



Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

July 2, 2004

100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.in.gov/idem

TO: Interested Parties / Applicant

RE: Holland Colors of America / F177-16240-00051

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures
FNPER.dot 9/16/03



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**FEDERALLY ENFORCEABLE STATE
OPERATING PERMIT (FESOP)
OFFICE OF AIR QUALITY**

**Holland Colors Americas, Inc.
1501 Progress Drive
Richmond, Indiana 47374**

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

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 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. This permit also addresses new source review requirements and is intended to fulfill the new source review procedures and permit revision requirements pursuant to 326 IAC 2-8-11.1, applicable to those conditions.

Operation Permit No.: F 177-16240-00051	
Issued by: Original signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: July 2, 2004 Expiration Date: July 2, 2009

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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 2-8-3(b)]

The Permittee owns and operates a stationary colorant manufacturing source.

Authorized individual:	Engineering Manager
Source Address:	1501 Progress Drive, Richmond, Indiana 47374
Mailing Address:	1501 Progress Drive, Richmond, Indiana 47374
General Source Phone:	(765) 935-0329
SIC Code:	3999
Source Location Status:	Wayne
Source Status:	Attainment for all criteria pollutants Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD Rules; Minor Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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

- (a) Eight (8) Holcobatch production units, each including melting of wax carrier, pouring of the melted wax into a mixing vessel, adding pigments, mixing, and spraying to form beads (the product):
- (1) Unit 1, controlled by cartridge dust collectors #2 and #3, exhausting to Stacks #2 and #3, capacity: 342 pounds per hour;
 - (2) Unit 2, controlled by cartridge dust collectors #2 and #3, exhausting to Stacks #2 and #3, capacity: 342 pounds per hour;
 - (3) Unit 3, controlled by cartridge dust collectors #2 and #3, exhausting to Stacks #2 and #3, capacity: 342 pounds per hour;
 - (4) Unit 4, controlled by cartridge dust collectors #2 and #3, exhausting to Stacks #2 and #3, capacity: 342 pounds per hour;
 - (5) Unit 5, controlled by cartridge dust collectors #2 and #3, exhausting to Stacks #2 and #3, capacity: 100 pounds per hour;
 - (6) Unit 6, controlled by cartridge dust collectors #2 and #3, exhausting to Stacks #2 and #3, capacity: 342 pounds per hour;
 - (7) Unit 7, controlled by cartridge dust collectors #2 and #3, exhausting to Stacks #2 and #3, capacity: 100 pounds per hour; and
 - (8) Unit 8, controlled by baghouse dust collector #6, exhausting to Stack #6, capacity: 342 pounds per hour.

- (b) One (1) Holcomax production unit, equipped with baghouse dust collector #5, exhausting to Stack #5, capacity: 225 pounds per hour.
- (c) One (1) Holcopet mixer, identified as Holcopet Unit 1, controlled by a portable dust collector which exhausts indoors, capacity: 247 pounds per hour.
- (d) One (1) Holcopet mixer, identified as Holcopet Unit 2, controlled by a portable dust collector which exhausts indoors, capacity: 247 pounds per hour.
- (e) Three (3) Holcosil units, identified as #1, #2 and #3, controlled with a portable dust collector which exhausts indoors, capacity: 247 pounds per hour, each.
- (f) One (1) Holcoprill process, identified as Unit 1, consisting of mixing, extrusion, finishing, screening, and packaging, controlled by three (3) dust collectors which exhaust indoors, capacity: 100 pounds per hour.
- (g) One (1) Holcoprill process, identified as Unit 2, consisting of mixing, extrusion, finishing, screening, and packaging, controlled by three (3) dust collectors which exhaust indoors, capacity: 1,100 pounds per hour.
- (h) Two (2) Holcobatch production units, each including melting of wax carrier, pouring of the melted wax into a mixing vessel, adding pigments, mixing with dissolver and spraying to form beads (the product):
 - (1) Unit A, controlled by cartridge dust collector #27, exhausting to Stack #27, capacity: 342 pounds per hour; and
 - (2) Unit B, controlled by cartridge dust collector #27, exhausting to Stack #27, capacity: 342 pounds per hour.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes 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 (10) million BTU per hour:
 - (1) Eleven (11) natural gas-fired heaters, rated at 0.225 million British thermal units per hour, each.
 - (2) Two (2) natural gas-fired heaters, rated at 0.03 million British thermal units per hour, each.
 - (3) Four (4) natural gas-fired heaters, rated at 0.400 million British thermal units per hour, each.
 - (4) Four (4) natural gas-fired heaters, rated at 0.215 million British thermal units per hour, each.
 - (5) One (1) natural gas-fired furnace, rated at 0.05 million British thermal units per hour.
 - (6) One (1) natural gas-fired furnace, rated at 0.15 million British thermal units per hour.

- (7) One (1) natural gas-fired furnace, rated at 0.231 million British thermal units per hour.
 - (8) Two (2) natural gas-fired furnaces, rated at 0.13 million British thermal units per hour.
 - (9) One (1) natural gas-fired heater, rated at 0.080 million British thermal units per hour.
 - (10) One (1) natural gas-fired heater, rated at 0.100 million British thermal units per hour.
 - (11) One (1) natural gas-fired heater, rated at 0.060 million British thermal units per hour.
- (b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6: Three (3) parts washers, capacity: 30 gallons, each. [326 IAC 8-3-2] [326 IAC 8-3-5]
- (c) Other categories with emissions below the insignificant thresholds:
- (1) LSR Production, capacity: 90,000 pounds per year.
 - (2) Laboratory extruder, controlled by one (1) dust collector.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) for a Federally Enforceable State Operating Permit (FESOP).

A.5 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.

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

Indiana statutes from IC 13 and rules from 326 IAC, quoted 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 FESOP under 326 IAC 2-8.

B.2 Definitions [326 IAC 2-8-1]

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.3 Permit Term [326 IAC 2-8-4(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.4 Enforceability [326 IAC 2-8-6]

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

B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

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 2-8-3(h) and 326 IAC 2-8-9.

B.6 Severability [326 IAC 2-8-4(4)]

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.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

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

B.8 Duty to Provide Information [326 IAC 2-8-4(5)(E)]

(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.

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

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

- (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 an authorized individual 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) An authorized individual is defined at 326 IAC 2-1.1-1(1).

