Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(317) 232-8603
(800) 451-6027
www.in.gov/idem

PART 70 OPERATING PERMIT RENEWAL
OFFICE OF AIR QUALITY

Roll Coater, Inc.
1950 E. Main Street
Greenfield, Indiana 46140

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

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

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

Operation Permit No.: T059-17551-00002	
Issued by: Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: Expiration Date:

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SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary coil coating operation.

Source Address:	1950 E. Main Street, Greenfield, Indiana 46140
Mailing Address:	1950 East Main Street, Greenfield, Indiana 46140
General Source Phone Number:	(317) 462-7761
SIC Code:	3479
County Location:	Hancock
Source Location Status:	Nonattainment for 8-hour Ozone Standard Attainment for all other criteria pollutants,
Source Status:	Part 70 Permit Program Minor Source, under PSD Rules; Major Source, under Emission Offset Rules; Major Source, Section 112 of the Clean Air Act

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

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

(a) One (1) Cleaver Brooks firetube natural gas-fueled boiler, constructed in December 1996, identified as Boiler, with a maximum heat input capacity of 12.56 million British thermal units per hour, exhausting to stack 22. This unit is an affected unit under 40 CFR 60, Subpart Dc and 40 CFR 63, Subpart DDDDD.

(b) One (1) metal coil coating line, identified as Line 2, with a maximum throughput of 300 gallons of solvent per hour, using one (1) thermal oxidizer as control, and consisting of the following equipment:

(1) One (1) wet section and brush, constructed in 1964, exhausting to stack 1;

(2) Cooling towers, constructed in October 1993, exhausting to stack 2;

(3) Cooling towers, constructed in October 1993, exhausting to stack 3;

(4) One (1) thermal oxidizer stack (via heat exchanger), constructed in September 1995, identified as stack 4A;

(5) One (1) thermal oxidizer stack, constructed in September 1995, identified as stack 4B;

(6) One (1) prime coater room, constructed in 1964, utilizing rollcoating, exhausting to stack 5;

(7) One (1) finish coater room, constructed in 1964, utilizing rollcoating, exhausting to stack 6;

(8) One (1) finish quench, constructed in 1964, exhausting to stack 7;

(9) One (1) air knife exhaust, constructed in 1964, identified as stack 20.

This metal coil coating line, identified as Line 2, is an affected unit under 40 CFR 60, Subpart TT, and 40 CFR 63 Subpart SSSS.

(c) One (1) metal coil coating line, constructed in 1968, identified as Line 3, with a maximum throughput of 280 gallons of solvent per hour, using one (1) thermal oxidizer as control, and consisting of the following equipment:

(1) One (1) preclean wet section, exhausting to stack 11;

(2) One (1) wet section exhaust, identified as stack 12;

(3) One (1) prime and finish coater, utilizing rollcoating, exhausting to stack 13;

(4) One (1) thermal oxidizer (prime), constructed in 1968, exhausting to stack 14A;

(5) One (1) thermal oxidizer exhaust (prime via waste heat fired boiler), identified as stack 14b;

(6) One (1) thermal oxidizer (finish), constructed in 1968, exhausting to stack 15A;

(7) One (1) thermal oxidizer exhaust (finish via waste heat fired boiler), identified as stack 15B;

(8) One (1) prime quench, exhausting to stack 16;

(9) One (1) finish quench, exhausting to stack 17;

(10) Cooling towers, exhausting to stack 18;

(11) Cooling towers, exhausting to stack 19;

(12) One (1) air knife exhaust, identified as stack 21;

(13) One (1) Line 3 natural gas-fueled air make-up unit, constructed in June 1992, identified as Air Make-up, with a maximum heat input capacity of 12.96 million British thermal units per hour.

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

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

(a) Paved and unpaved roads with public access. [326 IAC 6-4]

(b) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minutes, including the following: deburring, buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations. [326 IAC 6-3-2]

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

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

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

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

SECTION B GENERAL CONDITIONS

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

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

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

(a) This permit, T059-17551-00002, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

(b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

B.3 Term of Conditions [326 IAC 2-1.1-9.5]

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

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

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

B.4 Enforceability [326 IAC 2-7-7]

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

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

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

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

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

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

(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.

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

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

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state

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

(b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.

(c) A responsible official is defined at 326 IAC 2-7-1(34).

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

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

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

and

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

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and

(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

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

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) for the source as described in 326 IAC 1-6-2. At a minimum, the PMPs shall include:

(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.

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

(c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

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

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

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

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

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

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

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

IDEM Main Office:
Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or
Telephone Number: 317-233-0178 (ask for Compliance Section)
Facsimile Number: 317-233-6865

(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
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

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

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

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

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

(e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.

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

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

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

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

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

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

(b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

(c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

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

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

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

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

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

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

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

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

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

(a) All terms and conditions of permits established prior to T059-17551-00002 and issued pursuant to permitting programs approved into the state implementation plan have been either

(1) incorporated as originally stated,

(2) revised under 326 IAC 2-7-10.5, or

(3) deleted under 326 IAC 2-7-10.5.

(b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

B.14 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003

Indianapolis, Indiana 46204-2251

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

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

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

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

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

(1) That this permit contains a material mistake.

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

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

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

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

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

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

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

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

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

(2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.

B.17 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

(a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

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

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

B.18 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

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

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

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

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

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;

(3) The changes do not result in emissions which exceed the limitations provided in 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
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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, on a rolling five (5) year basis, which document all such changes and emissions trades that are subject to 326 IAC 2-7-20(b), (c), or (e). The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-7-20(b)(1), (c)(1), and (e)(2).

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

(c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

(d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

(e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.20 Source Modification Requirement [326 IAC 2-7-10.5] [326 IAC 2-2-2] [326 IAC 2-3-2]

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

(b) Any modification at an existing major source is governed by the requirements of 326 IAC 2-2-2 and 326 IAC 2-3-2.

B.21 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2] [IC 13-30-3-1] [IC 13-17-3-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;

(c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.22 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

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

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

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]

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

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

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

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

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

SECTION C **SOURCE OPERATION CONDITIONS**

Entire Source

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

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e)(2), the allowable particulate emissions rate from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

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 fourty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

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

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

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 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
MC 61-52 IGCN 1003
Indianapolis, Indiana 46204-2251

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) 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 2-7-6(1)]

C.7 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
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ no 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.8 Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

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

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

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

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

C.10 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.

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

C.11 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

(a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on December 12, 1996.

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

C.12 Risk Management Plan [326 IAC 2-7-5(12)] [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.13 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit(s) (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.

(b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:

(1) initial inspection and evaluation;

(2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or

(3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

(c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:

(1) monitoring results;

(2) review of operation and maintenance procedures and records;

(3) inspection of the control device, associated capture system, and the process.

(d) Failure to take reasonable response steps shall be considered a deviation from the permit.

(e) The Permittee shall maintain the following records:

(1) monitoring data;

(2) monitor performance data, if applicable; and

(3) corrective actions taken.

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

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

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

C.15 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

(a) Pursuant to 326 IAC 2-6-3(b)(1), the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

(1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);

(2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1 (32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue
MC 61-50 IGCN 1003
Indianapolis, Indiana 46204-2251

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

(b) The emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

C.16 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

(a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. 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) If there is a "project" (as defined in 326 IAC 2-2-1(qq)) at an existing emissions unit or at a source with Plantwide Applicability Limitation (PAL), which is not part of a "major modification" (as defined in 326 IAC 2-2-1(ee)) and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1(rr) and/or 326 IAC 2-3-1(mm)), the Permittee shall comply with following:

(1) Before beginning actual construction of the "project" (as defined in 326 IAC 2-2-1(qq) and/or 326 IAC 2-3-1(ll) at an existing emissions unit, document and maintain the following records:

(A) A description of the project.

(B) Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.

(C) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:

(i) Baseline actual emissions;

(ii) Projected actual emissions;

(iii) Amount of emissions excluded under section 326 IAC 2-2-1(rr)(2)(A)(iii) and/or 326 IAC 2-3-1(mm)(2)(A)(3); and

(iv) An explanation for why the amount was excluded, and any netting calculations, if applicable.

(2) Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emissions unit identified in (1)(B) above; and

(3) Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.

C.17 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [326 IAC 2-3]

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

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003

Indianapolis, Indiana 46204-2251

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

(f) If the Permittee is required to comply with the recordkeeping provisions of (c) in Section C - General Record Keeping Requirements for any "project" (as defined in 326 IAC 2-2-1(qq) and/or 326 IAC 2-3-1(ll) at an existing emissions unit, and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ:

(1) The annual emissions, in tons per year, from the project identified in (c)(1) in Section C - General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C - General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-2-1(xx) and/or 326 IAC 2-3-1(qq), for that regulated NSR pollutant, and

(2) The emissions differ from the preconstruction projection as documented and maintained under Section C - General Record Keeping Requirements (c)(1)(C)(ii).

(g) The report for project at an existing emissions unit shall be submitted within sixty (60) days after the end of the year and contain the following:

(1) The name, address, and telephone number of the major stationary source.

(2) The annual emissions calculated in accordance with (c)(2) and (3) in Section C - General Record Keeping Requirements.

(3) The emissions calculated under the actual-to-projected actual test stated in 326 IAC 2-2-2(d)(3) and/or 326 IAC 2-3-2(c)(3).

(4) Any other information that the Permittee deems fit to include in this report,

Reports required in this part shall be submitted to:

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

(h) The Permittee shall make the information required to be documented and maintained in accordance with (c) in Section C - General Record Keeping Requirements available for review upon a request for inspection by IDEM, OAQ. The general public may request this information from the IDEM, OAQ under 326 IAC 17.1.

Stratospheric Ozone Protection

C.18 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 – One (1) Boiler

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

(a) One (1) Cleaver Brooks firetube natural gas-fueled boiler, constructed in December 1996, identified as Boiler, with a maximum heat input capacity of 12.56 million British thermal units per hour, exhausting to stack 22. This unit is an affected unit under 40 CFR 60, Subpart Dc and 40 CFR 63, Subpart DDDDD.

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

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

D.1.1 Particulate Emission Limitations for Sources of Indirect Heating [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating: Emission limitations for facilities specified in 326 IAC 6-2-1(d)), the PM emissions from the Cleaver Brooks 12.56 MMBtu/hr boiler shall not exceed 0.56 pound per million Btu heat input (lb/MMBtu). This limitation was calculated using the following equation:

$$Pt = \frac{1.09}{Q^{0.26}}$$ Where Q = total source capacity (MMBtu/hr)

D.1.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

SECTION D.2 FACILITY OPERATION CONDITIONS – Two (2) coil-coating lines (Line 2 and Line 3)

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

(b) One (1) metal coil coating line, identified as Line 2, with a maximum throughput of 300 gallons of solvent per hour, using one (1) thermal oxidizer as control, and consisting of the following equipment:

(1) One (1) wet section and brush, constructed in 1964, exhausting to stack 1;

(2) Cooling towers, constructed in October 1993, exhausting to stack 2;

(3) Cooling towers, constructed in October 1993, exhausting to stack 3;

(4) One (1) thermal oxidizer stack (via heat exchanger), constructed in September 1995, identified as stack 4A;

(5) One (1) thermal oxidizer stack, constructed in September 1995, identified as stack 4B;

(6) One (1) prime coater room, constructed in 1964, utilizing rollcoating, exhausting to stack 5;

(7) One (1) finish coater room, constructed in 1964, utilizing rollcoating, exhausting to stack 6;

(8) One (1) finish quench, constructed in 1964, exhausting to stack 7;

(9) One (1) air knife exhaust, constructed in 1964, identified as stack 20.

This metal coil coating line, identified as Line 2, is an affected unit under 40 CFR 60, Subpart TT, and 40 CFR 63 Subpart SSSS.

(c) One (1) metal coil coating line, constructed in 1968, identified as Line 3, with a maximum throughput of 280 gallons of solvent per hour, using one (1) thermal oxidizer as control, and consisting of the following equipment:

(1) One (1) preclean wet section, exhausting to stack 11;

(2) One (1) wet section exhaust, identified as stack 12;

(3) One (1) prime and finish coater, utilizing rollcoating, exhausting to stack 13;

(4) One (1) thermal oxidizer (prime), constructed in 1968, exhausting to stack 14A;

(5) One (1) thermal oxidizer exhaust (prime via waste heat fired boiler), identified as stack 14b;

(6) One (1) thermal oxidizer (finish), constructed in 1968, exhausting to stack 15A;

(7) One (1) thermal oxidizer exhaust (finish via waste heat fired boiler), identified as stack 15B;

(8) One (1) prime quench, exhausting to stack 16;

(9) One (1) finish quench, exhausting to stack 17;

(10) Cooling towers, exhausting to stack 18;

(11) Cooling towers, exhausting to stack 19;

(12) One (1) air knife exhaust, identified as stack 21;

(13) One (1) Line 3 natural gas-fueled air make-up unit, constructed in June 1992, identified as Air Make-up, with a maximum heat input capacity of 12.96 million British thermal units 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 2-7-5(1)]

D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-4]

(a) Pursuant to 326 IAC 8-2-4 (Coil Coating Emission Limitations), the Permittee shall not allow or permit the discharge into the atmosphere of any volatile organic compound in excess of 2.6 pounds per gallon of coating, excluding water, delivered to the coating applicator, when surface coating metal coils in Line 2 and Line 3.

(b) When operating the thermal oxidizer to achieve the limit for 326 IAC 8-2-4, 2.6 pounds of VOC emitted to the atmosphere per gallon of coating less water delivered to the applicator, the thermal oxidizer shall maintain a minimum overall control efficiency of 90%. Based upon 326 IAC 8-1-2(c) and the overall control efficiency of 90%, the actual VOC content of the coating shall not exceed 40.2 pounds per gallon of coating solids delivered to the applicator.

