August 30, 2001

Ms. Amy Deirdorff
Valspar Industries, Incorporated
546 west Abbott Street
Indianapolis, IN 46225

Re: T097-14855-00040
First Minor Permit Modification to
Part 70 No.: T 097-7789-00040

Dear Ms. Dierdorff:

Valspar was issued a permit on August 31, 1999 for the operation of coating manufacturing process. A letter requesting changes to this permit was received on April 19, 2001. Pursuant to the provisions of 326 IAC 2-7-12, a minor permit modification to this permit is hereby approved as described in the attached Technical Support Document.

The modification which consists of the addition of the Latex Paint Manufacturing Line to the facility located at 546 West Abbott Street, Indianapolis, Indiana 46225, with no changes to existing VOC limitations. Listed below are the following changes with bold face reflecting additions and strikeout reflecting deletions.

1) Equipment descriptions in Section A.2 Emissions Units and Pollution Control Equipment Summary have been amended to include Emission Unit ID EU17 as follows:

9) One (1) Latex Paint Production Line, identified as emission unit EU-17, consisting of a 6,000 gallon raw material storage tank, a 8,000 gallon dispersion mixer, and a 4,500 gallon letdown tank. This process will incorporate the use of the following existing tanks: 6,000 gallon raw material storage tank, a 6,000 gallon finished goods tank, and a 8,000 gallon finished goods tank. The water-based paint manufacturing process consists of adding dry ingredients to a dispersion mixer and wetting this product with water and ethylene glycol. The product is then mixed and transferred to the letdown tank were QA/QC checks are performed. The product is transferred to the finished product tanks for transfer to shipping containers. The production line has a maximum capacity rate of 20,000 tons per year of finished product. The initial loading and dispersion step of the process generate PM/PM10 emissions. The PM/PM10 emissions are controlled with a Torit Donaldson model TD-1150-155 pulse jet dust collector identified as DC-17.

2) The additional Emission Unit EU17 has been added to the Emission Unit Description box in Section D.2 FACILITY OPERATION CONDITIONS as follows:

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

(8) Tote paint spray booth, identified as emission unit SB28, is located in building 28. This paint booth is used to coat metal totes. The coating application method is air atomization. Particulate emissions are controlled by a dry filter. Emissions from this unit are exhausted out one stack identified as stack vent SB28-S. This facility was constructed in 1977.

(9) **One (1) Latex Paint Production Line, identified as emission unit EU-17, consisting of a 6,000 gallon raw material storage tank, a 8,000 gallon dispersion mixer, and a 4,500 gallon letdown tank. This process will incorporate the use of the following existing tanks: 6,000 gallon raw material storage tank, a 6,000 gallon finished goods tank, and a 8,000 gallon finished goods tank. The water-based paint manufacturing process consists of adding dry ingredients to a dispersion mixer and wetting this product with water and ethylene glycol. The product is then mixed and transferred to the letdown tank were QA/QC checks are performed. The product is transferred to the finished product tanks for transfer to shipping containers. The production line has a maximum capacity rate of 20,000 tons per year of finished product. The initial loading and dispersion step of the process generate PM/PM10 emissions. The PM/PM10 emissions are controlled with a Torit Donaldson model TD-1150-155 pulse jet dust collector identified as DC-17.**

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

3. Permit conditions in Section D.2 FACILITY OPERATION CONDITIONS are amended as follows to reflect the addition of Emission Unit EU17:

D.2.2 Particulate Emissions [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the Coating Formulation (CF-1 stacks DC1 through 1~~6~~**7**), Brighton Resin Kettle (BRK), Electro-Vapor Resin Kettle (EVRK), ~~and~~ Totes Spray Paint Booth (SB28), **and the Latex Manufacturing (EU-17)** shall not exceed allowable PM emission rate based on the following equation:

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

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

For Coating Formulation (CF-1 stacks DC1 through DC16, P is equal to 1.5 tons per hour and E is equal to 5.38 pounds per hour.