B.11 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (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

- (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 2-8-4(3); and
 - (5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.12 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

- (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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance 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 is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.13 Emergency Provisions [326 IAC 2-8-12]

- (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, except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes 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 No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section) or,
Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 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 2-8-4(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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (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 2-8-3(c)(6) 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 2-8 and any other applicable rules.
 - (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) 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.

- (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
- (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.14 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), 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 need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP 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 2-8-4(5)(C)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (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 2-8-8(a)]
- (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 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(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 2-8-8(c)]

B.16 Permit Renewal [326 IAC 2-8-3(h)]

- (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 2-8-3. 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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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, IN 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]
 - (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 until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-8-9]

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 2-8 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 needed to process the application.

B.17 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]
- (d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

B.18 Operational Flexibility [326 IAC 2-8-15] [326 IAC 2-8-11.1]

- (a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without 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 approval required by 326 IAC 2-8-11.1 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-

8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-8-15(b)(2), (c)(1), and (d).

- (b) Emission Trades [326 IAC 2-8-15(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 2-8-15(c).
- (c) Alternative Operating Scenarios [326 IAC 2-8-15(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 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

B.19 Permit Revision Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

B.20 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2] [IC 13-17-3-2] [IC 13-17-3-2] [IC13-30-3-1]

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 FESOP 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, at reasonable times, 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 at reasonable times, 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, at reasonable times, 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.21 Transfer of Ownership or Operational Control [326 IAC 2-8-10] [IC 13-17-3-2]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 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 respon-

sibility, 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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.22 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16] [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) 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 317-233-4320 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.23 Advanced Source Modification Approval [326 IAC 2-8-4(11)] [326 IAC 2-1.1-9]

- (a) The requirements to obtain a permit revision under 326 IAC 2-8-11.1 are satisfied by this permit for the proposed emission units, control equipment or insignificant activities in Sections A.2 and A.3.
- (b) Pursuant to 326 IAC 2-1.1-9 any permit authorizing construction may be revoked if construction of the emission unit has not commenced within eighteen (18) months from the date of issuance of the permit, or if during the construction work is suspended for a continuous period of one (1) year or more.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

C.1 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall also make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable;
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.

(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided the source's potential to emit does not exceed the above specified limits.

(d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

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.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2.

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).

C.6 Operation of Equipment [326 IAC 2-8-5(a)(4)]

Except as otherwise provided by statute, 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.

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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana 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 to use an Indiana Accredited Asbestos inspector is not federally enforceable.

Testing Requirements [326 IAC 2-8-4(3)]

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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

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

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U.S. EPA.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.11 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(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 inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Unless otherwise specified in the approval for the new emissions unit, compliance monitoring for new emission units or emission units added through a permit revision 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 2-8-4(3)] [326 IAC 2-8-5(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 (" 2%) of full scale reading.
- (b) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge that does not meet the above specifications provided the Permittee can demonstrate that an alternative pressure gauge will adequately ensure compliance with permit conditions requiring the measurement of pressure drop.

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

If a regulated substance as defined in 40 CFR 68 is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

C.15 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-8-4] [326 IAC 2-8-5]

(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 is 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, and it will be ten (10) days or more until the unit or device will be shut down, then the Permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down. The notification shall also include the status of the applicable compliance monitoring parameter with respect to normal, and the results of the response actions taken up to the time of notification.
- (4) Failure to take reasonable response steps shall be considered a deviation from 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 an administrative amendment 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 2-8-12 (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.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4] [326 IAC 2-8-5]

- (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 response action documents submitted pursuant to this condition do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.17 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.18 General Reporting Requirements [326 IAC 2-8-4(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 "authorized individual" as defined by 326 IAC2-1.1-1(1).
- (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 Branch, 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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) The first report covered the period commencing on the date of issuance of the original FESOP and ended on the last day of the reporting period. All subsequent reporting periods shall be based on calendar years.

Stratospheric Ozone Protection

C.19 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with 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 2-8-4(10)]: Existing Building

- (a) Eight (8) Holcobatch production units, each including melting of wax carrier, pouring of the melted wax into a mixing vessel, adding pigments, mixing, and spraying to form beads (the product):
 - (1) Unit 1, controlled by cartridge dust collectors #2 and #3, exhausting to Stacks #2 and #3, capacity: 342 pounds per hour;
 - (2) Unit 2, controlled by cartridge dust collectors #2 and #3, exhausting to Stacks #2 and #3, capacity: 342 pounds per hour;
 - (3) Unit 3, controlled by cartridge dust collectors #2 and #3, exhausting to Stacks #2 and #3, capacity: 342 pounds per hour;
 - (4) Unit 4, controlled by cartridge dust collectors #2 and #3, exhausting to Stacks #2 and #3, capacity: 342 pounds per hour;
 - (5) Unit 5, controlled by cartridge dust collectors #2 and #3, exhausting to Stacks #2 and #3, capacity: 100 pounds per hour;
 - (6) Unit 6, controlled by cartridge dust collectors #2 and #3, exhausting to Stacks #2 and #3, capacity: 342 pounds per hour;
 - (7) Unit 7, controlled by cartridge dust collectors #2 and #3, exhausting to Stacks #2 and #3, capacity: 100 pounds per hour; and
 - (8) Unit 8, controlled by baghouse dust collector #6, exhausting to Stack #6, capacity: 342 pounds per hour.
- (b) One (1) Holcomax production unit, equipped with baghouse dust collector #5, exhausting to Stack #5, capacity: 225 pounds per hour.
- (c) One (1) Holcopet mixer, identified as Holcopet Unit 1, controlled by a portable dust collector which exhausts indoors, capacity: 248 pounds per hour.
- (d) One (1) Holcopet mixer, identified as Holcopet Unit 2, controlled by a portable dust collector which exhausts indoors, capacity: 248 pounds per hour.

(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 2-8-4(1)]

D.1.1 Particulate Matter (PM₁₀) [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4, the PM₁₀ emissions shall not exceed the hourly rates expressed in the following table:

Unit ID	Hourly PM ₁₀ Limit (lbs/hr)
Holcobatch Unit 1	1.288
Holcobatch Unit 2	1.288

Unit ID	Hourly PM ₁₀ Limit (lbs/hr)
Holcobatch Unit 3	1.288
Holcobatch Unit 4	1.288
Holcobatch Unit 5	0.377
Holcobatch Unit 6	1.288
Holcobatch Unit 7	0.377
Holcobatch Unit 8	1.288
Holcomax	1.695
Holcopet Unit 1	0.656
Holcopet Unit 2	0.656

Compliance with the above limitations will render the requirements of 326 IAC 2-7 (Part 70) not applicable.