D.2.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

D.2.3 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

In order to demonstrate compliance with Condition D.2.1, the Permittee shall perform VOC testing for both Line 2 and 3, using coatings that are equal to or greater than ninety percent (90%) of worst case potential VOC emissions, utilizing Method 25 (40 CFR 60 Appendix A), or other methods as approved by the Commissioner. This test was performed on November 18, 2005, for Line 2 and Line 3. This test shall be repeated at least once every five years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

D.2.4 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

Pursuant to CP 059-4512-00002, issued on October 4, 1995, the thermal oxidizers for VOC control shall be in operation at all times when coating is being applied in the metal coil coating line (Line 2) and metal coil coating line (Line 3) and the coating applied contains VOC.

Compliance with the VOC content and usage limitations contained in Condition D.2.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 325 IC 8-1-4.

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

D.2.5 Thermal Oxidizer [40 CFR 64]

(a) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring operating temperature when coating is being applied and the coating contains VOC. For the purpose of this condition, continuous means no less than once per fifteen (15) minute period. The output of this system shall be recorded as a 3-hour average. The Permittee shall take appropriate response steps in accordance with Section C – Excursions and Exceedances whenever the 3-hour average temperature of the thermal oxidizer is below temperature established from the most recent valid stack test. A 3-hour average temperature that is below the temperature established from the most recent valid stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C – Excursions and Exceedances shall be considered a deviation from this permit.

(b) The Permittee shall determine the 3-hour average temperature from the most recent valid stack test that demonstrates compliance with limits in condition D.2.1, as approved by IDEM.

D.2.6 Parametric Monitoring [40 CFR 64]

(a) The Permittee shall determine duct pressure from the most recent valid stack test that demonstrates compliance with limits in condition D.2.1, as approved by IDEM.

(b) The duct pressure shall be observed at least once per day when the thermal oxidizer is in operation. When for any one reading, the duct pressure is outside the normal range as established in most recent compliant stack test, the Permittee shall take reasonable response steps in accordance with Section C – Excursions and Exceedances. A reading that is outside the range as established in the most recent compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C – Excursions and Exceedances shall be considered a deviation from this permit.

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

D.2.7 Record Keeping Requirements

(a) To document compliance with Condition D.2.1, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC content limits and/or the VOC emission limits established in Condition D.2.1. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

(1) The VOC content of each coating material and solvent used.

(2) The volume weighted VOC content of the coatings used for each month;

(3) The continuous temperature records (on a 3-hour average basis) for the thermal oxidizer and the 3-hour average temperature used to demonstrate compliance during the most recent compliant stack test.

(4) Daily records of the duct pressure.

(b) 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 2-7-5(15)]:

Insignificant Activities

(c) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minutes, including the following: deburring, buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations. [326 IAC 6-3-2]

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

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

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

Pursuant to 326 IAC 6-3, the particulate matter from the insignificant grinding and machining operations, including deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking operations shall not exceed an amount determined by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

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

SECTION E.1 FACILITY OPERATION CONDITIONS

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

(a) One (1) Cleaver Brooks firetube natural gas-fueled boiler, constructed in December 1996, identified as Boiler, with a maximum heat input capacity of 12.56 million British thermal units per hour, exhausting to stack 22. This unit is an affected unit under 40 CFR 60, Subpart Dc and 40 CFR 63, Subpart DDDDD.

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

New Source Performance Standards (NSPS) Requirements [326 IAC 2-8-4(1)]

E.1.1 General Provisions Relating to New Source Performance Standards [326 IAC 12-1] [40 CFR Part 60, Subpart A]

(a) Pursuant to 40 CFR 60.1, the Permittee shall comply with the provisions of 40 CFR Part 60 Subpart A – General Provisions, which are incorporated by reference as 326 IAC 12-1 for the one (1) Cleaver Brooks firetube natural gas-fueled boiler, except as otherwise specified in 40 CFR Part 60, Subpart Dc.

(b) Pursuant to 40 CFR 60.19, the Permittee shall submit all required notifications and reports to:

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

E.1.2 Standard of Performance for Small Industrial-Commercial-Institutional Steam Generating Units Requirements [40 CFR Part 60, Subpart Dc]

Pursuant to 40 CFR Part 60, Subpart Dc, the Permittee shall comply with the provisions of Standard of Performance for Small Industrial-Commercial-Institutional Steam Generating Units, which are incorporated by reference as 326 IAC 12, for the one (1) Cleaver Brooks firetube natural gas-fueled boiler as follows:

Subpart Dc-Standards of Performance for Small Industrial Commercial-Institutional Steam Generating Units

Source: 55 FR 37683, Sept. 12, 1990, unless otherwise noted.

§ 60.40c Applicability and delegation of authority.

(a) Except as provided in paragraph (d) of this section, the affected facility to which this subpart applies is each steam generating unit for which construction, modification, or reconstruction is commenced after June 9, 1989 and that has a maximum design heat input capacity of 29 megawatts (MW) (100 million Btu per hour (Btu/hr)) or less, but greater than or equal to 2.9 MW (10 million Btu/hr).

(b) In delegating implementation and enforcement authority to a State under section 111(c) of the Clean Air Act, §60.48c(a)(4) shall be retained by the Administrator and not transferred to a State.

[55 FR 37683, Sept. 12, 1990, as amended at 61 FR 20736, May 8, 1996; 71 FR 9884, Feb. 27, 2006]

§ 60.41c Definitions.

As used in this subpart, all terms not defined herein shall have the meaning given them in the Clean Air Act and in subpart A of this part.

Annual capacity factor means the ratio between the actual heat input to a steam generating unit from an individual fuel or combination of fuels during a period of 12 consecutive calendar months and the potential heat input to the steam generating unit from all fuels had the steam generating unit been operated for

8,760 hours during that 12-month period at the maximum design heat input capacity. In the case of steam generating units that are rented or leased, the actual heat input shall be determined based on the combined heat input from all operations of the affected facility during a period of 12 consecutive calendar months.

Coal means all solid fuels classified as anthracite, bituminous, subbituminous, or lignite by the American Society of Testing and Materials in ASTM D388–77, 90, 91, 95, or 98a, Standard Specification for Classification of Coals by Rank (IBR—see §60.17), coal refuse, and petroleum coke. Coal-derived synthetic fuels derived from coal for the purposes of creating useful heat, including but not limited to solvent refined coal, gasified coal, coal-oil mixtures, and coal-water mixtures, are also included in this definition for the purposes of this subpart.

Coal refuse means any by-product of coal mining or coal cleaning operations with an ash content greater than 50 percent (by weight) and a heating value less than 13,900 kilojoules per kilogram (kJ/kg) (6,000 Btu per pound (Btu/lb) on a dry basis.

Cogeneration steam generating unit means a steam generating unit that simultaneously produces both electrical (or mechanical) and thermal energy from the same primary energy source.

Combined cycle system means a system in which a separate source (such as a stationary gas turbine, internal combustion engine, or kiln) provides exhaust gas to a steam generating unit.

Combustion research means the experimental firing of any fuel or combination of fuels in a steam generating unit for the purpose of conducting research and development of more efficient combustion or more effective prevention or control of air pollutant emissions from combustion, provided that, during these periods of research and development, the heat generated is not used for any purpose other than preheating combustion air for use by that steam generating unit (i.e., the heat generated is released to the atmosphere without being used for space heating, process heating, driving pumps, preheating combustion air for other units, generating electricity, or any other purpose).

Conventional technology means wet flue gas desulfurization technology, dry flue gas desulfurization technology, atmospheric fluidized bed combustion technology, and oil hydrodesulfurization technology.

Distillate oil means fuel oil that complies with the specifications for fuel oil numbers 1 or 2, as defined by the American Society for Testing and Materials in ASTM D396–78, 89, 90, 92, 96, or 98, “Standard Specification for Fuel Oils” (incorporated by reference—see §60.17).

Dry flue gas desulfurization technology means a sulfur dioxide (SO_2) control system that is located between the steam generating unit and the exhaust vent or stack, and that removes sulfur oxides from the combustion gases of the steam generating unit by contacting the combustion gases with an alkaline slurry or solution and forming a dry powder material. This definition includes devices where the dry powder material is subsequently converted to another form. Alkaline reagents used in dry flue gas desulfurization systems include, but are not limited to, lime and sodium compounds.

Duct burner means a device that combusts fuel and that is placed in the exhaust duct from another source (such as a stationary gas turbine, internal combustion engine, kiln, etc.) to allow the firing of additional fuel to heat the exhaust gases before the exhaust gases enter a steam generating unit.

Emerging technology means any SO_2 control system that is not defined as a conventional technology under this section, and for which the owner or operator of the affected facility has received approval from the Administrator to operate as an emerging technology under §60.48c(a)(4).

Federally enforceable means all limitations and conditions that are enforceable by the Administrator, including the requirements of 40 CFR Parts 60 and 61, requirements within any applicable State implementation plan, and any permit requirements established under 40 CFR 52.21 or under 40 CFR 51.18 and 40 CFR 51.24.

Fluidized bed combustion technology means a device wherein fuel is distributed onto a bed (or series of beds) of limestone aggregate (or other sorbent materials) for combustion; and these materials are forced upward in the device by the flow of combustion air and the gaseous products of combustion. Fluidized bed combustion technology includes, but is not limited to, bubbling bed units and circulating bed units.

Fuel pretreatment means a process that removes a portion of the sulfur in a fuel before combustion of the fuel in a steam generating unit.

Heat input means heat derived from combustion of fuel in a steam generating unit and does not include the heat derived from preheated combustion air, recirculated flue gases, or exhaust gases from other sources (such as stationary gas turbines, internal combustion engines, and kilns).

Heat transfer medium means any material that is used to transfer heat from one point to another point.

Maximum design heat input capacity means the ability of a steam generating unit to combust a stated maximum amount of fuel (or combination of fuels) on a steady state basis as determined by the physical design and characteristics of the steam generating unit.

Natural gas means (1) a naturally occurring mixture of hydrocarbon and nonhydrocarbon gases found in geologic formations beneath the earth's surface, of which the principal constituent is methane, or (2) liquefied petroleum (LP) gas, as defined by the American Society for Testing and Materials in ASTM D1835–86, 87, 91, or 97, “Standard Specification for Liquefied Petroleum Gases” (incorporated by reference—see §60.17).

Noncontinental area means the State of Hawaii, the Virgin Islands, Guam, American Samoa, the Commonwealth of Puerto Rico, or the Northern Mariana Islands.

Oil means crude oil or petroleum, or a liquid fuel derived from crude oil or petroleum, including distillate oil and residual oil.

Potential sulfur dioxide emission rate means the theoretical SO_2 emissions (nanograms per joule [ng/J], or pounds per million Btu [lb/million Btu] heat input) that would result from combusting fuel in an uncleaned state and without using emission control systems.

Process heater means a device that is primarily used to heat a material to initiate or promote a chemical reaction in which the material participates as a reactant or catalyst.

Residual oil means crude oil, fuel oil that does not comply with the specifications under the definition of distillate oil, and all fuel oil numbers 4, 5, and 6, as defined by the American Society for Testing and Materials in ASTM D396–78, 89, 90, 92, 96, or 98, “Standard Specification for Fuel Oils” (incorporated by reference—see §60.17).

Steam generating unit means a device that combusts any fuel and produces steam or heats water or any other heat transfer medium. This term includes any duct burner that combusts fuel and is part of a combined cycle system. This term does not include process heaters as defined in this subpart.

Steam generating unit operating day means a 24-hour period between 12:00 midnight and the following midnight during which any fuel is combusted at any time in the steam generating unit. It is not necessary for fuel to be combusted continuously for the entire 24-hour period.

Wet flue gas desulfurization technology means an SO_2 control system that is located between the steam generating unit and the exhaust vent or stack, and that removes sulfur oxides from the combustion gases of the steam generating unit by contacting the combustion gases with an alkaline slurry or solution and forming a liquid material. This definition includes devices where the liquid material is subsequently converted to another form. Alkaline reagents used in wet flue gas desulfurization systems include, but are not limited to, lime, limestone, and sodium compounds.

Wet scrubber system means any emission control device that mixes an aqueous stream or slurry with the exhaust gases from a steam generating unit to control emissions of particulate matter (PM) or SO_2.

Wood means wood, wood residue, bark, or any derivative fuel or residue thereof, in any form, including but not limited to sawdust, sanderdust, wood chips, scraps, slabs, millings, shavings, and processed pellets made from wood or other forest residues.

[55 FR 37683, Sept. 12, 1990, as amended at 61 FR 20736, May 8, 1996; 65 FR 61752, Oct. 17, 2000; 71 FR 9884, Feb. 27, 2006]

§ 60.48c Reporting and recordkeeping requirements.

(a) The owner or operator of each affected facility shall submit notification of the date of construction or reconstruction, anticipated startup, and actual startup, as provided by §60.7 of this part. This notification shall include:

(1) The design heat input capacity of the affected facility and identification of fuels to be combusted in the affected facility.

(2) If applicable, a copy of any Federally enforceable requirement that limits the annual capacity factor for any fuel or mixture of fuels under §60.42c, or §60.43c.

(3) The annual capacity factor at which the owner or operator anticipates operating the affected facility based on all fuels fired and based on each individual fuel fired.

(g)(1) Except as provided under paragraphs (g)(2) and (g)(3) of this section, the owner or operator of each affected facility shall record and maintain records of the amount of each fuel combusted during each operating day.

(2) As an alternative to meeting the requirements of paragraph (g)(1) of this section, the owner or operator of an affected facility that combusts only natural gas, wood, fuels using fuel certification in §60.48c(f) to demonstrate compliance with the SO_2 standard, fuels not subject to an emissions standard (excluding opacity), or a mixture of these fuels may elect to record and maintain records of the amount of each fuel combusted during each calendar month.