For the Latex manufacturing (DC-17), P is equal to 3.42 tons per hour and E is equal to 9.4 pounds per hour.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Mr. David Foster at (317) 327-2292.

Sincerely,

Original Signed by Vaneeta M. Kumar
Vaneeta M. Kumar, Administrator
Environmental Resources Management Division

Attachments: First Minor Permit Revision F097-14855-00040
Technical Support Document

DSF
cc: Matt Mosier, Compliance, ERMD
U.S. EPA, Region V
Mindy Hahn, IDEM OAM
files

PART 70 OPERATING PERMIT

OFFICE OF AIR QUALITY
and
INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION

Valspar Industries, Incorporated
546 West Abbott Street
Indianapolis, Indiana 46225

Valspar Industries, Incorporated, (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 approval 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.: F097-7789-00040	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management Robert F. Holm, PhD, Administrator Indianapolis Environmental Resources Management Division	Issuance Date: August 31, 1999

First Administrative Amendment: F097-11482-00040	Pages Affected: Title Page, 5, 34 & 36
Robert F. Holm, PhD, Administrator Indianapolis Environmental Resources Management Division	Issuance Date: February 16, 2000

Second Administrative Amendment: F097-13947-00040	Pages Affected: Title Page, 44, 45, 47, 48, 50 & 51
Issued by: Mona A. Salem Chief Operating Officer Department of Public Works City of Indianapolis	Issuance Date: February 16 20,2001

First Minor Permit Modification: F097-14855-00040	Pages Affected: Title Page, 6, 35 & 36
Issued by: Original Signed by Vaneet M. Kumar Vaneeta M. Kumar Administrator Environmental Resources Management Division	Issuance Date: August 30, 2001

The maximum loading rate for each loading station ranges from 10 to 12 gallons per minute. The Coating Formulation and Packaging processes were installed before 1980.

(4) Brighton Resin Kettle, identified as emission unit BRK, is located in building 22. The resin kettle is used to produce primarily alkyd and polyester resins in a batch reactor. This kettle is fired with natural gas and has a maximum rated heat input capacity of 2.7 million Btu per hour. The process emissions from the kettle are vented to a condenser which exhausts out stack BRK-1. Solvents collected by the condenser are routed back to the kettle at a controlled rate in order to control the reaction temperature within the kettle. Particulate emissions generated during the addition of dry ingredients are vent to a scrubber which exhaust out stack BRK-2. Combustion emissions from the 2.7 million Btu per hour burner are not controlled and are exhausted out stack BRK-3. This facility was installed prior to 1965.

(5) Blaw Knox Electro-Vapor Resin Kettle, identified as emission unit EVRK, is located in building 22. The Electro-Vapor Resin Kettle can be operated as a resin kettle used to produce Alkyd resins in a batch operation or as a solvent recovery device used to recover solvents from solvent laden water generated from resin production. The process emissions from resin cooking and solvent recovery operations are vented to a condenser which exhausts out stack EVRK-1. During resin production solvents collected by the condenser are routed back to the kettle at a controlled rate in order to control the reaction temperature within the kettle. The particulate emissions generated from the addition of dry ingredients are vented to a scrubber which exhaust out stack EVRK-2. This facility was installed in prior to 1960.

(6) Industrial Process Steam Kettle, identified as emission unit SK, is located in building 22. The Steam Kettle can be operated as a solvent-recovery device used to recover solvents from solvent-laden water generated from resin production or used for the warm blending of anodic and cathodic acrylic coatings. The emissions from this facility are exhausted out two separate stacks identified as stacks SK-1 and SK-2. The emissions exhausted out stack SK-1 are controlled by a shell-and-tube condenser. This facility was installed prior to 1965.

(7) Four (4) resin thinning tanks, identified as emission unit TT-1 through TT4. The intermediate product from the resin kettles is dropped into a thinning tank that contains solvents used to quench the reaction. Thinning tanks TT-1 and TT-2 are each controlled by a separate condenser which exhausts out stacks TT-1 and TT-2, respectively. Thinning tanks TT-3 and TT-4 are uncontrolled unit and are exhausted out stacks TT-3 and TT-4, respectively. This facility was installed prior to 1980.