D.1.2 Particulate [326 IAC 6-1-2(a)]

Pursuant to 326 IAC 6-1-2(a) (Nonattainment Area Particulate Limitations), particulate matter (PM) emissions from each Holcobatch Unit, the Holcomax Unit, and each Holcopet Unit shall not exceed 0.03 grain per dry standard cubic foot of exhaust air.

D.1.3 HAPs [326 IAC 2-4.1]

Any change or modification that would increase pigment usage from the entire source such that the worst case single HAP usage increases to one thousand (1,000) tons per year or more, or total HAPs usage increases to 2,500 tons per year or more, may cause the source to become a major source of HAPs emissions, and shall require prior IDEM, OAQ approval.

D.1.4 Preventive Maintenance Plan [326 IAC 1-6-3]

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

Compliance Determination Requirements

D.1.5 Particulate Control

In order to comply with Conditions D.1.1 and D.1.2, the dust collection equipment for particulate control shall be in operation and control emissions from each Holcobatch Unit, the Holcomax Unit, and each Holcopet Unit at all times that these facilities are in operation.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.1.6 Visible Emissions Notations

- (a) Visible emission notations of the Holcobatch Units and the Holcomax process stack exhausts (Stacks #2, #3, #5 and #6) shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation and Implementation shall be considered a deviation from this permit.

D.1.7 Parametric Monitoring

- (a) The Permittee shall record the total static pressure drop across the cartridge dust collectors used in conjunction with Holcobatch Units 1 through 7, at least once per shift when any of the processes are in operation. When for any one reading, the pressure drop across the filter is outside the normal range of 0.5 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation and Implementation shall be considered a deviation from this permit.
- (b) The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the Holcobatch Unit 8, at least once per shift when the process is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 1.0 and 7.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation and Implementation shall be considered a deviation from this permit.
- (c) The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the Holcomax process, at least once per shift when the process is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 0.5 and 6.5 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation and Implementation shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.1.8 Baghouse and Cartridge Filter Inspections

An inspection shall be performed each calendar quarter of all bags and cartridges controlling the Holcobatch Units and the Holcomax process. Inspections required by this condition shall not be performed in consecutive months. All defective bags and cartridges shall be replaced.

D.1.9 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation and Implementation shall be considered a deviation from this permit. If operations continue after failure is observed and it will be ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.
- (b) For single compartment units, if failure is indicated by a significant drop in the pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.10 Record Keeping Requirements

- (a) To document compliance with Condition D.1.3, the Permittee shall maintain monthly records of the amount of each HAPs used.
- (b) To document compliance with Condition D.1.6, the Permittee shall maintain records of visible emission notations of the Holcobatch Units and the Holcomax process stack exhausts (Stacks #2, #3, #5 and #6) once per shift.
- (c) To document compliance with Condition D.1.7, the Permittee shall maintain records once per shift of the total static pressure drop during normal operation.
- (d) To document compliance with Condition D.1.8 the Permittee shall maintain records of the results of the inspections required under Condition D.1.8.
- (e) To document compliance with Condition D.1.4, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (f) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.2

FACILITY CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: New Building

- (e) Three (3) Holcosil units, identified as #1, #2 and #3, controlled with a portable dust collector which exhausts indoors, capacity: 247 pounds per hour, each.
- (f) One (1) Holcoprill process, identified as Unit 1, consisting of mixing, extrusion, finishing, screening, and packaging, controlled by three (3) dust collectors which exhaust indoors, capacity: 100 pounds per hour.
- (g) One (1) Holcoprill process, identified as Unit 2, consisting of mixing, extrusion, finishing, screening, and packaging, controlled by three (3) dust collectors which exhaust indoors, capacity: 1,100 pounds per hour.
- (h) Two (2) Holcobatch production units, each including melting of wax carrier, pouring of the melted wax into a mixing vessel, adding pigments, mixing with dissolver and spraying to form beads (the product):
 - (1) Unit A, controlled by cartridge dust collector #27, exhausting to Stack #27, capacity: 342 pounds per hour; and
 - (2) Unit B, controlled by cartridge dust collector #27, exhausting to Stack #27, capacity: 342 pounds per hour.

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

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1 AND 326 IAC 2-8-11.1, WITH CONDITIONS LISTED BELOW.

Construction Conditions

General Construction Conditions

D.2.1 Permit No Defense

This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

Effective Date of the Permit

D.2.2 Effective Date of the Permit [IC13-15-5-3]

Pursuant to IC 13-15-5-3, this section of this permit becomes effective upon its issuance.

D.2.3 Modification to Construction Conditions [326 IAC 2]

All requirements of these construction conditions shall remain in effect unless modified in a manner consistent with procedures established for revisions pursuant to 326 IAC 2.

Operation Conditions

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.2.4 Particulate Matter (PM₁₀) [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4, the PM₁₀ emissions shall not exceed the hourly rates expressed in the following table:

Unit ID	Hourly PM ₁₀ Limit (lbs/hr)
Holcoprill Unit 1	0.377
Holcoprill Unit 2	4.144
Holcosil Unit 1	0.653
Holcosil Unit 2	0.653
Holcosil Unit 3	0.653
Holcobatch Unit A	1.288
Holcobatch Unit B	1.288

Compliance with the above limitations will render the requirements of 326 IAC 2-7 (Part 70) not applicable.

D.2.5 Particulate [326 IAC 6-1-2(a)]

Pursuant to 326 IAC 6-1-2(a) (Nonattainment Area Particulate Limitations), particulate matter (PM) emissions from each Holcosil unit, each Holcoprill process, and each Holcobatch unit shall not exceed 0.03 grain per dry standard cubic foot of exhaust air.

D.2.6 HAPs [326 IAC 2-4.1]

Any change or modification that would increase pigment usage from the entire source such that the worst case single HAP usage increases to one thousand (1,000) tons per year or more, or total HAPs usage increases to 2,500 tons per year or more, may cause the source to become a major source of HAPs emissions, and shall require prior IDEM, OAQ approval.

D.2.7 Preventive Maintenance Plan [326 IAC 1-6-3]

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

Compliance Determination Requirements

D.2.8 Particulate Control

In order to comply with Conditions D.2.4 and D.2.5, the dust collectors for particulate control shall be in operation and control emissions from each Holcosil unit, each Holcoprill process, and each Holcobatch unit, at all times that these facilities are in operation.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.2.9 Visible Emissions Notations

(a) Visible emission notations of the Holcobatch Units A and B stack exhaust (Stack #27) shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation and Implementation shall be considered a deviation from this permit.

