required in 40 CFR 63.9(b).
 - (1) Submit an initial notification for an existing source no later than 2 years after June 10, 2002.
 - (2) Submit an initial notification for a new or reconstructed source as required by 40 CFR 63.9(b).
- (b) The Permittee must submit a Notification of Performance Test as specified in 40 CFR 63.7 and 63.9(e) if the Permittee is complying with the emission standard

using a control device. This notification and the site-specific test plan required under 40 CFR 63.7(c)(2) must identify the operating parameter to be monitored to ensure that the capture efficiency measured during the performance test is maintained. The Permittee may consider the operating parameter identified in the site-specific test plan to be approved unless explicitly disapproved, or unless comments received from the Administrator require monitoring of an alternate parameter.

- (c) The Permittee must submit a Notification of Compliance Status as specified in 40 CFR 63.9(h). The Permittee must submit the Notification of Compliance Status no later than 30 calendar days following the end of the initial 12-month compliance period described in 40 CFR 63.5130.
- (d) The Permittee must submit performance test reports as specified in 40 CFR 63.10(d)(2) if the Permittee is using a control device to comply with the emission standards and has not obtained a waiver from the performance test requirement.
- (e) The Permittee must submit start-up, shutdown, and malfunction reports as specified in 40 CFR 63.10(d)(5) if the Permittee use a control device to comply with this subpart.
 - (1) If the Permittee's actions during a start-up, shutdown, or malfunction of an affected source (including actions taken to correct a malfunction) are not completely consistent with the procedures specified in the source's start-up, shutdown, and malfunction plan specified in 40 CFR 63.6(e)(3), the Permittee must state such information in the report. The start-up, shutdown, or malfunction report will consist of a letter containing the name, title, and signature of the responsible official who is certifying its accuracy, that will be submitted to the Administrator.
 - (2) Separate start-up, shutdown, or malfunction reports are not required if the information is included in the report specified in 40 CFR 63.5180 (g).
- (f) The Permittee must submit semi-annual compliance reports containing the information specified in 40 CFR 63.5180 (g)(1) and (2).
 - (1) Compliance report dates.
 - (i) The first compliance report must cover the period beginning on the compliance date that is specified for the affected source in 40 CFR 63.5130(a) and ending on June 30 or December 31, whichever date is the first date following the end of the first calendar half after the compliance date that is specified for the source in 40 CFR 63.5130(a).
 - (ii) The first compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date follows the end of the first calendar half after the compliance date that is

specified for the affected source in 40 CFR 63.5130(a).

- (iii) Each subsequent compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31.
 - (iv) Each subsequent compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period.
 - (v) For each affected source that is subject to permitting regulations pursuant to 40 CFR part 70 or part 71, and the permitting authority has established dates for submitting semiannual reports pursuant to 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), the Permittee may submit the first and subsequent compliance reports according to the dates the permitting authority has established instead of according to the dates in 40 CFR 63.5180 (g)(1)(i) through (iv).
- (2) The semi-annual compliance report must contain the following information:
- (i) Company name and address.
 - (ii) Statement by a responsible official with that official's name, title, and signature, certifying the accuracy of the content of the report.
 - (iii) Date of report and beginning and ending dates of the reporting period. The reporting period is the 6-month period ending on June 30 or December 31. Note that the information reported for each of the 6 months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation.
 - (iv) Identification of the compliance option or options specified in Table 1 to 40 CFR 63.5170 that the Permittee used on each coating operation during the reporting period. If the Permittee switched between compliance options during the reporting period, the Permittee must report the beginning dates the Permittee used each option.
 - (v) A statement that there were no deviations from the standards during the reporting period, and that no CEMS were inoperative, inactive, malfunctioning, out-of-control, repaired, or adjusted.
- (g) The Permittee must submit, for each deviation occurring at an affected source where the Permittee is not using CEMS to comply with the standards in this

subpart, the semi-annual compliance report containing the information in 40 CFR 63.5180 (f)(2)(i) through (iv) and the information in 40 CFR 63.5180 (g)(1) through (3) including the following:

- (1) The total operating time of each affected source during the reporting period.
 - (2) Information on the number, duration, and cause of deviations (including unknown cause, if applicable) as applicable, and the corrective action taken.
 - (3) Information on the number, duration, and cause for monitor downtime incidents (including unknown cause other than downtime associated with zero and span and other daily calibration checks, if applicable).
- (c) Pursuant to 40 CFR 64, the roll coil prime and top coating application process is classified as a Pollution Specific Emission Unit (PSEU) for VOC, and therefore would be subject to Compliance Assurance Monitoring (CAM), due to the unit's potential to emit (PTE), prior to controls, greater than 100 tons of VOC per year, and due to the use of a control device to meet applicable pre-Nov. 15, 1990 proposed (40 CFR 60.460 - 60.466, Subpart TT) requirements. However, compliance with the requirements of 40 CFR 63, Subpart SSSS satisfies the requirements of 40 CFR 64.3 (Compliance Assurance Monitoring (CAM))
- The roll coil prime and top coating application process is classified as a Large PSEU for VOC, due to the unit's PTE after controls greater than 100 tons of VOC per year, and the Part 70 application was submitted after April 20, 1998. Therefore, the source is potentially subject to CAM. However, compliance with the requirements of 40 CFR 63, Subpart SSSS satisfies the requirements of 40 CFR 64.3 (Compliance Assurance Monitoring (CAM))
- (d) The Safety-Kleene degreaser is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) 40 CFR 63.460, Subpart T because the solvents used do not contain specified halogenated HAP solvents greater than 5 percent by weight.

State Rule Applicability - Entire Source

326 IAC 1-6-3 (Preventive Maintenance Plan)

The source submitted a Preventive Maintenance Plan (PMP) on Jan. 19, 1998. This PMP has been verified to fulfill all of the requirements of 326 IAC 1-6-3 (Preventive Maintenance Plan) except for 326 IAC 1-6-3(a)(1): Identification of the individuals(s) responsible for inspecting, maintaining and repairing emission control devices. Pursuant to 326 IAC 1-6-3 and CP-141-4731-00102, the source shall submit information to fulfill 326 IAC 1-6-3(a)(1).

326 IAC 2-2 [40 CFR 52.21] (PSD - Prevention of Significant Deterioration)

This source is considered a minor source under the PSD rules because the Permittee has accepted conditions limiting the potential to emit VOC to less than 250 tons per year and it is not

one of the 28 listed source categories.

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

Pursuant to 326 IAC 2-4.1-1, the source is a major source of HAPs due to its potential to emit 10 tons per year of any HAP and 25 tons per year of any combination of HAP. However, since the source received all necessary permits for construction prior to July 27, 1997, 326 IAC 2-4.1-1 does not apply. Additionally, since the source is subject to the requirements of 40 CFR 63, Subpart SSSS, the New Source Toxics Control rule 326 IAC 2-4.1-1 does not apply.

326 IAC 2-6 (Emission Reporting)

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

326 IAC 5-1 (Opacity Limitations)

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

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

326 IAC 8-6 (Organic Solvent Emission Limitations)

The source is not subject to 326 IAC 8-6 because it did not commence operation between Oct. 7, 1974 and December 31, 1979

State Rule Applicability - Individual Facilities

326 IAC 8-2-4 (Coil Coating Operations)

The coil coating operation is subject to the requirements of 326 IAC 8-2-4 because it was constructed after January 1, 1980 and has the potential to emit greater than 25 tons per year of VOC. Pursuant to 326 IAC 8-2-4 (Coil Coating Operations), and CP 141-4731-00102 issued March 7, 1996, the owner or operator of the coil coating operation may not cause, allow or permit the discharge into the atmosphere any VOC in excess of 2.6 pounds per gallon, excluding water, delivered to the applicator.

When operating the thermal oxidizer to achieve the limit for rule 326 IAC 8-2-4, the thermal oxidizer shall operate properly and maintain an average hourly operating temperature of 1312 °F, or the most recently tested temperature to achieve a reduction efficiency, R, of 94.5%, or the most recently tested R. Operating the thermal oxidizer at an average hourly temperature of 1312 °F or higher for an entire day to demonstrate a reduction efficiency of 94.5% while using coatings less than 6.82 pounds per gallon of coating less water, will demonstrate compliance

with the requirements of 326 IAC 8-2-4 and Condition D.1.7 for that day.

For days when the thermal oxidizer is used intermittently during the day, or not used at all during the day, the achievement of the limit shall be based on the following equation:

$$A = [3 (C * U) / 3 U]_{NT} + [(100\% - R) [3 (C * U) / 3 U]_T] \# 2.6 \text{ lb VOC/gal}$$

A = Daily volume weighted average in pounds VOC per gallon

C = VOC content of coating in pounds VOC per gallon

U = usage rate of coating in gallons per day

R = 94.5 %, or the latest tested reduction efficiency

NT refers to applications during which the oxidizer is not operated at or above an average hourly temperature of 1312°F, or the latest tested temperature

T refers to applications during which the oxidizer is operated at or above an average hourly temperature of 1312°F, or the latest tested temperature.