(8) Tote paint spray booth, identified as emission unit SB28, is located in building 28. This paint booth is used to coat metal totes. The coating application method is air atomization. Particulate emissions are controlled by a dry filter. Emissions from this unit are exhausted out one stack identified as stack vent SB28-S.

(9) One (1) Latex Paint Production Line, identified as emission unit EU-17, consisting of a 6,000 gallon raw material storage tank, a 8,000 gallon dispersion mixer, and a 4,500 gallon letdown tank. This process will incorporate the use of the following existing tanks: 6,000 gallon raw material storage tank, a 6,000 gallon finished goods tank, and a 8,000 gallon finished goods tank. The water-based paint manufacturing process consists of adding dry ingredients to a dispersion mixer and wetting this product with water and ethylene glycol. The product is then mixed and transferred to the letdown tank were QA/QC checks are performed. The product is transferred to the finished product tanks for transfer to shipping containers. The production line has a maximum capacity rate of 20,000 tons per year of finished product. The initial loading and dispersion step of the process generate PM/PM10 emissions. The PM/PM10 emissions are controlled with a Torit Donaldson model TD-1150-155 pulse jet dust collector identified as DC-17.

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

SECTION D.2 FACILITY OPERATION CONDITIONS

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

(6) Industrial Process Steam Kettle, identified as emission unit SK, is located in building 22. The Steam Kettle can be operated as a solvent-recovery device used to recover solvents from solvent-laden water generated from resin production or used for the warm blending of anodic and cathodic acrylic coatings. The emissions from this facility are vented to a shell-and-tube condenser, which exhausts out one stack, identified as stack SK-S. This facility was installed prior to 1965.

(7) Four (4) resin thinning tanks, identified as emission unit TT-1 through TT4. The intermediate product from the resin kettles is dropped into a thinning tank that contains solvents used to quench the reaction. Thinning tanks TT-1 and TT-2 are each controlled by a separate condenser which exhausts out stacks TT-1 and TT-2, respectively. Thinning tanks TT-3 and TT-4 are uncontrolled unit and are exhausted out stacks TT-3 and TT-4, respectively. This facility was installed prior to 1980.

(8) Tote paint spray booth, identified as emission unit SB28, is located in building 28. This paint booth is used to coat metal totes. The coating application method is air atomization. Particulate emissions are controlled by a dry filter. Emissions from this unit are exhausted out one stack identified as stack vent SB28-S. This facility was constructed in 1977.

(9) One (1) Latex Paint Production Line, identified as emission unit EU-17, consisting of a 6,000 gallon raw material storage tank, a 8,000 gallon dispersion mixer, and a 4,500 gallon letdown tank. This process will incorporate the use of the following existing tanks: 6,000 gallon raw material storage tank, a 6,000 gallon finished goods tank, and a 8,000 gallon finished goods tank. The water-based paint manufacturing process consists of adding dry ingredients to a dispersion mixer and wetting this product with water and ethylene glycol. The product is then mixed and transferred to the letdown tank were QA/QC checks are performed. The product is transferred to the finished product tanks for transfer to shipping containers. The production line has a maximum capacity rate of 20,000 tons per year of finished product. The initial loading and dispersion step of the process generate PM/PM10 emissions. The PM/PM10 emissions are controlled with a Torit Donaldson model TD-1150-155 pulse jet dust collector identified as DC-17.

(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.2.1 Organic Solvents [326 IAC 8-6]

a) The VOC emissions from the emission units listed in paragraphs (a)(1) and (a)(2) of this condition shall be limited to 99 tons per (12) twelve consecutive month period such that the Organic Solvent Regulation 326 IAC 8-6 does not apply.

(1) The following significant emission units are included in this emissions cap; Coating Formulation/Packaging (CF-1), Brighton Resin Kettle (BRK), Electro-Vapor Resin Kettle (EVRK), Steam Kettle (SK), Thinning Tank (TT), Totes Spray Paint Booth (SB28), and Fugitive Equipment Leaks (F-1) and the Orr & Stembower boiler (OSB).