D.2.10 Parametric Monitoring

The Permittee shall record the total static pressure drop across the cartridge dust collector used in conjunction with Holcobatch Units A and B, at least once per shift when any of the processes are in operation. When for any one reading, the pressure drop across the dust collector is outside the normal range of 1.5 and 7.5 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation and Implementation shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.2.11 Dust Collector Inspections

An inspection shall be performed each calendar quarter of all cartridges controlling the Holcobatch Units A and B. Inspections required by this condition shall not be performed in consecutive months. All defective cartridges shall be replaced.

D.2.12 Broken or Failed Cartridge Detection

In the event that cartridge failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation and Implementation shall be considered a deviation from this permit. If operations continue after cartridge failure is observed and it will be ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

- (b) For single compartment dust collectors, if failure is indicated by a significant drop in the dust collector pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if cartridge failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.2.13 Record Keeping Requirements

- (a) To document compliance with Condition D.2.6, the Permittee shall maintain monthly records of the amount of each HAPs used.
- (b) To document compliance with Condition D.2.9, the Permittee shall maintain records of visible emission notations of the Holcobatch Units A and B stack exhaust (Stack #27) once per shift.
- (c) To document compliance with Condition D.2.10, the Permittee shall maintain records once per shift of the total static pressure drop during normal operation.
- (d) To document compliance with Condition D.2.11, the Permittee shall maintain records of the results of the inspections required under Condition D.2.11.
- (e) To document compliance with Condition D.2.7, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (f) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.3

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Insignificant Activities

Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6: Three (3) parts washers, capacity: 30 gallons, each. [326 IAC 8-3-2] [326 IAC 8-3-5]

(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 2-8-4(1)]

D.3.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, the Permittee shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

D.3.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), for cold cleaner degreaser operations without remote solvent reservoirs constructed after July 1, 1990, the Permittee shall ensure that the following control equipment requirements are met:

- (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.
- (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under

the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

- (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
 - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
 - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility construction of which commenced after July 1, 1990, shall ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: Holland Colors Americas, Inc.
Source Address: 1501 Progress Drive, Richmond, Indiana 47374
Mailing Address: 1501 Progress Drive, Richmond, Indiana 47374
FESOP No.: F 177-16240-00051

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Date:

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

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT**

Source Name: Holland Colors Americas, Inc.
Source Address: 1501 Progress Drive, Richmond, Indiana 47374
Mailing Address: 1501 Progress Drive, Richmond, Indiana 47374
FESOP No.: F 177-16240-00051

This form consists of 2 pages

Page 1 of 2

- | |
|---|
| <input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12) <ul style="list-style-type: none">• 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); and• 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**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Holland Colors Americas, Inc.
Source Address: 1501 Progress Drive, Richmond, Indiana 47374
Mailing Address: 1501 Progress Drive, Richmond, Indiana 47374
FESOP No.: F 177-16240-00051

Months: _____ to _____ Year: _____

Page 1 of 2

<p>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".</p>	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> 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:
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:	

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

**Indiana Department of Environmental Management
Office of Air Quality**

Technical Support Document (TSD) for a
Federally Enforceable State Operating Permit (FESOP)

Source Background and Description

Source Name:	Holland Colors Americas, Inc.
Source Location:	1501 Progress Drive, Richmond, Indiana 47374
County:	Wayne
SIC Code:	3999
Operation Permit No.:	F 177-16240-00051
Permit Reviewer:	Edward A. Longenberger

The Office of Air Quality (OAQ) has reviewed a FESOP application from Holland Colors Americas, Inc. relating to the construction and operation of a colorant manufacturing source.

Permitted Emission Units and Pollution Control Equipment

There are no permitted emission units operating at this source during this review process.

Unpermitted Emission Units and Pollution Control Equipment

The source also consists of the following unpermitted emission units:

- (a) Eight (8) Holcobatch production units, constructed in 1992, each including melting of wax carrier, pouring of the melted wax into a mixing vessel, adding pigments, mixing, and spraying to form beads (the product):
- (1) Unit 1, controlled by cartridge dust collectors #2 and #3, exhausting to Stacks #2 and #3, capacity: 342 pounds per hour;
 - (2) Unit 2, controlled by cartridge dust collectors #2 and #3, exhausting to Stacks #2 and #3, capacity: 342 pounds per hour;
 - (3) Unit 3, controlled by cartridge dust collectors #2 and #3, exhausting to Stacks #2 and #3, capacity: 342 pounds per hour;
 - (4) Unit 4, controlled by cartridge dust collectors #2 and #3, exhausting to Stacks #2 and #3, capacity: 342 pounds per hour;
 - (5) Unit 5, controlled by cartridge dust collectors #2 and #3, exhausting to Stacks #2 and #3, capacity: 100 pounds per hour;
 - (6) Unit 6, controlled by cartridge dust collectors #2 and #3, exhausting to Stacks #2 and #3, capacity: 342 pounds per hour;
 - (7) Unit 7, controlled by cartridge dust collectors #2 and #3, exhausting to Stacks #2 and #3, capacity: 100 pounds per hour; and
 - (8) Unit 8, controlled by baghouse dust collector #6, exhausting to Stack #6, capacity: 342 pounds per hour.

- (b) One (1) Holcomax production unit, constructed in 1992, equipped with baghouse dust collector #5, exhausting to Stack #5, capacity: 225 pounds per hour.

New Emission Units and Pollution Control Equipment Receiving Advanced Source Modification Approval

The application includes information relating to the prior approval for the construction and operation of the following equipment pursuant to 326 IAC 2-8-4(11):

- (c) One (1) Holcopet mixer, identified as Holcopet Unit 1, controlled by a portable dust collector which exhausts indoors, capacity: 247 pounds per hour.
- (d) One (1) Holcopet mixer, identified as Holcopet Unit 2, controlled by a portable dust collector which exhausts indoors, capacity: 247 pounds per hour.
- (e) Three (3) Holcosil units, identified as #1, #2 and #3, controlled with a portable dust collector which exhausts indoors, capacity: 247 pounds per hour, each.
- (f) One (1) Holcoprill process, identified as Unit 1, consisting of mixing, extrusion, finishing, screening, and packaging, controlled by three (3) dust collectors which exhaust indoors, capacity: 100 pounds per hour.
- (g) One (1) Holcoprill process, identified as Unit 2, consisting of mixing, extrusion, finishing, screening, and packaging, controlled by three (3) dust collectors which exhaust indoors, capacity: 1,100 pounds per hour.
- (h) Two (2) Holcobatch production units, each including melting of wax carrier, pouring of the melted wax into a mixing vessel, adding pigments, mixing with dissolver and spraying to form beads (the product):
 - (1) Unit A, controlled by baghouse dust collector #27, exhausting to Stack #27, capacity: 342 pounds per hour; and
 - (2) Unit B, controlled by baghouse dust collector #27, exhausting to Stack #27, capacity: 342 pounds per hour.