(3) As an alternative to meeting the requirements of paragraph (g)(1) of this section, the owner or operator of an affected facility or multiple affected facilities located on a contiguous property unit where the only fuels combusted in any steam generating unit (including steam generating units not subject to this subpart) at that property are natural gas, wood, distillate oil meeting the most current requirements in §60.42C to use fuel certification to demonstrate compliance with the SO_2 standard, and/or fuels, excluding coal and residual oil, not subject to an emissions standard (excluding opacity) may elect to record and maintain records of the total amount of each steam generating unit fuel delivered to that property during each calendar month.

(i) All records required under this section shall be maintained by the owner or operator of the affected facility for a period of two years following the date of such record.

(j) The reporting period for the reports required under this subpart is each six-month period. All reports shall be submitted to the Administrator and shall be postmarked by the 30th day following the end of the reporting period.

[55 FR 37683, Sept. 12, 1990, as amended at 64 FR 7465, Feb. 12, 1999; 65 FR 61753, Oct. 17, 2000; 71 FR 9886, Feb. 27, 2006 72 FR 32759, June 13, 2007]

SECTION E.2 FACILITY OPERATION CONDITIONS

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

(b) One (1) metal coil coating line, identified as Line 2, with a maximum throughput of 300 gallons of solvent per hour, using one (1) thermal oxidizer as control, and consisting of the following equipment:

(1) One (1) wet section and brush, constructed in 1964, exhausting to stack 1;

(2) Cooling towers, constructed in October 1993, exhausting to stack 2;

(3) Cooling towers, constructed in October 1993, exhausting to stack 3;

(4) One (1) thermal oxidizer stack (via heat exchanger), constructed in September 1995, identified as stack 4A;

(5) One (1) thermal oxidizer stack, constructed in September 1995, identified as stack 4B;

(6) One (1) prime coater room, constructed in 1964, utilizing rollcoating, exhausting to stack 5;

(7) One (1) finish coater room, constructed in 1964, utilizing rollcoating, exhausting to stack 6;

(8) One (1) finish quench, constructed in 1964, exhausting to stack 7;

(9) One (1) air knife exhaust, constructed in 1964, identified as stack 20.

This metal coil coating line, identified as Line 2, is an affected unit under 40 CFR 60, Subpart TT, and 40 CFR 63 Subpart SSSS.

(c) One (1) metal coil coating line, constructed in 1968, identified as Line 3, with a maximum throughput of 280 gallons of solvent per hour, using one (1) thermal oxidizer as control, and consisting of the following equipment:

(1) One (1) preclean wet section, exhausting to stack 11;

(2) One (1) wet section exhaust, identified as stack 12;

(3) One (1) prime and finish coater, utilizing rollcoating, exhausting to stack 13;

(4) One (1) thermal oxidizer (prime), constructed in 1968, exhausting to stack 14A;

(5) One (1) thermal oxidizer exhaust (prime via waste heat fired boiler), identified as stack 14b;

(6) One (1) thermal oxidizer (finish), constructed in 1968, exhausting to stack 15A;

(7) One (1) thermal oxidizer exhaust (finish via waste heat fired boiler), identified as stack 15B;

(8) One (1) prime quench, exhausting to stack 16;

(9) One (1) finish quench, exhausting to stack 17;

(10) Cooling towers, exhausting to stack 18;

(11) Cooling towers, exhausting to stack 19;

(12) One (1) air knife exhaust, identified as stack 21;

(13) One (1) Line 3 natural gas-fueled air make-up unit, constructed in June 1992, identified as Air Make-up, with a maximum heat input capacity of 12.96 million British thermal units per hour.

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

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

E.2.1 General Provisions Relating to NESHAP [326 IAC 20-1][40 CFR Part 63, Subpart A]

The provisions of 40 CFR 63 Subpart A - General Provisions, which are incorporated by reference as 326 IAC 20-1-1, apply to the affected source, as designated by 40 CFR 63.5140(b). The Permittee must comply with these requirements on and after June 10, 2002.

E.2.2 National Emission Standards for Hazardous Air Pollutants for Surface Coating of Metal Coil [40 CFR Part 63, Subpart SSSS]

(a) The affected source is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Metal Coil, (40 CFR 63, Subpart SSSS), as of the effective date of 40 CFR 63, Subpart SSSS. Pursuant to this rule, the Permittee must comply with the provisions of 40 CFR 63, Subpart SSSS on and after June 10, 2005. The portions of the metal coil coating line to which the emission limitations apply are the coating application stations and associated curing ovens.

(b) The Permittee must comply with the provisions of 40 CFR 63, Subpart SSSS, which are incorporated by reference as 326 IAC 20, for the metal coil coating lines Line 2 and Line 3, as follows:

Subpart SSSS-National Emission Standards for Hazardous Air Pollutants: Surface Coating of Metal Coil

§ 63.5080 What is in this subpart?

This subpart describes the actions you must take to reduce emissions of hazardous air pollutants (HAP) if you own or operate a facility that performs metal coil surface coating operations and is a major source of HAP. This subpart establishes emission standards and states what you must do to comply. Certain requirements apply to all who must comply with the subpart; others depend on the means you use to comply with an emission standard.

§ 63.5090 Does this subpart apply to me?

(a) The provisions of this subpart apply to each facility that is a major source of HAP, as defined in §63.2, at which a coil coating line is operated, except as provided in paragraph (b) of this section.

§ 63.5100 Which of my emissions sources are affected by this subpart?

The affected source subject to this subpart is the collection of all of the coil coating lines at your facility.

§ 63.5110 What special definitions are used in this subpart?

All terms used in this subpart that are not defined in this section have the meaning given to them in the Clean Air Act (CAA) and in subpart A of this part.

Always-controlled work station means a work station associated with a curing oven from which the curing oven exhaust is delivered to a control device with no provision for the oven exhaust to bypass the control device. Sampling lines for analyzers and relief valves needed for safety purposes are not considered bypass lines.

Capture efficiency means the fraction of all organic HAP emissions generated by a process that is delivered to a control device, expressed as a percentage.

Capture system means a hood, enclosed room, or other means of collecting organic HAP emissions and conveying them to a control device.

Car-seal means a seal that is placed on a device that is used to change the position of a valve or damper (e.g., from open to closed) in such a way that the position of the valve or damper cannot be changed without breaking the seal.

Coating means material applied onto or impregnated into a substrate for decorative, protective, or functional purposes. Such materials include, but are not limited to, paints, varnishes, sealants, inks,

adhesives, maskants, and temporary coatings. Decorative, protective, or functional materials that consist only of solvents, protective oils, acids, bases, or any combination of these substances are not considered coatings for the purposes of this subpart.

Coating material means the coating and other products (e.g., a catalyst and resin in multi-component coatings) combined to make a single material at the coating facility that is applied to metal coil. For the purposes of this subpart, an organic solvent that is used to thin a coating prior to application to the metal coil is considered a coating material.

Coil coating line means a process and the collection of equipment used to apply an organic coating to the surface of metal coil. A coil coating line includes a web unwind or feed section, a series of one or more work stations, any associated curing oven, wet section, and quench station. A coil coating line does not include ancillary operations such as mixing/thinning, cleaning, wastewater treatment, and storage of coating material.

Control device means a device such as a solvent recovery device or oxidizer which reduces the organic HAP in an exhaust gas by recovery or by destruction.

Control device efficiency means the ratio of organic HAP emissions recovered or destroyed by a control device to the total organic HAP emissions that are introduced into the control device, expressed as a percentage.

Curing oven means the device that uses heat or radiation to dry or cure the coating material applied to the metal coil.

Day means a 24-consecutive-hour period.

Deviation means any instance in which an affected source, subject to this subpart, or an owner or operator of such a source:

(1) Fails to meet any requirement or obligation established by this subpart including, but not limited to, any emission limitation (including any operating limit) or work practice standard;

(2) Fails to meet any term or condition that is adopted to implement an applicable requirement in this subpart and that is included in the operating permit for any affected source required to obtain such a permit; or

(3) Fails to meet any emission limitation (including any operating limit) or work practice standard in this subpart during start-up, shutdown, or malfunction, regardless of whether or not such failure is permitted by this subpart.

Existing affected source means an affected source the construction of which commenced on or before July 18, 2000, and it has not subsequently undergone reconstruction as defined in §63.2.

Facility means all contiguous or adjoining property that is under common ownership or control, including properties that are separated only by a road or other public right-of-way.

Flexible packaging means any package or part of a package the shape of which can be readily changed. Flexible packaging includes but is not limited to bags, pouches, labels, liners and wraps utilizing paper, plastic, film, aluminum foil, metalized or coated paper or film, or any combination of these materials.

HAP applied means the organic HAP content of all coating materials applied to a substrate by a coil coating line.

Intermittently-controllable work station means a work station associated with a curing oven with provisions for the curing oven exhaust to be delivered to a control device or diverted from a control device through a bypass line, depending on the position of a valve or damper. Sampling lines for analyzers and relief valves needed for safety purposes are not considered bypass lines.

Metal coil means a continuous metal strip that is at least 0.15 millimeter (0.006 inch) thick, which is packaged in a roll or coil prior to coating. After coating, it may or may not be rewound into a roll or coil. Metal coil does not include metal webs that are coated for use in flexible packaging.

Month means a calendar month or a pre-specified period of 28 days to 35 days to allow for flexibility in recordkeeping when data are based on a business accounting period.

Never-controlled work station means a work station which is not equipped with provisions by which any emissions, including those in the exhaust from any associated curing oven, may be delivered to a control device.

New affected source means an affected source the construction or reconstruction of which commenced after July 18, 2000.

Overall organic HAP control efficiency means the total efficiency of a control system, determined either by:

(1) The product of the capture efficiency as determined in accordance with the requirements of §63.5160(e) and the control device efficiency as determined in accordance with the requirements of §63.5160(a)(1)(i) and (ii) or §63.5160(d); or

(2) A liquid-liquid material balance in accordance with the requirements of §63.5170(e)(1).

Permanent total enclosure (PTE) means a permanently installed enclosure that meets the criteria of Method 204 of appendix M, 40 CFR part 51 for a PTE, and that directs all the exhaust gases from the enclosure to a control device.

Protective oil means an organic material that is applied to metal for the purpose of providing lubrication or protection from corrosion without forming a solid film. This definition of protective oil includes but is not limited to lubricating oils, evaporative oils (including those that evaporate completely), and extrusion oils.

Research or laboratory equipment means any equipment for which the primary purpose is to conduct research and development into new processes and products, where such equipment is operated under the close supervision of technically trained personnel and is not engaged in the manufacture of products for commercial sale in commerce, except in a de minimis manner.

Temporary total enclosure (TTE) means an enclosure constructed for the purpose of measuring the capture efficiency of pollutants emitted from a given source, as defined in Method 204 of 40 CFR part 51, appendix M.

Work station means a unit on a coil coating line where coating material is deposited onto the metal coil substrate.

§ 63.5120 What emission standards must I meet?

(a) Each coil coating affected source must limit organic HAP emissions to the level specified in paragraph (a)(1), (2), or (3) of this section:

(1) No more than 2 percent of the organic HAP applied for each month during each 12-month compliance period (98 percent reduction); or

(2) No more than 0.046 kilogram (kg) of organic HAP per liter of solids applied during each 12-month compliance period; or

(3) If you use an oxidizer to control organic HAP emissions, operate the oxidizer such that an outlet organic HAP concentration of no greater than 20 parts per million by volume (ppmv) on a dry basis is achieved and the efficiency of the capture system is 100 percent.

(b) You must demonstrate compliance with one of these standards by following the applicable procedures in §63.5170.

§ 63.5121 What operating limits must I meet?

(a) Except as provided in paragraph (b) of this section, for any coil coating line for which you use an add-on control device, unless you use a solvent recovery system and conduct a liquid-liquid material balance according to §63.5170(e)(1), you must meet the applicable operating limits specified in Table 1 to this subpart. You must establish the operating limits during the performance test according to the requirements in §63.5160(d)(3). You must meet the operating limits at all times after you establish them.

§ 63.5130 When must I comply?

(a) For an existing affected source, the compliance date is 3 years after June 10, 2002.

(d) The initial compliance period begins on the applicable compliance date specified in paragraph (a) or (b) of this section and ends on the last day of the 12th month following the compliance date. If the compliance date falls on any day other than the first day of a month, then the initial compliance period extends through that month plus the next 12 months.

(e) For the purpose of demonstrating continuous compliance, a compliance period consists of 12 months. Each month after the end of the initial compliance period described in paragraph (d) of this section is the end of a compliance period consisting of that month and the preceding 11 months.

§ 63.5140 What general requirements must I meet to comply with the standards?

(a) You must be in compliance with the standards in this subpart at all times, except during periods of start-up, shutdown, and malfunction of any capture system and control device used to comply with this subpart. If you are complying with the emission standards of this subpart without the use of a capture system and control device, you must be in compliance with the standards at all times, including periods of start-up, shutdown, and malfunction.

(b) Table 2 of this subpart provides cross references to subpart A of this part, indicating the applicability of the General Provisions requirements to this subpart.

§ 63.5150 If I use a control device to comply with the emission standards, what monitoring must I do?

Table 1 to § 63.5150_Control Device Monitoring Requirements Index

If you operate a coil coating line and have the following:	Then you must:
1. Control device.....	Monitor control device operating parameters (§ 63.5150(a)(3)).
2. Capture system.....	Monitor capture system operating parameters (§ 63.5150(a)(4)).

(a) To demonstrate continuing compliance with the standards, you must monitor and inspect each capture system and each control device required to comply with §63.5120 following the date on which the initial performance test of the capture system and control device is completed. You must install and operate the monitoring equipment as specified in paragraphs (a)(1) through (4) of this section.