(2) The following insignificant emission units are included in this emissions cap; Six Seven Quality Assurance Paint Booths (QA1 through QA7), Tank Cleaning Operations (TC), Pilot Resin Kettle (PK), Storage Tanks (ST) and Solvent Recovery Unit (SRU).

b) For the purpose of demonstrating compliance with paragraph (a) of this condition, the Permittee shall limited the VOC emissions from the emission units listed in paragraph (b)(1) of this condition to less than or equal to 77.7 tons per twelve (12) consecutive month period. During the first twelve (12) months of operation after issuance of this permit, the VOC

emissions shall be limited such that the total VOC from the emission units listed in paragraph (b)(1) of this condition shall not exceed 77.7 ton. Although monthly VOC emissions will be calculated, the facility will not be out of compliance unless the annual limit is exceeded.

(1) Coating Formulation/Packaging (CF-1), Brighton Resin Kettle (BRK), Electro-Vapor Resin Kettle (EVRK), Steam Kettle (SK), Thinning Tanks (TT), Totes Spray Paint Booth (SB28), Seven Quality Assurance Paint Booths (QA1 through QA7) and Tank Cleaning Operations (TC).

(c) For the purpose of demonstrating compliance with paragraph (a) of this condition, the VOC emissions from the emissions units identified in paragraph (c)(1) of this condition are fixed at 21.3 tons for any twelve (12) consecutive month period. The fixed VOC emission rate of 21.3 tons per twelve (12) consecutive month period for the emission units identified in (c)(1) of this condition is based on the sum of the potential emissions for these units. Any changes to the emission units identified in condition (c)(1) which increases the units potential emissions of VOCs shall require approval prior to implementing the change.

(1) Fugitive Equipment Leaks (F-1), Pilot Resin Kettle (PK), Storage Tanks (ST), Solvent Recovery Unit (SRU) and the Orr & Stembower boiler (OSB).

D.2.2 Particulate Emissions [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the Coating Formulation (CF-1 stacks DC1 through 16), Brighton Resin Kettle (BRK), Electro-Vapor Resin Kettle (EVRK), Totes Spray Paint Booth (SB28), and the Latex manufacturing (DC-17) shall not exceed allowable PM emission rate based on the following equation:

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

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

For Coating Formulation (CF-1 stacks DC1 through DC16, P is equal to 1.5 tons per hour and E is equal to 5.38 pounds per hour.

For the Latex Manufacturing Line (DC-17), P is equal to 3.42 tons per hour and E is equal to 9.4 pounds per hour.

D.2.3 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 Coating Formulation (CF-1), Steam Kettle (SK), Brighton Resin Kettle (BRK), Electro-Vapor Resin Kettle (EVRK) and any pollution control devices.

Compliance Determination Requirements

D.2.4 Testing Requirements [326 IAC 2-7-6(1)]

Testing of these emission units is not specifically required by this permit. However, if testing is required, compliance with the Volatile Organic Compound or Particulate Matter limit specified in Conditions D.2.1 or D.2.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. This does not preclude testing requirements on this facility under 326 IAC 2-7-5 and 326 IAC 2-7-6.

D.2.5 VOC Emissions

Compliance with Condition D.2.1 shall be demonstrated at the end of each month based on the total volatile organic compound emissions for the applicable compliance period. The methodology for calculating the monthly emissions is as follows:

a) For the purposes of this condition, all coatings formulated shall be grouped into one of the following categories based on the end use of the coating; Office Equipment Coatings, Clear Finishes, Pigmented Wood Finishes, Electrodeposition Finishes, Coil Coatings, General Metal Finishes and Pigmented Automotive Coatings. On a monthly basis the Permittee shall

calculate the VOC emissions from formulation by multiplying the monthly weight of finished and intermediate product in each coating category by the corresponding emissions factor for that coating category. The Permittee shall use the emission factors in the table below to calculate the VOC emissions from coating formulation.