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 (10) million BTU per hour:
 - (1) Eleven (11) natural gas-fired heaters, rated at 0.225 million British thermal units per hour, each.
 - (2) Two (2) natural gas-fired heaters, rated at 0.03 million British thermal units per hour, each.
 - (3) Four (4) natural gas-fired heaters, rated at 0.400 million British thermal units per hour, each.
 - (4) Four (4) natural gas-fired heaters, rated at 0.215 million British thermal units per hour, each.

- (5) One (1) natural gas-fired furnace, rated at 0.05 million British thermal units per hour.
 - (6) One (1) natural gas-fired furnace, rated at 0.15 million British thermal units per hour.
 - (7) One (1) natural gas-fired furnace, rated at 0.231 million British thermal units per hour.
 - (8) Two (2) natural gas-fired furnaces, rated at 0.13 million British thermal units per hour.
 - (9) One (1) natural gas-fired heater, rated at 0.080 million British thermal units per hour.
 - (10) One (1) natural gas-fired heater, rated at 0.100 million British thermal units per hour.
 - (11) One (1) natural gas-fired heater, rated at 0.060 million British thermal units per hour.
- (b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6: Three (3) parts washers, capacity: 30 gallons, each. [326 IAC 8-3-2] [326 IAC 8-3-5]
- (c) Other categories with emissions below the insignificant thresholds:
- (1) LSR Production, capacity: 90,000 pounds per year.
 - (2) Laboratory extruder, controlled by one (1) dust collector.

Existing Approvals

This source has no previous IDEM, OAQ approvals.

Enforcement Issue

- (a) IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the heading *Unpermitted Emission Units and Pollution Control Equipment*.
- (b) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

Recommendation

The staff recommends to the Commissioner that the FESOP 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 October 18, 2002, with additional information received on July 2, 2003 and April 24, 2004.

There was no notice of completeness letter mailed to the source.

Emission Calculations

See pages 1 through 3 of Appendix A of this document for detailed emission calculations.

The potential VOC emissions from clean up solvents has been conservatively estimated to be 1.0 ton per year.

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 or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U.S. EPA, the department, or the appropriate local air pollution control agency.”

Pollutant	Potential to Emit (tons/yr)
PM	119
PM ₁₀	102
SO ₂	0.016
VOC	1.14
CO	2.18
NO _x	2.60

HAPs	Potential to Emit (tons/yr)
Single	Less than 10.0
Total	Less than 25.0

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM₁₀ is equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7. The source will be issued a FESOP because the source will limit its emissions below the Title V levels.
- (b) 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.

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits of the emission units. Any control equipment is considered enforceable only after issuance of this FESOP and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/emission unit	Potential To Emit (tons/year)						HAPs
	PM	PM ₁₀	SO ₂	VOC	CO	NO _x	
Holcobatch Unit 1	0.749	5.644	-	-	-	-	Single less than 10.0 Total less than 25.0
Holcobatch Unit 2	0.749	5.644	-	-	-	-	
Holcobatch Unit 3	0.749	5.644	-	-	-	-	
Holcobatch Unit 4	0.749	5.644	-	-	-	-	
Holcobatch Unit 5	0.219	1.650	-	-	-	-	
Holcobatch Unit 6	0.749	5.644	-	-	-	-	
Holcobatch Unit 7	0.219	1.650	-	-	-	-	
Holcobatch Unit 8	0.749	5.644	-	-	-	-	
Holcomax	0.986	7.426	-	-	-	-	
Holcoprill Unit 1	0.219	1.650	-	-	-	-	
Holcoprill Unit 2	2.409	18.152	-	-	-	-	
Holcosil Unit 1	0.380	2.860	-	-	-	-	
Holcosil Unit 2	0.380	2.860	-	-	-	-	
Holcosil Unit 3	0.380	2.860	-	-	-	-	
Holcopet Unit 1	0.381	2.871	-	-	-	-	
Holcopet Unit 2	0.381	2.871	-	-	-	-	
Holcobatch Unit A	0.749	5.644	-	-	-	-	
Holcobatch Unit B	0.749	5.644	-	-	-	-	
Insignificant Activities	0.049	0.197	0.016	1.14	2.18	2.60	Neg.
Total Emissions	12.0	90.2	0.016	1.14	2.18	2.60	Single less than 10.0 Total less than 25.0

County Attainment Status

The source is located in Wayne County.

Pollutant	Status
PM ₁₀	Attainment
SO ₂	Maintenance attainment
NO ₂	Attainment
Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) 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. Wayne County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.
- (b) Wayne County has been classified as attainment or unclassifiable for all remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.

Source Status

Existing Source PSD, Part 70, or FESOP Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/yr)
PM	12.0
PM ₁₀	10.4
SO ₂	0.016
VOC	1.14
CO	2.18
NO _x	2.60
Single HAP	Less than 10.0
Combination HAPs	Less than 25.0

This existing source is **not** a major stationary source because it is not one of the 28 listed source categories, and does not emit two hundred fifty (250) tons per year or more of any regulated pollutant.

Federal Rule Applicability

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

- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP)(326 IAC 14, 20 and 40 CFR Part 61, 63) applicable to this source.

State Rule Applicability – Entire Source

326 IAC 2-6 (Emission Reporting)

This source is not located in Lake or Porter County with the potential to emit greater than twenty-five (25) tons per year of NO_x, does not emit five (5) tons per year or more of lead and does not require a Part 70 Operating Permit. Therefore, the requirements of 326 IAC 2-6 do not apply.

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 alternative opacity limitations), opacity shall meet the following, unless otherwise stated in the 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.

326 IAC 2-8-4 (FESOP)

Pursuant to this rule, the amount of PM₁₀, SO₂, VOC, CO and NO_x shall each be limited to less than one hundred (100) tons per year. In addition, the amount of a single HAP shall be limited to less than ten (10) tons per year and the combination of all HAPs shall be limited to less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 2-7 (Part 70), do not apply.