(3) *Temperature monitoring of oxidizers*. If you are complying with the requirements of the standards in §63.5120 through the use of an oxidizer and demonstrating continuous compliance through monitoring of an oxidizer operating parameter, you must comply with paragraphs (a)(3)(i) through (iii) of this section.

(i) Install, calibrate, maintain, and operate temperature monitoring equipment according to manufacturer's specifications. The calibration of the chart recorder, data logger, or temperature indicator must be verified every 3 months; or the chart recorder, data logger, or temperature indicator must be replaced. You must replace the equipment either if you choose not to perform the calibration, or if the equipment cannot be calibrated properly. Each temperature monitoring device must be equipped with a continuous recorder. The device must have an accuracy of ±1 percent of the temperature being monitored in degrees Celsius, or ±1 °Celsius, whichever is greater.

(ii) For an oxidizer other than a catalytic oxidizer, to demonstrate continuous compliance with the operating limit established according to §63.5160(d)(3)(i), you must install the thermocouple or temperature sensor in the combustion chamber at a location in the combustion zone.

(4) *Capture system monitoring*. If you are complying with the requirements of the standards in §63.5120 through the use of a capture system and control device, you must develop a capture system monitoring plan containing the information specified in paragraphs (a)(4)(i) and (ii) of this section. You must monitor the capture system in accordance with paragraph (a)(4)(iii) of this section. You must make the monitoring plan available for inspection by the permitting authority upon request.

(i) The monitoring plan must identify the operating parameter to be monitored to ensure that the capture efficiency measured during the initial compliance test is maintained, explain why this parameter is appropriate for demonstrating ongoing compliance, and identify the specific monitoring procedures.

(ii) The plan also must specify operating limits at the capture system operating parameter value, or range of values, that demonstrates compliance with the standards in §63.5120. The operating limits must represent the conditions indicative of proper operation and maintenance of the capture system.

(iii) You must conduct monitoring in accordance with the plan.

(b) Any deviation from the required operating parameters which are monitored in accordance with paragraphs (a)(3) and (4) of this section, unless otherwise excused, will be considered a deviation from the operating limit.

§ 63.5160 What performance tests must I complete?

Table 1 to §63.5160—Required Performance Testing Summary

If you control HAP on your coil coating line by:	You must:
1. Limiting HAP or Volatile matter content of coatings	Determine the HAP or volatile matter and solids content of coating materials according to the procedures in §63.5160(b) and (c).
2. Using a capture system and add-on control device	Conduct a performance test for each capture and control system to determine: (1) the destruction or removal efficiency of each control device according to §63.5160(d), and (2) the capture efficiency of each capture system according to §63.5160(e).

(b) *Organic HAP content.* You must determine the organic HAP weight fraction of each coating material applied by following one of the procedures in paragraphs (b)(1) through (4) of this section:

(1) *Method 311.* You may test the material in accordance with Method 311 of appendix A of this part. The Method 311 determination may be performed by the manufacturer of the material and the results provided to you. The organic HAP content must be calculated according to the criteria and procedures in paragraphs (b)(1)(i) through (iii) of this section.

(i) Count only those organic HAP that are measured to be present at greater than or equal to 0.1 weight percent for Occupational Safety and Health Administration (OSHA)-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and greater than or equal to 1.0 weight percent for other organic HAP compounds.

(ii) Express the weight fraction of each organic HAP you count according to paragraph (b)(1)(i) of this section as a value truncated to four places after the decimal point (for example, 0.3791).

(iii) Calculate the total weight fraction of organic HAP in the tested material by summing the counted individual organic HAP weight fractions and truncating the result to three places after the decimal point (for example, 0.763).

(2) *Method 24.* For coatings, you may determine the total volatile matter content as weight fraction of nonaqueous volatile matter and use it as a substitute for organic HAP, using Method 24 of 40 CFR part 60, appendix A. The Method 24 determination may be performed by the manufacturer of the coating and the results provided to you.

(3) *Alternative method.* You may use an alternative test method for determining the organic HAP weight fraction once the Administrator has approved it. You must follow the procedure in §63.7(f) to submit an alternative test method for approval.

(4) *Formulation data.* You may use formulation data provided that the information represents each organic HAP present at a level equal to or greater than 0.1 percent for OSHA-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and equal to or greater than 1.0 percent for other organic HAP compounds in any raw material used, weighted by the mass fraction of each raw material used in the material. Formulation data may be provided to you by the manufacturer of the coating material. In the event of any inconsistency between test data obtained with the test methods specified in paragraphs (b)(1) through (3) of this section and formulation data, the test data will govern.

(c) *Solids content.* You must determine the solids content of each coating material applied. You may determine the volume solids content using ASTM D2697–86 (Reapproved 1998) or ASTM D6093–97

(incorporated by reference, see §63.14), or an EPA approved alternative method. The ASTM D2697–86 (Reapproved 1998) or ASTM D6093–97 determination may be performed by the manufacturer of the material and the results provided to you. Alternatively, you may rely on formulation data provided by material providers to determine the volume solids

(d) *Control device destruction or removal efficiency.* If you are using an add-on control device, such as an oxidizer, to comply with the standard in §63.5120, you must conduct a performance test to establish the destruction or removal efficiency of the control device or the outlet HAP concentration achieved by the oxidizer, according to the methods and procedures in paragraphs (d)(1) and (2) of this section. During the performance test, you must establish the operating limits required by §63.5121 according to paragraph (d)(3) of this section.

(1) An initial performance test to establish the destruction or removal efficiency of the control device must be conducted such that control device inlet and outlet testing is conducted simultaneously. To establish the outlet organic HAP concentration achieved by the oxidizer, only oxidizer outlet testing must be conducted. The data must be reduced in accordance with the test methods and procedures in paragraphs (d)(1)(i) through (ix).

(i) Method 1 or 1A of 40 CFR part 60, appendix A, is used for sample and velocity traverses to determine sampling locations.

(ii) Method 2, 2A, 2C, 2D, 2F, or 2G of 40 CFR part 60, appendix A, is used to determine gas volumetric flow rate.

(iii) Method 3, 3A, or 3B of 40 CFR part 60, appendix A, used for gas analysis to determine dry molecular weight. You may also use as an alternative to Method 3B, the manual method for measuring the oxygen, carbon dioxide, and carbon monoxide content of exhaust gas, ANSI/ASME PTC 19.10–1981, “Flue and Exhaust Gas Analyses” (incorporated by reference, see §63.14).

(iv) Method 4 of 40 CFR part 60, appendix A, is used to determine stack gas moisture.

(v) Methods for determining gas volumetric flow rate, dry molecular weight, and stack gas moisture must be performed, as applicable, during each test run, as specified in paragraph (d)(1)(vii) of this section.

(vi) Method 25 or 25A of 40 CFR part 60, appendix A, is used to determine total gaseous non-methane organic matter concentration. Use the same test method for both the inlet and outlet measurements, which must be conducted simultaneously. You must submit notification of the intended test method to the Administrator for approval along with notification of the performance test required under §63.7 (b). You must use Method 25A if any of the conditions described in paragraphs (d)(1)(vi)(A) through (D) of this section apply to the control device.

(A) The control device is not an oxidizer.

(B) The control device is an oxidizer, but an exhaust gas volatile organic matter concentration of 50 ppmv or less is required to comply with the standards in §63.5120; or

(C) The control device is an oxidizer, but the volatile organic matter concentration at the inlet to the control system and the required level of control are such that they result in exhaust gas volatile organic matter concentrations of 50 ppmv or less; or

(D) The control device is an oxidizer, but because of the high efficiency of the control device, the anticipated volatile organic matter concentration at the control device exhaust is 50 ppmv or less, regardless of inlet concentration.

(vii) Each performance test must consist of three separate runs, except as provided by §63.7(e)(3); each run must be conducted for at least 1 hour under the conditions that exist when the affected source is operating under normal operating conditions. For the purpose of determining volatile organic matter concentrations and mass flow rates, the average of the results of all runs will apply. If you are demonstrating initial compliance with the outlet organic HAP concentration limit in §63.5120(a)(3), only the average outlet volatile organic matter concentration must be determined.

(viii) If you are determining the control device destruction or removal efficiency, for each run, determine the volatile organic matter mass flow rates using Equation 1 of this section:

$$M_f = Q_{sd} C_C (12)(0.0416)\left(10^{-6}\right) \quad (Eq.\ 1)$$

Where:

M_f=total organic volatile matter mass flow rate, kg/per hour (h).

C_c=concentration of organic compounds as carbon in the vent gas, as determined by Method 25 or Method 25A, ppmv, dry basis.

Q_{sd}=volumetric flow rate of gases entering or exiting the control device, as determined by Method 2, 2A, 2C, 2D, 2F, or 2G, dry standard cubic meters (dscm)/h.

0.0416=conversion factor for molar volume, kg-moles per cubic meter (mol/m ^{3}) (@ 293 Kelvin (K) and 760 millimeters of mercury (mmHg)).

(ix) For each run, determine the control device destruction or removal efficiency, DRE, using Equation 2 of this section:

$$DRE = \frac{M_{fi} - M_{fo}}{M_{fi}} \times 100 \qquad (\text{Eq. } 2)$$

Where:

DRE=organic emissions destruction or removal efficiency of the add-on control device, percent.

M_{fi}=organic volatile matter mass flow rate at the inlet to the control device, kg/h.

M_{fo}=organic volatile matter mass flow rate at the outlet of the control device, kg/h.

(x) The control device destruction or removal efficiency is determined as the average of the efficiencies determined in the three test runs and calculated in Equation 2 of this section.

(2) You must record such process information as may be necessary to determine the conditions in existence at the time of the performance test. Operations during periods of start-up, shutdown, and malfunction will not constitute representative conditions for the purpose of a performance test.

(3) Operating limits. If you are using a capture system and add-on control device other than a solvent recovery system for which you conduct a liquid-liquid material balance to comply with the requirements in §63.5120, you must establish the applicable operating limits required by §63.5121. These operating limits apply to each capture system and to each add-on emission control device that is not monitored by CEMS, and you must establish the operating limits during the performance test required by paragraph (d) of this section according to the requirements in paragraphs (d)(3)(i) through (iii) of this section.

(i) *Thermal oxidizer.* If your add-on control device is a thermal oxidizer, establish the operating limits according to paragraphs (d)(3)(i)(A) and (B) of this section.

(A) During the performance test, you must monitor and record the combustion temperature at least once every 15 minutes during each of the three test runs. You must monitor the temperature in the firebox of the thermal oxidizer or immediately downstream of the firebox before any substantial heat exchange occurs.

(B) Use the data collected during the performance test to calculate and record the average combustion temperature maintained during the performance test. This average combustion temperature is the minimum operating limit for your thermal oxidizer.

(e) *Capture efficiency.* If you are required to determine capture efficiency to meet the requirements of §63.5170(e)(2), (f)(1) through (2), (h)(2) through (4), or (i)(2) through (3), you must determine capture efficiency using the procedures in paragraph (e)(1), (2), or (3) of this section, as applicable.

(1) For an enclosure that meets the criteria for a PTE, you may assume it achieves 100 percent capture efficiency. You must confirm that your capture system is a PTE by demonstrating that it meets the requirements of section 6 of EPA Method 204 of 40 CFR part 51, appendix M (or an EPA approved alternative method), and that all exhaust gases from the enclosure are delivered to a control device.

(2) You may determine capture efficiency, CE, according to the protocols for testing with temporary total

enclosures that are specified in Method 204A through F of 40 CFR part 51, appendix M. You may exclude never-controlled work stations from such capture efficiency determinations.

(3) As an alternative to the procedures specified in paragraphs (e)(1) and (2) of this section, if you are required to conduct a capture efficiency test, you may use any capture efficiency protocol and test methods that satisfy the criteria of either the Data Quality Objective or the Lower Confidence Limit approach as described in appendix A to subpart KK of this part. You may exclude never-controlled work stations from such capture efficiency determinations.

§ 63.5170 How do I demonstrate compliance with the standards?

You must include all coating materials (as defined in §63.5110) used in the affected source when determining compliance with the applicable emission limit in §63.5120. To make this determination, you must use at least one of the four compliance options listed in Table 1 of this section. You may apply any of the compliance options to an individual coil coating line, or to multiple lines as a group, or to the entire affected source. You may use different compliance options for different coil coating lines, or at different times on the same line. However, you may not use different compliance options at the same time on the same coil coating line. If you switch between compliance options for any coil coating line or group of lines, you must document this switch as required by §63.5190(a), and you must report it in the next semiannual compliance report required in §63.5180.

Table 1 to §63.5170—Compliance Demonstration Requirements Index

If you choose to demonstrate compliance by:	Then you must demonstrate that:
1. Use of “as purchased” compliant coatings	a. Each coating material used during the 12-month compliance period does not exceed 0.046 kg HAP per liter solids, as purchased. Paragraph (a) of this section.
2. Use of “as applied” compliant coatings	a. Each coating material used does not exceed 0.046 kg HAP per liter solids on a rolling 12-month average as applied basis, determined monthly. Paragraphs (b)(1) of this section; or
	b. Average of all coating materials used does not exceed 0.046 kg HAP per liter solids on a rolling 12-month average as applied basis, determined monthly. Paragraph (b)(2) of this section.
3. Use of a capture system and control device	Overall organic HAP control efficiency is at least 98 percent on a monthly basis for individual or groups of coil coating lines; or overall organic HAP control efficiency is at least 98 percent during initial performance test and operating limits are achieved continuously for individual coil coating lines; or oxidizer outlet HAP concentration is no greater than 20 ppmv and there is 100 percent capture efficiency during initial performance test and operating limits are achieved continuously for individual coil coating lines. Paragraph (c) of this section.
4. Use of a combination of compliant coatings and control devices and maintaining an acceptable equivalent emission rate	Average equivalent emission rate does not exceed 0.046 kg HAP per liter solids on a rolling 12-month average as applied basis, determined monthly. Paragraph (d) of this section.