Indiana Department of Environmental Management
Office of Air Quality
and
City of Indianapolis
Environmental Resources Management Division

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

Source Background and Description

Source Name:	**Valspar Industries, Incorporated**
Source Location:	**546 West Abbott Street, Indianapolis, Indiana 46225**
County:	**Marion**
SIC Code:	**2851**
Operation Permit No.:	**T097-7789-00040**
Operation Permit Issuance Date:	**August 31, 1999**
Minor Source Modification No.:	**T097-14326-00040**
Minor Permit Modification No.:	**T097-14855-00040**
Permit Reviewer:	**D. Foster**

The City of Indianapolis Environmental Resources Management Division (ERMD) and the Office of Air Quality (OAQ) have reviewed a modification application from Valspar Industries, Incorporated, relating to the construction of one (1) Latex Paint Production Line, identified as emission unit EU-17, consisting of a 6,000 gallon raw material storage tank, a 8,000 gallon dispersion mixer, and a 4,500 gallon letdown tank. This process will incorporate the use of the following existing tanks: 6,000 gallon raw material storage tank, a 6,000 gallon finished goods tank, and a 8,000 gallon finished goods tank. The water-based paint manufacturing process consists of adding dry ingredients to a dispersion mixer and wetting this product with water and ethylene glycol. The product is then mixed and transferred to the letdown tank were QA/QC checks are performed. The product is transferred to the finished product tanks for transfer to shipping containers. The production line has a maximum capacity rate of 20,000 tons per year of finished product. The initial loading and dispersion step of the process generate PM/PM10 emissions. The PM/PM10 emissions are controlled with a Torit Donaldson model TD-1150-155 pulse jet dust collector identified as DC-17.

History

On April 19, 2001, Valspar Industries, Incorporated, submitted an application to ERMD requesting to construct this new latex paint manufacturing line to their existing plant. Valspar Industries, Incorporated, was issued a Part 70 Operating Permit (T097-7789-00040) on August 31, 1999. Valspar was issued an interim permit (T097-14326I-00040) on May 7, 2001 to add this latex paint manufacturing line. Pursuant to 326 IAC 2-7-10.5(d)(4) (Part 70 permits; source modifications),

this request should be processed as a Minor Source Modification because the source is adding emission units which will result in a potential to emit that is less than the emission thresholds specifically identified in 326 IAC 2-7-10.5(d)(4).

Existing Approvals

The source was issued a Part 70 Operating Permit T097-7789-0040 on August 31, 1999. The source has since received the following:

(a) First Administrative Amendment (T097-11482-00040) to their Part 70 Operating Permit, issued on February 16, 2000 to add an existing baghouse, control device DC16.

(b) Second Administrative Amendment (T097-13947-00040) to their Part 70 Operating Permit, issued on February 16, 2001 for a name and owner change from Lilly Industries, Incorporated to Valspar Industries, Incorporated.

(c) Interim Minor Permit Modification (T097-14326i-00040) to their Part 70 Operating Permit, issued on May 7, 2001 for the addition of a new Latex Paint Manufacturing.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (^{0}F)
DC-17	Dust Collector for Latex Paint Manufacture	12	1 x 1.5	2000 cfm	70

Recommendation

The staff recommends to the Commissioner that the Part 70 Minor Source Modification 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 application for the purposes of this review was received on April 19, 2001.

Emission Calculations

The calculations submitted by the applicant have been verified and found to be accurate and correct.

Potential To Emit of Modification

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.”

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	24.7
PM-10	15.1
SO_2	0.0
VOC	0.0
CO	0.0
NO_x	0.0

HAP's	Potential To Emit (tons/year)
Ethylene Glycol	0.071
TOTAL	***0.071***

Justification for Modification

The Part 70 Operating permit is being modified through a Part 70 Minor Permit Modification. This modification is being performed pursuant to 326 IAC 2-7-12, Permit modification, where the modification cannot be accomplished under the program's provisions for administrative permit amendments.