The PM₁₀ emissions from the significant emission units will be limited to less than ninety (90) tons per year, thus, the requirements of 326 IAC 2-7 are not applicable. This limitation was chosen to allow for future expansion. In order to make this limitation federally enforceable, each significant emission unit will be assigned an hourly PM₁₀ emission limit. Given that the plant could potentially operate 8,760 hours per year, the following hourly limits will ensure that the PM₁₀ emissions from this source are less than the Part 70 thresholds:

Unit ID	Hourly PM ₁₀ Limit (lbs/hr)	Equivalent Emission Rate (tons/yr)
Holcobatch Unit 1	1.288	5.644
Holcobatch Unit 2	1.288	5.644
Holcobatch Unit 3	1.288	5.644
Holcobatch Unit 4	1.288	5.644
Holcobatch Unit 5	0.377	1.650
Holcobatch Unit 6	1.288	5.644
Holcobatch Unit 7	0.377	1.650

Unit ID	Hourly PM ₁₀ Limit (lbs/hr)	Equivalent Emission Rate (tons/yr)
Holcobatch Unit 8	1.288	5.644
Holcomax	1.695	7.426
Holcoprill Unit 1	0.377	1.650
Holcoprill Unit 2	4.144	18.152
Holcosil Unit 1	0.653	2.860
Holcosil Unit 2	0.653	2.860
Holcosil Unit 3	0.653	2.860
Holcopet Unit 1	0.656	2.871
Holcopet Unit 2	0.656	2.871
Holcobatch Unit A	1.288	5.644
Holcobatch Unit B	1.288	5.644
Total		90.000

Based on information in the application and calculations made, the source will be in compliance with the above limits. Therefore, the requirements of 326 IAC 2-7 are not applicable.

State Rule Applicability – Individual Facilities

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

This colorant manufacturing source will emit less than ten (10) tons per year of a single HAP or twenty-five (25) tons per year of a combination of HAPs. Therefore, the requirements of 326 IAC 2-4.1 and 326 IAC 2-7 (Part 70) do not apply.

Some of the powder pigments used at this source contain metallic HAPs. According to the emission factors, one percent (1%) by weight of pigment handled is emitted to the atmosphere as dust, most of which is captured by the dust collection equipment. Therefore, any change or modification that would increase the worst case single HAP usage to one thousand (1,000) tons per year or more, or total HAPs usage to 2,500 tons per year or more, may cause the source to become a major source of HAPs emissions, and shall require prior IDEM, OAQ approval.

326 IAC 6-1 (Particulate rules; nonattainment area limitations)

This source is subject to the requirements of 326 IAC 6-1 because is located in Wayne county and has potential particulate emissions greater than one hundred (100) tons per year. Since this source is not specifically listed in 326 IAC 6-1-14, the facilities shall be subject to the limitation in 326 IAC 6-1-2(a). Therefore, pursuant to 326 IAC 6-1-2(a), particulate emissions from each emission unit shall not exceed 0.03 grain per dry standard cubic feet.

The baghouses, cartridge filters, and portable dust collection equipment shall be operated at all times that the associated emission units are in operation, in order to comply with this limit.

State Rule Applicability – Insignificant Activities

326 IAC 8-3-2 (Cold Cleaner Operations)

Pursuant to 326 IAC 8-3-2, for cold cleaning operations constructed after January 1, 1980, the Permittee shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control)

- (a) Pursuant to 326 IAC 8-3-5(a), for cold cleaner degreaser operations without remote solvent reservoirs constructed after July 1, 1990, the Permittee shall ensure that the following control equipment requirements are met:
 - (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.
 - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
 - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
 - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.

- (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility construction of which commenced after July 1, 1990, shall ensure that the following operating requirements are met:
 - (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

Testing Requirements

All emission calculations were based on AP-42 emission factors, and minimal control efficiencies are needed to comply with the applicable permit limitations. Therefore, no testing is required.

Compliance Requirements

Permits issued under 326 IAC 2-8 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 2-8-4. 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 in Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

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

- (a) The Holcobatch Units 1 through 7 have applicable compliance monitoring conditions as specified below:
- (1) Visible emission notations of the Holcobatch Units 1 through 7 stack exhausts (Stacks #2 and #3) shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal. For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.
 - (2) The Permittee shall record the total static pressure drop across the cartridge dust collectors used in conjunction with Holcobatch Units 1 through 7, at least once per shift when any of the processes are in operation. When for any one reading, the pressure drop across the filter is outside the normal range of 0.5 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports.
 - (3) An inspection shall be performed each calendar quarter of all cartridges controlling the Holcobatch Units 1 through 7. Inspections required by this condition shall not be performed in consecutive months. All defective cartridges shall be replaced.
 - (4) In the event that cartridge failure has been observed:
 - (A) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation and Implementation shall be considered a deviation from this permit. If operations continue after failure is observed and it will be ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.
 - (B) For single compartment units, if failure is indicated by a significant drop in the pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if cartridge failure is determined by

other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced.

These monitoring conditions are necessary because the dust collection equipment for the Holcobatch Units 1 through 7 must operate properly to ensure compliance with 326 IAC 6-1 (Nonattainment Area Particulate Limitations) and 326 IAC 2-8 (FESOP).

- (b) The Holcobatch Unit 8 has applicable compliance monitoring conditions as specified below:
- (1) Visible emission notations of the Holcobatch Unit 8 stack exhaust (Stack #6) shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal. For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.
 - (2) The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the Holcobatch Unit 8, at least once per shift when the process is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 17.0 and 23.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports.
 - (3) An inspection shall be performed each calendar quarter of all bags controlling the Holcobatch Unit 8. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.
 - (4) In the event that bag failure has been observed:
 - (A) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation and Implementation shall be considered a deviation from this permit. If operations continue after bag failure is observed and it will be ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will

be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

- (B) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced.

These monitoring conditions are necessary because the dust collection equipment for the Holcobatch Unit 8 must operate properly to ensure compliance with 326 IAC 6-1 (Non-attainment Area Particulate Limitations) and 326 IAC 2-8 (FESOP).