(a) *As-purchased compliant coatings.* If you elect to use coatings that individually meet the organic HAP emission limit in §63.5120(a)(2) as-purchased, to which you will not add HAP during distribution or application, you must demonstrate that each coating material applied during the 12-month compliance period contains no more than 0.046 kg HAP per liter of solids on an as-purchased basis.

(1) Determine the organic HAP content for each coating material in accordance with §63.5160(b) and the volume solids content in accordance with §63.5160(c).

(2) Combine these results using Equation 1 of this section and compare the result to the organic HAP emission limit in §63.5120(a)(2) to demonstrate that each coating material contains no more organic HAP than the limit.

$$H_{siap} = \frac{C_{hi} D_i}{V_{si}} \qquad (Eq.\ 1)$$

Where:

H_{siap}= as-purchased, organic HAP to solids ratio of coating material, i, kg organic HAP/liter solids applied.

C_{hi}= organic HAP content of coating material, i, expressed as a weight-fraction, kg/kg.

D_i= density of coating material, i, kg/l.

Vsi = volume fraction of solids in coating, i, l/l.

(b) *As-applied compliant coatings.* If you choose to use "as-applied" compliant coatings, you must demonstrate that the average of each coating material applied during the 12-month compliance period contains no more than 0.046 kg of organic HAP per liter of solids applied in accordance with (b)(1) of this section, or demonstrate that the average of all coating materials applied during the 12-month compliance period contain no more than 0.046 kg of organic HAP per liter of solids applied in accordance with paragraph (b)(2) of this section.

(1) To demonstrate that the average organic HAP content on the basis of solids applied for each coating material applied, $H_{Si\ yr}$, is less than 0.046 kg HAP per liter solids applied for the 12-month compliance period, use Equation 2 of this section:

$$H_{Si\ yr} = \frac{\sum_{y=1}^{12}\left[V_i D_i C_{ahi} + \sum_{i=1}^{q} V_j D_j C_{hij}\right]}{\sum_{y=1}^{12} V_i V_{si}} \qquad (Eq.\ 2)$$

Where:

$H_{si\ yr}$= average for the 12-month compliance period, as-applied, organic HAP to solids ratio of material, i, kg organic HAP/liter solids applied.

V_i= volume of coating material, i, l.

D_i= density of coating material, i, kg/l.

C_{ahi}= monthly average, as-applied, organic HAP content of solids-containing coating material, i, expressed as a weight fraction, kilogram (kg)/kg.

V_j= volume of solvent, j, l.

D_j= density of solvent, j, kg/l.

C_{hij}= organic HAP content of solvent, j, added to coating material, i, expressed as a weight fraction, kg/kg.

V_{si}= volume fraction of solids in coating, i, l/l.

y = identifier for months.

q = number of different solvents, thinners, reducers, diluents, or other non-solids-containing coating materials applied in a month.

(2) To demonstrate that the average organic HAP content on the basis of solids applied, $H_{S\ yr}$, of all coating materials applied is less than 0.046 kg HAP per liter solids applied for the 12-month compliance period, use Equation 3 of this section:

$$H_{S\,yr} = \frac{\sum_{y=1}^{12}\left[\sum_{i=1}^{p} V_i D_i C_{aki} + \sum_{j=1}^{q} V_j D_j C_{hij}\right]}{\sum_{y=1}^{12}\left[\sum_{i=1}^{p} V_i V_{si}\right]} \qquad \text{(Eq. 3)}$$

Where:

$H_{S\,yr}$= average for the 12-month compliance period, as-applied, organic HAP to solids ratio of all materials applied, kg organic HAP/liter solids applied.

Vi = volume of coating material, i, l.

D_i= density of coating material, i, kg/l.

C_{ahi}= monthly average, as-applied, organic HAP content of solids-containing coating material, i, expressed as a weight fraction, kilogram (kg)/kg.

Vj = volume of solvent, j, l.

D_j= density of solvent, j, kg/l.

C_{hij}= organic HAP content of solvent, j, added to coating material, i, expressed as a weight fraction, kg/kg.

Vsi = volume fraction of solids in coating, i, l/l.

p = number of different coating materials applied in a month.

q = number of different solvents, thinners, reducers, diluents, or other non-solids-containing coating materials applied in a month.

y = identifier for months.

(c) *Capture and control to reduce emissions to no more than the allowable limit.* If you use one or more capture systems and one or more control devices and demonstrate an average overall organic HAP control efficiency of at least 98 percent for each month to comply with §63.5120(a)(1); or operate a capture system and oxidizer so that the capture efficiency is 100 percent and the oxidizer outlet HAP concentration is no greater than 20 ppmv on a dry basis to comply with §63.5120(a)(3), you must follow one of the procedures in paragraphs (c)(1) through (4) of this section. Alternatively, you may demonstrate compliance for an individual coil coating line by operating its capture system and control device and continuous parameter monitoring system according to the procedures in paragraph (i) of this section.

(3) If the affected source operates both solvent recovery and oxidizer control devices, one or more never-controlled work stations, or one or more intermittently-controllable work stations, or uses more than one compliance procedure, then you must demonstrate compliance with the provisions of paragraph (g) of this section.

(d) *Capture and control to achieve the emission rate limit.* If you use one or more capture systems and one or more control devices and limit the organic HAP emission rate to no more than 0.046 kg organic HAP emitted per liter of solids applied on a 12-month average as-applied basis, then you must follow one of the procedures in paragraphs (d)(1) through (3) of this section.

(2) If you use one or more oxidizers, you must demonstrate compliance with the provisions in paragraph (f) of this section.

(f) *Use of oxidation to demonstrate compliance.* If you use one or more oxidizers to control emissions from always controlled work stations, you must follow the procedures in either paragraph (f)(1) or (2) of this section:

(1) *Continuous monitoring of capture system and control device operating parameters.* Demonstrate initial compliance through performance tests of capture efficiency and control device efficiency and continuing compliance through continuous monitoring of capture system and control device operating parameters as specified in paragraphs (f)(1)(i) through (xi) of this section:

(i) For each oxidizer used to comply with §63.5120(a), determine the oxidizer destruction or removal efficiency, DRE, using the procedure in §63.5160(d).

(ii) Whenever a work station is operated, continuously monitor the operating parameter established in accordance with §63.5150(a)(3).

(iii) Determine the capture system capture efficiency, CE, for each work station in accordance with §63.5160(e).

(iv) Whenever a work station is operated, continuously monitor the operating parameter established in accordance with §63.5150(a)(4).

(v) Calculate the overall organic HAP control efficiency, R, achieved using Equation 7 of this section.

(vi) If demonstrating compliance with the organic HAP emission rate based on solids applied, measure the mass of each coating material applied on each work station during the month.

(vii) If demonstrating compliance with the organic HAP emission rate based on solids applied, determine the organic HAP content of each coating material applied during the month following the procedure in §63.5160(b).

(viii) If demonstrating compliance with the organic HAP emission rate based on solids applied, determine the solids content of each coating material applied during the month following the procedure in §63.5160(c).

(ix) Calculate the organic HAP emitted during the month, H_e, for each month:

(A) For each work station and its associated oxidizer, use Equation 8 of this section.

(B) For periods when the oxidizer has not operated within its established operating limit, the control device efficiency is determined to be zero.

(g) *Combination of capture and control.* You must demonstrate compliance according to the procedures in paragraphs (g)(1) through (8) of this section if both solvent recovery and oxidizer control devices, one or more never controlled coil coating stations, or one or more intermittently controllable coil coating stations are operated; or more than one compliance procedure is used.

(3) *Oxidizer using performance test and continuous monitoring of operating parameters compliance demonstration.* For each oxidizer used to control emissions from one or more work stations for which you choose to demonstrate compliance through performance tests of capture efficiency, control device efficiency, and continuing compliance through continuous monitoring of capture system and control device operating parameters, each month of the 12-month compliance period you must meet the requirements of paragraphs (g)(3)(i) through (iii) of this section:

(i) Monitor an operating parameter established in §63.5150(a)(3) to ensure that control device destruction or removal efficiency is maintained; and

(ii) For each capture system delivering emissions to that oxidizer, monitor an operating parameter established in §63.5150(a)(4) to ensure capture efficiency; and

(iii) Determine the organic HAP emissions for those work stations served by each capture system delivering emissions to that oxidizer according to either paragraph (g)(3)(iii)(A) or (B) of this section:

(A) In accordance with paragraphs (f)(1)(i) through (v) and (ix) of this section if the work stations served by that capture system are only always-controlled work stations; or

(6) If demonstrating compliance with the organic HAP emission rate based on solids applied, each month of the 12-month compliance period you must determine the solids content of each coating material applied during the month following the procedure in §63.5160(c).

(7) *Organic HAP emitted.* You must determine the organic HAP emissions for the affected source for each 12-month compliance period by summing all monthly organic HAP emissions calculated according to paragraphs (g)(1), (g)(2)(ii), (g)(3)(iii), (g)(4)(ii), and (g)(5) of this section.

(8) *Compare actual performance to performance required by compliance option.* The affected source is in compliance with §63.5120(a) for the 12-month compliance period if all operating parameters required to be monitored under paragraphs (g)(2) through (4) of this section were maintained at the values established in

§63.5150; and it meets the requirement in either paragraph (g)(8)(i) or (ii) of this section.

(i) The total mass of organic HAP emitted by the affected source was not more than 0.046 kg HAP per liter of solids applied for the 12-month compliance period; or

(ii) The total mass of organic HAP emitted by the affected source was not more than 2 percent of the total mass of organic HAP applied by the affected source each month. You must determine the total mass of organic HAP applied by the affected source in each month of the 12-month compliance period using Equation 9 of this section.

(i) *Capture and control system compliance demonstration procedures using a CPMS for a coil coating line.* If you use an add-on control device, to demonstrate initial compliance for each capture system and each control device through performance tests and continuing compliance through continuous monitoring of capture system and control device operating parameters, you must meet the requirements in paragraphs (i)(1) through (3) of this section.

(1) Conduct an initial performance test to determine the control device destruction or removal efficiency, DRE, using the applicable test methods and procedures in §63.5160(d).

(2) Determine the emission capture efficiency, CE, in accordance with §63.5160(e).

(3) Whenever a coil coating line is operated, continuously monitor the operating parameters established according to §63.5150(a)(3) and (4) to ensure capture and control efficiency.

Reporting and Recordkeeping

§ 63.5180 What reports must I submit?

(a) Submit the reports specified in paragraphs (b) through (i) of this section to the EPA Regional Office that serves the State or territory in which the affected source is located and to the delegated State agency:

(b)(3) For the purpose of this subpart, a title V permit application may be used in lieu of the initial notification required under §63.9(b), provided the same information is contained in the permit application as required by §63.9(b), and the State to which the permit application has been submitted has an approved operating permit program under part 70 of this chapter and has received delegation of authority from the EPA.

(4) Submit a title V permit application used in lieu of the initial notification required under §63.9(b) by the same due dates as those specified in paragraphs (b)(1) and (2) of this section for the initial notifications.

(c) You must submit a Notification of Performance Test as specified in §§63.7 and 63.9(e) if you are complying with the emission standard using a control device. This notification and the site-specific test plan required under §63.7(c)(2) must identify the operating parameter to be monitored to ensure that the capture efficiency measured during the performance test is maintained. You may consider the operating parameter identified in the site-specific test plan to be approved unless explicitly disapproved, or unless comments received from the Administrator require monitoring of an alternate parameter.

(d) You must submit a Notification of Compliance Status as specified in §63.9(h). You must submit the Notification of Compliance Status no later than 30 calendar days following the end of the initial 12-month compliance period described in §63.5130.

(e) You must submit performance test reports as specified in §63.10(d)(2) if you are using a control device to comply with the emission standards and you have not obtained a waiver from the performance test requirement.

(f) You must submit start-up, shutdown, and malfunction reports as specified in §63.10(d)(5) if you use a control device to comply with this subpart.

(1) If your actions during a start-up, shutdown, or malfunction of an affected source (including actions taken to correct a malfunction) are not completely consistent with the procedures specified in the source's start-up, shutdown, and malfunction plan specified in §63.6(e)(3), you must state such information in the report. The start-up, shutdown, or malfunction report will consist of a letter containing the name, title, and signature of the responsible official who is certifying its accuracy, that will be submitted to the Administrator.

(2) Separate start-up, shutdown, or malfunction reports are not required if the information is included in the report specified in paragraph (g) of this section.

(g) You must submit semi-annual compliance reports containing the information specified in paragraphs (g)(1) and (2) of this section.

(1) Compliance report dates.

(i) The first semiannual reporting period begins 1 day after the end of the initial compliance period described in §63.5130(d) that applies to your affected source and ends 6 months later.

(ii) The first semiannual compliance report must cover the first semiannual reporting period and be postmarked or delivered no later than 30 days after the reporting period ends.

(iii) Each subsequent compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31.

(iv) Each subsequent compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period.

(v) For each affected source that is subject to permitting regulations pursuant to 40 CFR part 70 or part 71, and the permitting authority has established dates for submitting semiannual reports pursuant to 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), you may submit the first and subsequent compliance reports according to the dates the permitting authority has established instead of according to the dates in paragraphs (g)(1)(i) through (iv) of this section.

(2) The semi-annual compliance report must contain the following information:

(i) Company name and address.

(ii) Statement by a responsible official with that official's name, title, and signature, certifying the accuracy of the content of the report.

(iii) Date of report and beginning and ending dates of the reporting period. The reporting period is the 6-month period ending on June 30 or December 31. Note that the information reported for each of the 6 months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation.

(iv) Identification of the compliance option or options specified in Table 1 to §63.5170 that you used on each coating operation during the reporting period. If you switched between compliance options during the reporting period, you must report the beginning dates you used each option.