The Part 70 Operating permit is being modified through a Part 70 Minor Source Modification. This modification is being performed pursuant to 326 IAC 2-7-10.5(d)(4)(A), Modifications, where the modifications have a potential to emit of less than twenty-five (25) tons per year and equal to or greater than five (5) tons per year of either particulate matter (PM) or particulate matter less than ten (10) microns (PM_{10}).

County Attainment Status

The source is located in Marion County.

Pollutant	Status
PM-10	unclassifiable
SO_2	maintenance attainment
NO_2	attainment
Ozone	maintenance attainment
CO	attainment
Lead	unclassifiable

(a) Volatile organic compounds (VOC) and oxides of nitrogen (NOx) are precursors for the formation of ozone. Therefore, VOC and NO_X emissions are considered when evaluating the rule applicability relating to the ozone standards. Marion County has been designated as maintenance attainment or unclassifiable for ozone.

Source Status

Existing Source PSD or Emission Offset Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/year)
PM	< 100
PM10	< 100
SO_2	< 100
VOC	< 100
CO	< 100
NO_x	< 100
Single HAP	> 10
Combination HAPs	> 25

(a) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the 28 listed source categories.

(b) The potential emissions (as defined in Indiana Rule) of any single HAP is equal to or greater than ten (10) tons per year and the potential emissions (as defined in Indiana Rule) of a combination 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) The source status is based upon the Part 70 permit T097-7789-00040 issued August 31, 1999.

Potential to Emit of Modification 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 source modification.

	Potential to Emit (tons/year)						
Process/facility	PM(a)	PM-10	SO_2	VOC	CO	NO_X	HAPs (NL)
Water-based Latex manufacturing Line	24.7	15.1	0.0	0.0	0.0	0.0	0.071

(a) PM Potential to Emit before control of the process is 24.7 tpy. PM limited by the Process Weight Rate Regulation 326 IAC 6-3 is 41.2 tpy. Therefore, the PTE of the process is given in this table.

(NL) No applicable limit.

This modification to an existing minor stationary source is not major because the emission increase is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

Federal Rule Applicability

(a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this proposed modification.

(b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this proposed modification.

State Rule Applicability - Individual Facilities

326 IAC 2.4-1 (Major Sources of Hazardous Air Pollutants)

This source is not subject to this rule because it does not have the potential to emit 10 tons per year of any HAP or 25 tons per year of any combination of HAP, and is not a major HAP source as defined in 40 CFR 63.41. The source will have a potential to emit of 0.071 tpy of Ethylene Glycol.

326 IAC 5-1 (Visible Emissions 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 6-3 (Process Weight Rate)

326 IAC 6-3 is applicable to all particulate emitting activities which are not otherwise regulated under Article 6. The particulate emissions for dust control unit DC-17 are limited by the following equation:

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

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

For the new Latex Paint Manufacturing Line, emission unit EU-17, P is equal to 3.42 tons per hour and E is equal to 9.4 pounds per hour. These emissions units will be in compliance with 326 IAC 6-3 as long as the baghouse is maintained and operated in a manner consistent with good air pollution control practices. The baghouse shall be in operation at all times the latex manufacturing line is in operation, in order to comply with this limit.

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

This regulation applies to all facilities constructed after January 1, 1980 which have Potential VOC emissions greater than 25 tons per year and which are not limited by any other provisions under Article 8. This regulation does not apply to this facility since the Latex Manufacturing Line is water-based and incorporates no VOC ingredients.

326 IAC 8-6 (Organic Solvents Emissions Limitation)

326 IAC 8-6 applies to sources in existence prior to January 1, 1980 for which there are no other applicable emissions limitations under 326 IAC 8. This regulation does not apply to this facility since the Latex Manufacturing Line is water-based and incorporates no VOC ingredients.

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, OAM, 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.

There are no compliance monitoring requirements applicable to Latex Manufacturing Line EU17 since:

(a) there are no applicable NSPS rules,
(b) conditions limiting potential to emit,
(c) potential uncontrolled emissions will be less than 25 tons per year, and
(d) controlled emissions will be less than 10 pounds per hour.

Conclusion

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Minor Source Modification No. T097-14326-00040.