- (c) The Holcomax process has applicable compliance monitoring conditions as specified below:
- (1) Visible emission notations of the Holcomax process stack exhaust (Stack #5) shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal. For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.
 - (2) The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the Holcomax process, at least once per shift when the process is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 17.0 and 23.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports.
 - (3) An inspection shall be performed each calendar quarter of all bags controlling the Holcomax process. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.
 - (4) In the event that bag failure has been observed:
 - (A) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response

steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation and Implementation shall be considered a deviation from this permit. If operations continue after bag failure is observed and it will be ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

- (B) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced.

These monitoring conditions are necessary because the dust collection equipment for the Holcomax process must operate properly to ensure compliance with 326 IAC 6-1 (Non-attainment Area Particulate Limitations) and 326 IAC 2-8 (FESOP).

- (d) The Holcobatch Units A and B have applicable compliance monitoring conditions as specified below:
- (1) Visible emission notations of the Holcobatch Units A and B stack exhaust (Stack #27) shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal. For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.
 - (2) The Permittee shall record the total static pressure drop across the baghouse used in conjunction with Holcobatch Units A and B, at least once per shift when any of the processes are in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 1.5 and 7.5 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports.
 - (3) An inspection shall be performed each calendar quarter of all bags controlling the Holcobatch Units A and B. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.
 - (4) In the event that bag failure has been observed:

- (A) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation and Implementation shall be considered a deviation from this permit. If operations continue after bag failure is observed and it will be ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

- (B) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced.

These monitoring conditions are necessary because the dust collection equipment for the Holcobatch Units A and B must operate properly to ensure compliance with 326 IAC 6-1 (Nonattainment Area Particulate Limitations) and 326 IAC 2-8 (FESOP).

Conclusion

The construction and operation of this colorant manufacturing source shall be subject to the conditions of the FESOP 177-16240-00051.

Indiana Department of Environmental Management Office of Air Quality

Addendum to the Technical Support Document for a Federally Enforceable State Operating Permit (FESOP)

Source Name: Holland Colors Americas, Inc.
Source Location: 1501 Progress Drive, Richmond, Indiana 47374
County: Wayne
FESOP: F 177-16240-00051
SIC Code: 3999
Permit Reviewer: Edward A. Longenberger

On May 28, 2004, the Office of Air Quality (OAQ) had a notice published in the Palladium Item, Richmond, Indiana, stating that Holland Colors Americas, Inc. had applied for a Federally Enforceable State Operating Permit (FESOP) to operate a colorant manufacturing source with cartridge dust collectors for particulate control. The notice also stated that OAQ proposed to issue a FESOP for this operation and provided information on how the public could review the proposed FESOP 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 FESOP should be issued as proposed.

On June 2, 2004, Tom Stiens of Holland Colors Americas, Inc. submitted comments on the proposed FESOP. The comments are as follows. The permit language, if changed, has deleted language as ~~strikeouts~~ and new language **bolded**:

Comment 1:

The dust collection system associated with Holcobatch Units A and B will be a cartridge dust collector, not a baghouse.

Response 1:

The facility descriptions in Sections A.2 and D.2 have been changed as shown below. In addition, this change results in minor changes to the compliance monitoring conditions for the dust collector (Conditions D.2.10, D.2.11 and D.2.12):

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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

- (h) Two (2) Holcobatch production units, each including melting of wax carrier, pouring of the melted wax into a mixing vessel, adding pigments, mixing with dissolver and spraying to form beads (the product):
 - (1) Unit A, controlled by ~~baghouse~~ **cartridge** dust collector #27, exhausting to Stack #27, capacity: 342 pounds per hour; and
 - (2) Unit B, controlled by ~~baghouse~~ **cartridge** dust collector #27, exhausting to Stack #27, capacity: 342 pounds per hour.

SECTION D.2 FACILITY CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: New Building

- (h) Two (2) Holcobatch production units, each including melting of wax carrier, pouring of the melted wax into a mixing vessel, adding pigments, mixing with dissolver and spraying to form beads (the product):
- (1) Unit A, controlled by ~~baghouse~~ **cartridge** dust collector #27, exhausting to Stack #27, capacity: 342 pounds per hour; and
 - (2) Unit B, controlled by ~~baghouse~~ **cartridge** dust collector #27, exhausting to Stack #27, capacity: 342 pounds per hour.

D.2.10 Parametric Monitoring

The Permittee shall record the total static pressure drop across the ~~baghouse~~ **cartridge dust collector** used in conjunction with Holcobatch Units A and B, at least once per shift when any of the processes are in operation. When for any one reading, the pressure drop across the ~~baghouse~~ **dust collector** is outside the normal range of 1.5 and 7.5 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation and Implementation shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.2.11 ~~Baghouse~~ Dust Collector Inspections

An inspection shall be performed each calendar quarter of all ~~bags~~ **cartridges** controlling the Holcobatch Units A and B. Inspections required by this condition shall not be performed in consecutive months. All defective ~~bags~~ **cartridges** shall be replaced.

D.2.12 Broken or Failed ~~Bag~~ Cartridge Detection

In the event that ~~bag~~ **cartridge** failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation and Implementation shall be considered a deviation from this permit. If operations continue after ~~bag~~ **cartridge** failure is observed and it will be ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

- (b) For single compartment ~~baghouses~~ **dust collectors**, if failure is indicated by a significant drop in the ~~baghouse's~~ **dust collector** pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if ~~bag~~ **cartridge** failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced.

Comment 2:

The normal pressure drop ranges across the Holcobatch Unit 8 and the Holcomax baghouses are incorrect. The correct pressure drop ranges should be 1.0 to 7.0 inches of water and 0.5 to 6.5 inches of water, respectively.

Response 2:

The pressure drop ranges in Condition D.1.7(b) and (c) have been changed as follows:

D.1.7 Parametric Monitoring

- (b) The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the Holcobatch Unit 8, at least once per shift when the process is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of ~~4-7.0~~ **1.0** and ~~23.0~~ **7.0** inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation and Implementation shall be considered a deviation from this permit.
- (c) The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the Holcomax process, at least once per shift when the process is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of ~~4-7.0~~ **0.5** and ~~23.0~~ **6.5** inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation and Implementation shall be considered a deviation from this permit.