(v) A statement that there were no deviations from the standards during the reporting period, and that no CEMS were inoperative, inactive, malfunctioning, out-of-control, repaired, or adjusted.

(h) You must submit, for each deviation occurring at an affected source where you are not using CEMS to comply with the standards in this subpart, the semi-annual compliance report containing the information in paragraphs (g)(2)(i) through (iv) of this section and the information in paragraphs (h)(1) through (3) of this section:

(1) The total operating time of each affected source during the reporting period.

(2) Information on the number, duration, and cause of deviations (including unknown cause, if applicable) as applicable, and the corrective action taken.

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

[67 FR 39812, June 10, 2002, as amended at 68 FR 12592, Mar. 17, 2003]

§ 63.5190 What records must I maintain?

(a) You must maintain the records specified in paragraphs (a) and (b) of this section in accordance with §63.10(b)(1):

(1) Records of the coating lines on which you used each compliance option and the time periods (beginning and ending dates and times) you used each option.

(2) Records specified in §63.10(b)(2) of all measurements needed to demonstrate compliance with this subpart, including:

(ii) Control device and capture system operating parameter data in accordance with §63.5150(a)(1), (3), and (4);

(iii) Organic HAP content data for the purpose of demonstrating compliance in accordance with §63.5160(b);

(iv) Volatile matter and solids content data for the purpose of demonstrating compliance in accordance with §63.5160(c);

(v) Overall control efficiency determination or alternative outlet HAP concentration using capture efficiency tests and control device destruction or removal efficiency tests in accordance with §63.5160(d), (e), and (f); and

(vi) Material usage, HAP usage, volatile matter usage, and solids usage and compliance demonstrations using these data in accordance with §63.5170(a), (b), and (d);

(3) Records specified in §63.10(b)(3); and

(4) Additional records specified in §63.10(c) for each continuous monitoring system operated by the owner or operator in accordance with §63.5150(a)(2).

Delegation of Authority

§ 63.5200 What authorities may be delegated to the States?

(a) This subpart can be implemented and enforced by us, the EPA, or a delegated authority such as your State, local, or tribal agency. If the EPA Administrator has delegated authority to your State, local, or tribal agency, then that agency has the authority to implement and enforce this subpart. You should contact your EPA Regional Office to find out if this subpart is delegated to your State, local, or tribal agency.

(b) In delegating implementation and enforcement authority of this subpart to a State, local, or tribal agency under section 40 CFR part 63, subpart E, the authorities contained in paragraph (c) of this section are retained by the EPA Administrator and not transferred to the State, local, or tribal agency.

(c) Authority which will not be delegated to States, local, or tribal agencies:

(1) Approval of alternatives to the emission limitations in §63.5120;

(2) Approval of major alternatives to test methods under §63.7(e)(2)(ii) and (f) and as defined in §63.5160;

(3) Approval of major alternatives to monitoring under §63.8(f) and as defined in §63.5150; and

(4) Approval of major alternatives to recordkeeping and reporting under §63.10(f) and as defined in §§63.5180 and 63.5190.

§§63.5201 and 63.5209 [Reserved]

Table 1 to Subpart SSSS of Part 63-Operating Limits if Using Add-on Control Devices and Capture System

For the following device . . .	You must meet the following operating limit . . .	And you must demonstrate continuous compliance with the operating limit by . . .
1. thermal oxidizer.....	a. the average combustion temperature in any 3-hour period	i. collecting the combustion temperature data according to

	must not fall below the combustion temperature limit established according to § 63.5160(d)(3)(i).	§ 63.5150(a)(3); ii. reducing the data to 3-hour block averages; and iii. maintaining the 3-hour average combustion temperature at or above the temperature limit.
3. emission capture system.....	develop a monitoring plan that identifies operating parameter to be monitored and specifies operating limits according to § 63.5150(a)(4).	conducting monitoring according to the plan § 63.5150(a)(4).

Table 2 to Subpart SSSS of Part 63-Applicability of General Provisions to Subpart SSSS

General provisions reference	Applicable to subpart SSSS	Explanation
§ 63.1(a)(1)-(4)	Yes	
§ 63.1(a)(5)	No	Reserved.
§ 63.1(a)(6)-(8)	Yes	
§ 63.1(a)(9)	No	Reserved.
§ 63.1(a)(10)-(14)	Yes	
§ 63.1(b)(1)	No	Subpart SSSS specifies applicability.
§ 63.1(b)(2)-(3)	Yes	
§ 63.1(c)(1)	Yes	
§ 63.1(c)(2)	Yes	
§ 63.1(c)(3)	No	Reserved.
§ 63.1(c)(4)	Yes	
§ 63.1(c)(5)	Yes	
§ 63.1(d)	No	Reserved.
§ 63.1(e)	Yes	
§ 63.2	Yes	Additional definitions in subpart SSSS.
§ 63.3(a)-(c)	Yes	
§ 63.4(a)(1)-(3)	Yes	
§ 63.4(a)(4)	No	Reserved.
§ 63.4(a)(5)	Yes	
§ 63.4(b)-(c)	Yes	
§ 63.5(a)(1)-(2)	Yes	
§ 63.5(b)(1)	Yes	
§ 63.5(b)(2)	No	Reserved.
§ 63.5(b)(3)-(6)	Yes	
§ 63.5(c)	No	Reserved.
§ 63.5(d)	Yes	Only total HAP emissions in terms of tons per year are required for § 63.5(d)(1)(ii)(H).
§ 63.5(e)	Yes	
§ 63.5(f)	Yes	
§ 63.6(a)	Yes	
§ 63.6(b)(1)-(5)	Yes	
§ 63.6(b)(6)	No	Reserved.
§ 63.6(b)(7)	Yes	
§ 63.6(c)(1)-(2)	Yes	
§ 63.6(c)(3)-(4)	No	Reserved.
§ 63.6(c)(5)	Yes	
§ 63.6(d)	No	Reserved.
§ 63.6(e)	Yes	Provisions in § 63.6(e)(3) pertaining to startups, shutdowns, malfunctions, and CEMS only apply if an add-on control system is used.
§ 63.6(f)	Yes	
§ 63.6(g)	Yes	
§ 63.6(h)	No	Subpart SSSS does not require continuous opacity monitoring

		systems (COMS).
§ 63.6(i)(1)-(14).....	Yes.....	
§ 63.6(i)(15).....	No.....	Reserved.
§ 63.6(i)(16).....	Yes.....	
§ 63.6(j).....	Yes.....	
§ 63.7.....	Yes.....	With the exception of § 63.7(a)(2)(vii) and (viii), which are reserved.
§ 63.8(a)(1)-(2).....	Yes.....	
§ 63.8(a)(3).....	No.....	Reserved.
§ 63.8(a)(4).....	Yes.....	
§ 63.8(b).....	Yes.....	
§ 63.8(c)(1)-(3).....	Yes.....	Provisions only apply if an add-on control system is used.
§ 63.8(c)(4).....	No.....	
§ 63.8(c)(5).....	No.....	Subpart SSSS does not require COMS.
§ 63.8(c)(6).....	Yes.....	Provisions only apply if CEMS are used.
§ 63.8(c)(7)-(8).....	Yes.....	
§ 63.8(d)-(e).....	Yes.....	Provisions only apply if CEMS are used.
§ 63.8(f)(1)-(5).....	Yes.....	
§ 63.8(f)(6).....	No.....	Section 63.8(f)(6) provisions are not applicable because subpart SSSS does not require CEMS.
§ 63.8(g)(1)-(4).....	Yes.....	
§ 63.8(g)(5).....	No.....	
§ 63.9(a).....	Yes.....	
§ 63.9(b)(1).....	Yes.....	
§ 63.9(b)(2).....	Yes.....	With the exception that § 63.5180(b)(1) provides 2 years after the proposal date for submittal of the initial notification.
§ 63.9(b)(3)-(5).....	Yes.....	
§ 63.9(c)-(e).....	Yes.....	
§ 63.9(f).....	No.....	Subpart SSSS does not require opacity and visible emissions observations.
§ 63.9(g).....	No.....	Provisions for COMS are not applicable.
§ 63.9(h)(1)-(3).....	Yes.....	
§ 63.9(h)(4).....	No.....	Reserved.
§ 63.9(h)(5)-(6).....	Yes.....	
§ 63.9(i).....	Yes.....	
§ 63.9(j).....	Yes.....	
§ 63.10(a).....	Yes.....	
§ 63.10(b)(1)-(3).....	Yes.....	Provisions pertaining to startups, shutdowns, malfunctions, and maintenance of air pollution control equipment and to CEMS do not apply

		unless an add-on control system is used. Also, paragraphs (b)(2)(vi), (x), (xi), and (xiii) do not apply.
§ 63.10(c)(1).....	No.....	
§ 63.10(c)(2)-(4).....	No.....	Reserved.
§ 63.10(c)(5)-(8).....	No.....	
§ 63.10(c)(9).....	No.....	Reserved.
§ 63.10(c)(10)-(15).....	No.....	
§ 63.10(d)(1)-(2).....	Yes.....	
§ 63.10(d)(3).....	No.....	Subpart SSSS does not require opacity and visible emissions observations.
§ 63.10(d)(4)-(5).....	Yes.....	
§ 63.10(e).....	No.....	
§ 63.10(f).....	Yes.....	
§ 63.11.....	Yes.....	
§ 63.12.....	Yes.....	
§ 63.13.....	Yes.....	
§ 63.14.....	Yes.....	Subpart SSSS includes provisions for alternative ASTM and ASME test methods that are incorporated by reference.
§ 63.15.....	Yes.....	

SECTION E.3 FACILITY OPERATION CONDITIONS

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

(b) One (1) metal coil coating line, identified as Line 2, with a maximum throughput of 300 gallons of solvent per hour, using one (1) thermal oxidizer as control, and consisting of the following equipment:

(1) One (1) wet section and brush, constructed in 1964, exhausting to stack 1;

(2) Cooling towers, constructed in October 1993, exhausting to stack 2;

(3) Cooling towers, constructed in October 1993, exhausting to stack 3;

(4) One (1) thermal oxidizer stack (via heat exchanger), constructed in September 1995, identified as stack 4A;

(5) One (1) thermal oxidizer stack, constructed in September 1995, identified as stack 4B;

(6) One (1) prime coater room, constructed in 1964, utilizing rollcoating, exhausting to stack 5;

(7) One (1) finish coater room, constructed in 1964, utilizing rollcoating, exhausting to stack 6;

(8) One (1) finish quench, constructed in 1964, exhausting to stack 7;

(9) One (1) air knife exhaust, constructed in 1964, identified as stack 20.

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

E.3.1 General Provisions Relating to New Source Performance Standards [326 IAC 12-1] [40 CFR Part 60, Subpart A]

(a) Pursuant to 40 CFR 60.1, the Permittee shall comply with the provisions of 40 CFR Part 60 Subpart A – General Provisions, which are incorporated by reference as 326 IAC 12-1 for the prime coater and finish coater (Line 2) in 40 CFR Part 60, Subpart TT.

(b) Pursuant to 40 CFR 60.19, the Permittee shall submit all required notifications and reports to:

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

E.3.2 Standard of Performance for Metal Coil Surface Coating Requirements [40 CFR Part 60, Subpart TT]

Pursuant to 40 CFR Part 60, Subpart TT, the Permittee shall comply with the provisions of Standard of Performance for Metal Coil Surface Coating, which are incorporated by reference as 326 IAC 12, for the prime coater and finish coater (Line 2) as follows:

Subpart TT-Standards of Performance for Metal Coil Surface Coating

Source: 47 FR 49612, Nov. 1, 1982, unless otherwise noted.

§ 60.460 Applicability and designation of affected facility.

(a) The provisions of this subpart apply to the following affected facilities in a metal coil surface coating operation: each prime coat operation, each finish coat operation, and each prime and finish coat operation combined when the finish coat is applied wet on wet over the prime coat and both coatings are cured simultaneously.

(b) This subpart applies to any facility identified in paragraph (a) of this section that commences construction, modification, or reconstruction after January 5, 1981.

§ 60.461 Definitions.

(a) All terms used in this subpart not defined below are given the same meaning as in the Act or in subpart A of this part.

Coating means any organic material that is applied to the surface of metal coil.

Coating application station means that portion of the metal coil surface coating operation where the coating is applied to the surface of the metal coil. Included as part of the coating application station is the flashoff area between the coating application station and the curing oven.

Curing oven means the device that uses heat or radiation to dry or cure the coating applied to the metal coil.

Finish coat operation means the coating application station, curing oven, and quench station used to apply and dry or cure the final coating(s) on the surface of the metal coil. Where only a single coating is applied to the metal coil, that coating is considered a finish coat.

Metal coil surface coating operation means the application system used to apply an organic coating to the surface of any continuous metal strip with thickness of 0.15 millimeter (mm) (0.006 in.) or more that is packaged in a roll or coil.

Prime coat operation means the coating application station, curing oven, and quench station used to apply and dry or cure the initial coating(s) on the surface of the metal coil.

Quench station means that portion of the metal coil surface coating operation where the coated metal coil is cooled, usually by a water spray, after baking or curing.

VOC content means the quantity, in kilograms per liter of coating solids, of volatile organic compounds (VOC's) in a coating.

(b) All symbols used in this subpart not defined below are given the same meaning as in the Act and in subpart A of this part.

C_a= the VOC concentration in each gas stream leaving the control device and entering the atmosphere (parts per million by volume, as carbon).

C_b= the VOC concentration in each gas stream entering the control device (parts per million by volume, as carbon).

C_f= the VOC concentration in each gas steam emitted directly to the atmosphere (parts per million by volume, as carbon).

D_c= density of each coating, as received (kilograms per liter).

D_d= density of each VOC-solvent added to coatings (kilograms per liter).