The VOC content and usages used to demonstrate compliance with the limits contained in Condition D.1.7 shall be determined by preparing or obtaining from the manufacturer the copies of the “as supplied” and “as applied” VOC data sheets, and following procedures for determining monthly volume-weighted average emissions as described in 40 CFR 60.463(c)(4) and daily-weighted average emissions described in 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a). IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Based on the MSDS submitted by the source, stack test results, and calculations made, the roll coil coating process is in compliance with these requirements. The source is in the process of installing an anubar to measure duct pressure. Based on the coating information submitted with the application, the operation of the thermal oxidizer at 90% emission efficiency will result in VOC emissions not greater than 2.6 pounds of VOC per gallon of coating less water from any coating. The volume weighted average of a low VOC coating process, as described on page 2 of the Appendix, shows VOC emissions not greater than 2.6 pounds of VOC per gallon of coating less water:

$$A = [3 C \times U] / 3 U$$

Where: A is the volume weighted average in pounds VOC per gallon
C is the VOC content of the coating in pounds VOC per gallon
U is the usage rate of the coating in gallons per unit of time

$$A = 1.81 \text{ lb VOC/gal. of coating less water}$$

326 IAC 8-3 (Organic Solvent Degreasing Operations)

The insignificant Safety-Kleene degreaser is not subject to 326 IAC 8-3, because it does not perform organic solvent degreasing operations.

Testing Requirements

- (a) An anubar, or similar device to measure duct pressure, shall be installed within the thermal oxidizer, and a range that will achieve optimum VOC destruction will be established.
- (b) Pursuant to 40 CFR 60.463, following the initial performance test, the source shall conduct monthly performance testing to calculate overall reduction efficiency. The reduction efficiency determined from the most recent performance test may be used for monthly testing, providing the control device and capture system operating conditions have not changed. The procedure described in 40 CFR 60.463 (c)(2)(i)(A), (B), and (C) shall be repeated when directed by the Administrator or when the source operates the control device or capture system at conditions different from the initial performance test.
- (c) Within 30 months after the initial compliance tests, which were conducted Aug. 31 and Sept. 1, 1998, the Permittee shall perform compliance tests for VOC emissions, destruction efficiency, and overall reduction efficiency, according to 326 IAC 3-6, using the methods specified in the rules or as approved by the Commissioner. The tests shall determine a duct pressure range which achieves optimum VOC destruction. The tests shall also demonstrate compliance with the following criteria for permanent total enclosure of the thermal oxidizer:
 - (1) Any Natural Draft Opening (NDO) shall be at least four equivalent opening diameters from each VOC emitting point. NDO is any permanent opening in the enclosure which remains open during the operation of the facility and is not connected to a duct in which a fan is installed.
 - (2) The total area of all NDO's shall not exceed five percent of the surface area of the enclosure's four walls, floor, and ceiling.
 - (3) The average facial velocity (FV) of air through all NDO's shall be at least 3,600 m/hr (200 fpm). The direction of air through all NDO's shall be into the enclosure.
 - (4) All access doors and windows whose areas are not included in condition (2) and are not included in the calculation of condition (3) shall be closed during routine operation of the process.
 - (5) All VOC emissions must be captured and contained for discharge through a control device
- (d) Pursuant to 40 CFR 63, Subpart SSSS, the Permittee shall perform the testing to measure the organic HAP content of each coating, the solids content of each coating, and the control device destruction or removal efficiency, as specified in 40 CFR 63.5160 (b), (c), and (d) in order to demonstrate compliance with the limits established in 40 CFR 63.5120 and Condition D.1.5 of this permit.

These tests shall be repeated at least once every 30 months from the date of each valid compliance demonstration.

Compliance Requirements

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

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

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

If the thermal oxidizer is used intermittently or continuously to demonstrate compliance with Conditions D1.2, D.1.3, D.1.5, and D.1.7, the following conditions shall apply:

- (1) The thermal oxidizer chamber temperature shall be continuously monitored and recorded to demonstrate compliance with 326 IAC 2-2, 326 IAC 8-2-4, 40 CFR 60 Subpart TT.
- (2) The thermal oxidizer shall have an accuracy of +/- 2.5°C or +/- 0.75 percent of the temperature being measured expressed in degrees Celsius, whichever is greater.
- (3) The thermal oxidizer shall achieve total permanent enclosure.
- (4) Duct flow rate shall be maintained within a range established in the most recent compliance test to achieve the tested emission reduction. Duct flow rate shall be observed at least once per week after the appropriate duct flow rate has been established through an approved compliance test.

The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports, shall be considered a violation of this permit.

These monitoring conditions are necessary because when using noncompliant coatings, the thermal oxidizer must maintain a minimum operating temperature, capture efficiency, and duct pressure to achieve an overall control efficiency, as determined by the most recent performance

tests, to comply with 326 IAC 12, 326 IAC 8-2-4, 40 CFR 60 Subpart TT, and 40 CFR 63, Subpart SSSS.

Conclusion

The operation of this roll coil coating plant shall be subject to the conditions of the attached proposed Part 70 Permit No. T141-10725-00102.