**Appendix A: Potential Emission Calculations
Emissions From Pigment Handling**

**Company Name: Holland Colors Americas, Inc.
Address City IN Zip: 1501 Progress Drive, Richmond, Indiana 47374
FESOP: 177-16240
Plt ID: 177-00051
Reviewer: Edward A. Longenberger
Application Date: October 18, 2002**

Unit ID	Pigment Usage Rate (lbs/hr)	PM Emission Factor (lbs/ton)	Uncontrolled Emission Rate (lbs/hr)	Uncontrolled Emission Rate (tons/yr)	Control Efficiency (%)	Controlled Emission Rate (lbs/hr)	Controlled Emission Rate (tons/yr)
Holcobatch Unit 1	171.000	20	1.710	7.490	90.00%	0.171	0.749
Holcobatch Unit 2	171.000	20	1.710	7.490	90.00%	0.171	0.749
Holcobatch Unit 3	171.000	20	1.710	7.490	90.00%	0.171	0.749
Holcobatch Unit 4	171.000	20	1.710	7.490	90.00%	0.171	0.749
Holcobatch Unit 5	50.000	20	0.500	2.190	90.00%	0.050	0.219
Holcobatch Unit 6	171.000	20	1.710	7.490	90.00%	0.171	0.749
Holcobatch Unit 7	50.000	20	0.500	2.190	90.00%	0.050	0.219
Holcobatch Unit 8	171.000	20	1.710	7.490	90.00%	0.171	0.749
Holcomax	225.000	20	2.250	9.855	90.00%	0.225	0.986
Holcoprill Unit 1	50.000	20	0.500	2.190	90.00%	0.050	0.219
Holcoprill Unit 2	550.000	20	5.500	24.090	90.00%	0.550	2.409
Holcosil Unit 1	86.667	20	0.867	3.796	90.00%	0.087	0.380
Holcosil Unit 2	86.667	20	0.867	3.796	90.00%	0.087	0.380
Holcosil Unit 3	86.667	20	0.867	3.796	90.00%	0.087	0.380
Holcopet Unit 1	87.000	20	0.870	3.811	90.00%	0.087	0.381
Holcopet Unit 2	87.000	20	0.870	3.811	90.00%	0.087	0.381
Holcobatch Unit A	171.000	20	1.710	7.490	90.00%	0.171	0.749
Holcobatch Unit B	171.000	20	1.710	7.490	90.00%	0.171	0.749
			Total PM	119.443		Total PM	11.944

Unit ID	Pigment Usage Rate (lbs/hr)	PM-10 Emission Factor (lbs/ton)	Uncontrolled Emission Rate (lbs/hr)	Uncontrolled Emission Rate (tons/yr)	Control Efficiency (%)	Controlled Emission Rate (lbs/hr)	Controlled Emission Rate (tons/yr)
Holcobatch Unit 1	171.000	17	1.454	6.366	90.00%	0.145	0.637
Holcobatch Unit 2	171.000	17	1.454	6.366	90.00%	0.145	0.637
Holcobatch Unit 3	171.000	17	1.454	6.366	90.00%	0.145	0.637
Holcobatch Unit 4	171.000	17	1.454	6.366	90.00%	0.145	0.637
Holcobatch Unit 5	50.000	17	0.425	1.862	90.00%	0.043	0.186
Holcobatch Unit 6	171.000	17	1.454	6.366	90.00%	0.145	0.637
Holcobatch Unit 7	50.000	17	0.425	1.862	90.00%	0.043	0.186
Holcobatch Unit 8	171.000	17	1.454	6.366	90.00%	0.145	0.637
Holcomax	225.000	17	1.913	8.377	90.00%	0.191	0.838
Holcoprill Unit 1	50.000	17	0.425	1.862	90.00%	0.043	0.186
Holcoprill Unit 2	550.000	17	4.675	20.477	90.00%	0.468	2.048
Holcosil Unit 1	86.667	17	0.737	3.227	90.00%	0.074	0.323
Holcosil Unit 2	86.667	17	0.737	3.227	90.00%	0.074	0.323
Holcosil Unit 3	86.667	17	0.737	3.227	90.00%	0.074	0.323
Holcopet Unit 1	87.000	17	0.740	3.239	90.00%	0.074	0.324
Holcopet Unit 2	87.000	17	0.740	3.239	90.00%	0.074	0.324
Holcobatch Unit A	171.000	17	1.454	6.366	90.00%	0.145	0.637
Holcobatch Unit B	171.000	17	1.454	6.366	90.00%	0.145	0.637
			Total PM-10	101.526		Total PM-10	10.153

METHODOLOGY

Allowable Emission Rate refers to allowable particulate emission rate prescribed by 326 IAC 6-3-2
 Uncontrolled Emission Rate (lbs/hr) = Pigment Throughput (lbs/hr) x 1 ton/2000 lbs x EF (lbs/ton)
 Uncontrolled Emission Rate (tons/yr) = Throughput (lbs/hr) x 1 ton/2000 lbs x EF (lbs/ton) x 8760 (hrs/yr) / 2000 (lbs/ton)
 Controlled Emission Rate (lbs/hr) = Uncontrolled Emission Rate (lbs/hr) x (1-Control Eff)
 Controlled Emission Rate (tons/yr) = Uncontrolled Emission Rate (tons/yr) x (1-Control Eff)
 Emission factors from FIRE 6.24 (SCC 3-01-014-02)

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100**

Company Name: Holland Colors Americas, Inc.
Address City IN Zip: 1501 Progress Drive, Richmond, Indiana 47374
Permit Number: 177-16240
Plt ID: 177-00051
Reviewer: Edward A. Longenberger
Application Date: October 18, 2002

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

5.93

52

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Potential Emission in tons/yr	1.90	7.60	0.600	100	5.50	84.0
	0.049	0.197	0.016	2.60	0.143	2.180

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See page 3 for HAPs emissions calculations.

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
HAPs Emissions**

Company Name: Holland Colors Americas, Inc.
Address City IN Zip: 1501 Progress Drive, Richmond, Indiana 47374
Permit Number: 177-16240
Plt ID: 177-00051
Reviewer: Edward A. Longenberger
Date: October 18, 2002

HAPs - Organics						
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	
Emission Factor in lb/MMcf	2.10E-03	1.20E-03	7.50E-02	1.80E+00	3.40E-03	
Potential Emission in tons/yr	5.45E-05	3.11E-05	1.95E-03	4.67E-02	8.82E-05	

HAPs - Metals						
	Lead	Cadmium	Chromium	Manganese	Nickel	Total HAPs
Emission Factor in lb/MMcf	5.00E-04	1.10E-03	1.40E-03	3.80E-04	2.10E-03	
Potential Emission in tons/yr	1.30E-05	2.86E-05	3.63E-05	9.86E-06	5.45E-05	0.049

Methodology is the same as page 2.

The five highest organic and metal HAPs emission factors are provided above.
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.