D_r= density of VOC-solvent recovered by an emission control device (kilograms per liter).

E= VOC destruction efficiency of the control device (fraction).

F= the proportion of total VOC's emitted by an affected facility that enters the control device (fraction).

G= volume-weighted average mass of VOC's in coatings consumed in a calendar month per unit volume of coating solids applied (kilograms per liter).

L_c= the volume of each coating consumed, as received (liters).

L_d= the volume of each VOC-solvent added to coatings (liters).

L_r= the volume of VOC-solvent recovered by an emission control device (liters).

L_s= the volume of coating solids consumed (liters).

M_d= the mass of VOC-solvent added to coatings (kilograms).

M_o= the mass of VOC's in coatings consumed, as received (kilograms).

M_r= the mass of VOC's recovered by an emission control device (kilograms).

N= the volume-weighted average mass of VOC emissions to the atmosphere per unit volume of coating solids applied (kilograms per liter).

Q_a= the volumetric flow rate of each gas stream leaving the control device and entering the atmosphere (dry standard cubic meters per hour).

Q_b= the volumetric flow rate of each gas stream entering the control device (dry standard cubic meters per hour).

Q_f= the volumetric flow rate of each gas steam emitted directly to the atmosphere (dry standard cubic meters per hour).

R= the overall VOC emission reduction achieved for an affected facility (fraction).

S= the calculated monthly allowable emission limit (kilograms of VOC per liter of coating solids applied).

V_s= the proportion of solids in each coating, as received (fraction by volume).

W_o= the proportion of VOC's in each coating, as received (fraction by weight).

§ 60.462 Standards for volatile organic compounds.

(a) On and after the date on which §60.8 requires a performance test to be completed, each owner or operator subject to this subpart shall not cause to be discharged into the atmosphere more than:

(1) 0.28 kilogram VOC per liter (kg VOC/ *l*) of coating solids applied for each calendar month for each affected facility that does not use an emission control device(s); or

(2) 0.14 kg VOC/*l* of coating solids applied for each calendar month for each affected facility that continuously uses an emission control device(s) operated at the most recently demonstrated overall efficiency; or

(3) 10 percent of the VOC's applied for each calendar month (90 percent emission reduction) for each affected facility that continuously uses an emission control device(s) operated at the most recently demonstrated overall efficiency; or

(4) A value between 0.14 (or a 90-percent emission reduction) and 0.28 kg VOC/ *l* of coating solids applied for each calendar month for each affected facility that intermittently uses an emission control device operated at the most recently demonstrated overall efficiency.

§ 60.463 Performance test and compliance provisions.

(a) Section 60.8(d) and (f) do not apply to the performance test.

(b) The owner or operator of an affected facility shall conduct an initial performance test as required under §60.8(a) and thereafter a performance test for each calendar month for each affected facility according to the procedures in this section.

(c) The owner or operator shall use the following procedures for determining monthly volume-weighted average emissions of VOC's in kg/*l* of coating solids applied.

(1) An owner or operator shall use the following procedures for each affected facility that does not use a capture system and control device to comply with the emission limit specified under §60.462(a)(1). The owner or operator shall determine the composition of the coatings by formulation data supplied by the manufacturer of the coating or by an analysis of each coating, as received, using Method 24. The Administrator may require the owner or operator who uses formulation data supplied by the manufacturer of the coatings to determine the VOC content of coatings using Method 24 or an equivalent or alternative method. The owner or operator shall determine the volume of coating and the mass of VOC-solvent added to coatings from company records on a monthly basis. If a common coating distribution system serves more than one affected facility or serves both affected and existing facilities, the owner or operator shall

estimate the volume of coating used at each affected facility by using the average dry weight of coating and the surface area coated by each affected and existing facility or by other procedures acceptable to the Administrator.

(i) Calculate the volume-weighted average of the total mass of VOC's consumed per unit volume of coating solids applied during each calendar month for each affected facility, except as provided under paragraph (c)(1)(iv) of this section. The weighted average of the total mass of VOC's used per unit volume of coating solids applied each calendar month is determined by the following procedures.

(A) Calculate the mass of VOC's used (Mo+Md) during each calendar month for each affected facility by the following equation:

$$M_o + M_d = \sum_{i=1}^{n} L_{ci} D_{ci} W_{oi} + \sum_{j=1}^{m} L_{dj} D_{dj} \qquad Equation\ 1$$

($\Sigma L_{dj} D_{dj}$ will be 0 if no VOC solvent is added to the coatings, as received)

where

n is the number of different coatings used during the calendar month, and

m is the number of different VOC solvents added to coatings used during the calendar month.

(B) Calculate the total volume of coating solids used (L_s) in each calendar month for each affected facility by the following equation:

$$L_s = \sum_{i=1}^{n} V_{si} L_{ci} \qquad Equation\ 2$$

Where:

n is the number of different coatings used during the calendar month.

(C) Calculate the volume-weighted average mass of VOC's used per unit volume of coating solids applied (G) during the calendar month for each affected facility by the following equation:

$$G = \frac{M_o + M_d}{L_s} \qquad Equation\ 3$$

(ii) Calculate the volume-weighted average of VOC emissions to the atmosphere (N) during the calendar month for each affected facility by the following equation:

$$N = G \qquad Equation\ 4$$

(iii) Where the volume-weighted average mass of VOC's discharged to the atmosphere per unit volume of coating solids applied (N) is equal to or less than 0.28 kg/ *l,* the affected facility is in compliance.

(iv) If each individual coating used by an affected facility has a VOC content, as received, that is equal to or less than 0.28 kg/ *l* of coating solids, the affected facility is in compliance provided no VOC's are added to the coatings during distribution or application.

(2) An owner or operator shall use the following procedures for each affected facility that continuously uses a capture system and a control device that destroys VOC's (e.g., incinerator) to comply with the emission limit specified under §60.462(a) (2) or (3).

(i) Determine the overall reduction efficiency (R) for the capture system and control device.

For the initial performance test, the overall reduction efficiency (R) shall be determined as prescribed in paragraphs (c)(2)(i) (A), (B), and (C) of this section. In subsequent months, the owner or operator may use the most recently determined overall reduction efficiency (R) for the performance test, providing control device and capture system operating conditions have not changed. The procedure in paragraphs (c)(2)(i) (A), (B), and (C) of this section, shall be repeated when directed by the Administrator or when the owner or operator elects to operate the control device or capture system at conditions different from the initial

performance test.

(A) Determine the fraction (F) of total VOC's emitted by an affected facility that enters the control device using the following equation:

$$F = \frac{\sum_{i=1}^{l} C_{ai} Q_{ai}}{\sum_{i=1}^{l} C_{ai} Q_{ai} + \sum_{i=1}^{p} C_{fi} Q_{fi}}$$

Equation 5

Where:

l is the number of gas streams entering the control device, and

p is the number of gas streams emitted directly to the atmosphere.

(B) Determine the destruction efficiency of the control device (E) using values of the volumetric flow rate of each of the gas streams and the VOC content (as carbon) of each of the gas streams in and out of the device by the following equation:

$$E = \frac{\sum_{i=1}^{n} Q_{bi} C_{bi} - \sum_{j=1}^{m} Q_{aj} C_{aj}}{\sum_{i=1}^{n} Q_{bi} C_{bi}}$$

Equation 6

Where:

n is the number of gas streams entering the control device, and

m is the number of gas streams leaving the control device and entering the atmosphere.

The owner or operator of the affected facility shall construct the VOC emission reduction system so that all volumetric flow rates and total VOC emissions can be accurately determined by the applicable test methods and procedures specified in §60.466. The owner or operator of the affected facility shall construct a temporary enclosure around the coating applicator and flashoff area during the performance test for the purpose of evaluating the capture efficiency of the system. The enclosure must be maintained at a negative pressure to ensure that all VOC emissions are measurable. If a permanent enclosure exists in the affected facility prior to the performance test and the Administrator is satisfied that the enclosure is adequately containing VOC emissions, no additional enclosure is required for the performance test.

(C) Determine overall reduction efficiency (R) using the following equation:

$$R = EF \qquad \text{Equation 7}$$

If the overall reduction efficiency (R) is equal to or greater than 0.90, the affected facility is in compliance and no further computations are necessary. If the overall reduction efficiency (R) is less than 0.90, the average total VOC emissions to the atmosphere per unit volume of coating solids applied (N) shall be computed as follows.

(ii) Calculate the volume-weighted average of the total mass of VOC's per unit volume of coating solids applied (G) during each calendar month for each affected facility using equations in paragraphs (c)(1)(i) (A), (B), and (C) of this section.

(iii) Calculate the volume-weighted average of VOC emissions to the atmosphere (N) during each calendar month by the following equation:

$$N = G(1 - R) \qquad \text{Equation 8}$$

(iv) If the volume-weighted average mass of VOC's emitted to the atmosphere for each calendar month (N) is less than or equal to 0.14 kg/*l* of coating solids applied, the affected facility is in compliance. Each monthly calculation is a performance test.

[47 FR 49612, Nov. 1, 1982; 48 FR 1056, Jan. 10, 1983, as amended at 65 FR 61761, Oct. 17, 2000]

§ 60.464 Monitoring of emissions and operations.

(a) Where compliance with the numerical limit specified in §60.462(a) (1) or (2) is achieved through the use of low VOC-content coatings without the use of emission control devices or through the use of higher VOC-content coatings in conjunction with emission control devices, the owner or operator shall compute and record the average VOC content of coatings applied during each calendar month for each affected facility, according to the equations provided in §60.463.

(b) Where compliance with the limit specified in §60.462(a)(4) is achieved through the intermittent use of emission control devices, the owner or operator shall compute and record for each affected facility the average VOC content of coatings applied during each calendar month according to the equations provided in §60.463.

(c) If thermal incineration is used, each owner or operator subject to the provisions of this subpart shall install, calibrate, operate, and maintain a device that continuously records the combustion temperature of any effluent gases incinerated to achieve compliance with §60.462(a)(2), (3), or (4). This device shall have an accuracy of ±2.5 °C. or ±0.75 percent of the temperature being measured expressed in degrees Celsius, whichever is greater. Each owner or operator shall also record all periods (during actual coating operations) in excess of 3 hours during which the average temperature in any thermal incinerator used to control emissions from an affected facility remains more than 28 °C (50 °F) below the temperature at which compliance with §60.462(a)(2), (3), or (4) was demonstrated during the most recent measurement of incinerator efficiency required by §60.8. The records required by §60.7 shall identify each such occurrence and its duration. If catalytic incineration is used, the owner or operator shall install, calibrate, operate, and maintain a device to monitor and record continuously the gas temperature both upstream and downstream of the incinerator catalyst bed. This device shall have an accuracy of ±2.5 °C. or ±0.75 percent of the temperature being measured expressed in degrees Celsius, whichever is greater. During coating operations, the owner or operator shall record all periods in excess of 3 hours where the average difference between the temperature upstream and downstream of the incinerator catalyst bed remains below 80 percent of the temperature difference at which compliance was demonstrated during the most recent measurement of incinerator efficiency or when the inlet temperature falls more than 28 °C (50 °F) below the temperature at which compliance with §60.462(a)(2), (3), or (4) was demonstrated during the most recent measurement of incinerator efficiency required by §60.8. The records required by §60.7 shall identify each such occurrence and its duration.

[47 FR 49612, Nov. 1, 1982; 48 FR 1056, Jan. 10, 1983, as amended at 65 FR 61761, Oct. 17, 2000]

§ 60.465 Reporting and recordkeeping requirements.

(a) Where compliance with the numerical limit specified in §60.462(a) (1), (2), or (4) is achieved through the use of low VOC-content coatings without emission control devices or through the use of higher VOC-content coatings in conjunction with emission control devices, each owner or operator subject to the provisions of this subpart shall include in the initial compliance report required by §60.8 the weighted average of the VOC content of coatings used during a period of one calendar month for each affected facility. Where compliance with §60.462(a)(4) is achieved through the intermittent use of a control device, reports shall include separate values of the weighted average VOC content of coatings used with and without the control device in operation.

(b) Where compliance with §60.462(a)(2), (3), or (4) is achieved through the use of an emission control device that destroys VOC's, each owner or operator subject to the provisions of this subpart shall include the following data in the initial compliance report required by §60.8:

(1) The overall VOC destruction rate used to attain compliance with §60.462(a)(2), (3), or (4) and the calculated emission limit used to attain compliance with §60.462(a)(4); and

(2) The combustion temperature of the thermal incinerator or the gas temperature, both upstream and downstream of the incinerator catalyst bed, used to attain compliance with §60.462(a)(2), (3), or (4).

(c) Following the initial performance test, the owner or operator of an affected facility shall identify, record, and submit a written report to the Administrator every calendar quarter of each instance in which the volume-weighted average of the local mass of VOC's emitted to the atmosphere per volume of applied coating solids (N) is greater than the limit specified under §60.462. If no such instances have occurred during a particular quarter, a report stating this shall be submitted to the Administrator semiannually.

(d) The owner or operator of each affected facility shall also submit reports at the frequency specified in §60.7(c) when the incinerator temperature drops as defined under §60.464(c). If no such periods occur, the owner or operator shall state this in the report.

(e) Each owner or operator subject to the provisions of this subpart shall maintain at the source, for a period of at least 2 years, records of all data and calculations used to determine monthly VOC emissions from each affected facility and to determine the monthly emission limit, where applicable. Where compliance is achieved through the use of thermal incineration, each owner or operator shall maintain, at the source, daily records of the incinerator combustion temperature. If catalytic incineration is used, the owner or operator shall maintain at the source daily records of the gas temperature, both upstream and downstream of the incinerator catalyst bed.

[47 FR 49612, Nov. 1, 1982, as amended at 55 FR 51383, Dec. 13, 1990; 56 FR 20497, May 3, 1991; 65 FR 61761, Oct. 17, 2000]

§ 60.466 Test methods and procedures.

(a) The reference methods in appendix A to this part, except as provided under §60.8(b), shall be used to determine compliance with §60.462 as follows:

(1) Method 24, or data provided by the formulator of the coating, shall be used for determining the VOC content of each coating as applied to the surface of the metal coil. In the event of a dispute, Method 24 shall be the reference method. When VOC content of waterborne coatings, determined by Method 24, is used to determine compliance of affected facilities, the results of the Method 24 analysis shall be adjusted as described in Section 12.6 of Method 24;

(2) Method 25, both for measuring the VOC concentration in each gas stream entering and leaving the control device on each stack equipped with an emission control device and for measuring the VOC concentration in each gas stream emitted directly to the atmosphere;

(3) Method 1 for sample and velocity traverses;

(4) Method 2 for velocity and volumetric flow rate;

(5) Method 3 for gas analysis; and

(6) Method 4 for stack gas moisture.

(b) For Method 24, the coating sample must be at least a 1-liter sample taken at a point where the sample will be representative of the coating as applied to the surface of the metal coil.

(c) For Method 25, the sampling time for each of three runs is to be at least 60 minutes, and the minimum sampling volume is to be at least 0.003 dscm (0.11 dscf); however, shorter sampling times or smaller volumes, when necessitated by process variables or other factors, may be approved by the Administrator.

(d) The Administrator will approve testing of representative stacks on a case-by-case basis if the owner or operator can demonstrate to the satisfaction of the Administrator that testing of representative stacks yields results comparable to those that would be obtained by testing all stacks.

[47 FR 49612, Nov. 1, 1982, as amended at 51 FR 22938, June 24, 1986; 65 FR 61761, Oct. 17, 2000]

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

PART 70 OPERATING PERMIT
CERTIFICATION

Source Name: Roll Coater, Inc.
Source Address: 1950 East Main Street, Greenfield, Indiana 46140
Mailing Address: 1950 East Main Street, Greenfield, Indiana 46140
Part 70 Permit No.: T059-17551-00002

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

Please check what document is being certified:

☐ Annual Compliance Certification Letter

☐ Test Result (specify)

☐ Report (specify)

☐ Notification (specify)

☐ Affidavit (specify)

☐ Other (specify)

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

Signature:
Printed Name:
Title/Position:
Phone:
Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

COMPLIANCE BRANCH
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
Phone: 317-233-0178
Fax: 317-233-6865

PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT

Source Name: Roll Coater, Inc.
Source Address: 1950 East Main Street, Greenfield, Indiana 46140
Mailing Address: 1950 East Main Street, Greenfield, Indiana 46140
Part 70 Permit No.: T059-17551-00002

This form consists of 2 pages **Page 1 of 2**

☐ This is an emergency as defined in 326 IAC 2-7-1(12)

- The Permittee must notify the Office of Air Quality (OAQ), within four (**4**) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
- The Permittee must submit notice in writing or by facsimile within two (**2**) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16.

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

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

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
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

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

PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Roll Coater, Inc.
Source Address: 1950 East Main Street, Greenfield, Indiana 46140
Mailing Address: 1950 East Main Street, Greenfield, Indiana 46140
Part 70 Permit No.: T059-17551-00002

Months: _____ to _____ Year: _____

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. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

☐ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

☐ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

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: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Quality

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

Source Background and Description

Source Name:	Roll Coater, Inc.
Source Location:	1950 E. Main Street, Greenfield, Indiana 46140
County:	Hancock
SIC Code:	3479
Operation Permit No.:	T059-7584-00002
Operation Permit Issuance Date:	December 28, 1998
Permit Renewal No.:	T059-17551-00002
Permit Reviewer:	ERG/TDP

On June 6, 2007, the Office of Air Quality (OAQ) had a notice published in The Daily Reporter, Greenfield, Indiana, stating that Roll Coater, Inc. had applied for a Part 70 Operating Permit Renewal to operate a stationary coil coating operation with control. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On July 3, 2007, Roll Coater, Inc. submitted comments on the proposed Part 70 Renewal. The summary of the comments is as follows:

Comment 1:

Upon further review of 40 CFR 60 Subpart FFF - Standards of Performance for Flexible Vinyl and Urethane Coating and Printing, Roll Coater has determined that this standard is no longer applicable to Line 2. Line 2 does not print or coat materials that contain or consist of vinyl or urethane sheets or a vinyl or urethane coated web with gravure cylinders. Roll Coater requests that all references to Subpart FFF as it relates to Line 2 be deleted from the permit and TSD. Furthermore, Roll Coater requests that the description of Line 2 as a "metal and vinyl coil coating line" be changed to "metal coil coating line" where necessary.

Response to Comment 1:

IDEM, OAQ agrees that 40 CFR 60, Subpart FFF, Standards of Performance for Flexible Vinyl and Urethane Coating and Printing do not apply to Line 2. The permit has been modified as shown below. No changes have been made to the TSD because the OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

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

. . .

(b) One (1) metal ~~and vinyl~~ coil coating line, identified as Line 2, with a maximum throughput of 300 gallons of solvent per hour, using one (1) thermal oxidizer as control, and consisting of the following equipment:

. . .

This metal ~~and vinyl~~ coil coating line, identified as Line 2, is an affected unit under 40 CFR 60, Subpart TT, ~~40 CFR 60, Subpart FFF,~~ and 40 CFR 63 Subpart SSSS.

. . .

SECTION D.2 FACILITY OPERATION CONDITIONS – Two (2) coil-coating lines (Line 2 and Line 3)

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

(b) One (1) metal ~~and vinyl~~ coil coating line, identified as Line 2, with a maximum throughput of 300 gallons of solvent per hour, using one (1) thermal oxidizer as control, and consisting of the following equipment:

. . .

This metal ~~and vinyl~~ coil coating line, identified as Line 2, is an affected unit under 40 CFR 60, Subpart TT, ~~40 CFR 60, Subpart FFF,~~ and 40 CFR 63 Subpart SSSS.

. . .

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

D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-4]

(a) Pursuant to 326 IAC 8-2-4 (Coil Coating Emission Limitations), the Permittee shall not allow or permit the discharge into the atmosphere of any volatile organic compound in excess of 2.6 pounds per gallon of coating, excluding water, delivered to the coating applicator, when surface coating metal ~~or vinyl~~ coils in Line 2 and Line 3.

. . .

D.2.4 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

Pursuant to CP 059-4512-00002, issued on October 4, 1995, the thermal incinerators for VOC control shall be in operation at all times when the metal ~~and vinyl~~ coil coating line (Line 2) and metal coil coating line (Line 3) are in operation.

. . .

SECTION E.2 FACILITY OPERATION CONDITIONS

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

(b) One (1) metal ~~and vinyl~~ coil coating line, identified as Line 2, with a maximum throughput of 300 gallons of solvent per hour, using one (1) thermal oxidizer as control, and consisting of the following equipment:

. . .

This metal ~~and vinyl~~ coil coating line, identified as Line 2, is an affected unit under 40 CFR 60, Subpart TT, ~~40 CFR 60, Subpart FFF,~~ and 40 CFR 63 Subpart SSSS.

. . .

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

. . .

~~SECTION E.3 FACILITY OPERATION CONDITIONS~~

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

~~(b) One (1) metal and vinyl coil coating line, identified as Line 2, with a maximum throughput of 300 gallons of solvent per hour, using one (1) thermal oxidizer as control, and consisting of the following equipment:~~

~~(1) One (1) wet section and brush, constructed in 1964, exhausting to stack 1;~~

~~(2) Cooling towers, constructed in October 1993, exhausting to stack 2;~~

~~(3) Cooling towers, constructed in October 1993, exhausting to stack 3;~~

~~(4) One (1) thermal oxidizer stack (via heat exchanger), constructed in September 1995, identified as stack 4A;~~

~~(5) One (1) thermal oxidizer stack, constructed in September 1995, identified as stack 4B;~~

~~(6) One (1) prime coater room, constructed in 1964, utilizing rollcoating, exhausting to stack 5;~~

~~(7) One (1) finish coater room, constructed in 1964, utilizing rollcoating, exhausting to stack 6;~~

~~(8) One (1) finish quench, constructed in 1964, exhausting to stack 7;~~

~~(9) One (1) air knife exhaust, constructed in 1964, identified as stack 20.~~

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

~~E.3.1 General Provisions Relating to New Source Performance Standards [326 IAC 12-1] [40 CFR Part 60, Subpart A]~~

~~(a) Pursuant to 40 CFR 60.1, the Permittee shall comply with the provisions of 40 CFR Part 60 Subpart A – General Provisions, which are incorporated by reference as 326 IAC 12-1 for the prime coater and finish coater (Line 2) in 40 CFR Part 60, Subpart FFF.~~

~~(b) Pursuant to 40 CFR 60.19, the Permittee shall submit all required notifications and reports to:~~

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

~~E.3.2 Standard of Performance for Flexible Vinyl and Urethane Coating Requirements [40 CFR Part 60, Subpart FFF]~~

~~Pursuant to 40 CFR Part 60, Subpart FFF, the Permittee shall comply with the provisions of Standard of Performance for Flexible Vinyl and Urethane Coating, which are incorporated by reference as 326 IAC 12, for the prime coater and finish coater (Line 2) as follows:~~

~~Subpart FFF-Standards of Performance for Flexible Vinyl and Urethane Coating and Printing~~

~~Source:~~ ~~49 FR 26892, June 29, 1984, unless otherwise noted.~~

~~§ 60.580 Applicability and designation of affected facility.~~

~~(a) The affected facility to which the provisions of this subpart apply is each rotogravure printing line used to print or coat flexible vinyl or urethane products.~~

~~(b) This subpart applies to any affected facility which begins construction, modification, or reconstruction after January 18, 1983.~~

~~§ 60.581 Definitions and symbols.~~

~~(a) All terms used in this subpart, not defined below, are given the same meaning as in the Act or in subpart A of this part.~~

~~*Emission control device* means any solvent recovery or solvent destruction device used to control volatile organic compounds (VOC) emissions from flexible vinyl and urethane rotogravure printing lines.~~

~~*Emission control system* means the combination of an emission control device and a vapor capture system for the purpose of reducing VOC emissions from flexible vinyl and urethane rotogravure printing lines.~~

~~*Flexible vinyl and urethane products* mean those products, except for resilient floor coverings (1977 Standard Industry Code 3996) and flexible packaging, that are more than 50 micrometers (0.002 inches) thick, and that consist of or contain a vinyl or urethane sheet or a vinyl or urethane coated web.~~

~~*Gravure cylinder* means a plated cylinder with a printing image consisting of minute cells or indentations, specifically engraved or etched into the cylinder's surface to hold ink when continuously revolved through a fountain of ink.~~

~~*Ink* means any mixture of ink, coating solids, organic solvents including dilution solvent, and water that is applied to the web of flexible vinyl or urethane on a rotogravure printing line.~~

~~*Ink solids* means the solids content of an ink as determined by Method 24, ink manufacturer's formulation data, or plant blending records.~~

~~*Inventory system* means a method of physically accounting for the quantity of ink, solvent, and solids used at one or more affected facilities during a time period. The system is based on plant purchase or inventory records.~~

~~*Plant blending records* means those records which document the weight fraction of organic solvents and solids used in the formulation or preparation of inks at the vinyl or urethane printing plant where they are used.~~

~~*Rotogravure print station* means any device designed to print or coat inks on one side of a continuous web or substrate using the intaglio printing process with a gravure cylinder.~~

~~*Rotogravure printing line* means any number of rotogravure print stations and associated dryers capable of printing or coating simultaneously on the same continuous vinyl or urethane web or substrate, which is fed from a continuous roll.~~

~~*Vapor capture system* means any device or combination of devices designed to contain, collect, and route organic solvent vapors emitted from the flexible vinyl or urethane rotogravure printing line.~~

~~(b) All symbols used in this subpart not defined below are given the same meaning as in the Act or in subpart A of this part.~~

~~a=the gas stream vents exiting the emission control device.~~

~~bthe gas stream vents entering the emission control device.~~

~~fthe gas stream vents which are not directed to an emission control device.~~

~~C_{aj}=the concentration of VOC in each gas stream (j) for the time period exiting the emission control device, in parts per million by volume.~~

~~C_{bi}=the concentration of VOC in each gas stream (i) for the time period entering the emission control device, in parts per million by volume.~~

~~C_{fk}=the concentration of VOC in each gas stream (k) for the time period which is not directed to an emission control device, in parts per million by volume.~~

~~Gthe weighted average mass of VOC per mass of ink solids applied, in kilograms per kilogram.~~

~~M_{ei}=the total mass of each ink (i) applied in the time period as determined from plant records, in kilograms.~~

~~M_{dj}=the total mass of each dilution solvent (j) added at the print line in the time period determined from plant records, in kilograms.~~

~~Q_{aj}=the volumetric flow rate of each effluent gas stream (j) exiting the emission control device, in standard cubic meters per hour.~~

~~Q_{bi}=the volumetric flow rate of each effluent gas stream (i) entering the emission control device, in standard cubic meters per hour.~~

~~Q_{fk}=the volumetric flow rate of each effluent gas stream (k) not directed to an emission control device, in standard cubic meters per hour.~~

~~Ethe VOC emission reduction efficiency (as a fraction) of the emission control device during performance testing.~~

~~Fthe VOC emission capture efficiency (as a fraction) of the vapor capture system during performance testing.~~

~~W_{oi}=the weight fraction of VOC in each ink (i) used in the time period as determined from Method 24, manufacturer's formulation data, or plant blending records, in kilograms per kilogram.~~

~~W_{si}"means the weight fraction of solids in each ink (i) used in the time period as determined from Method 24, manufacturer's formulation data, or plant blending records, in kilograms per kilogram.~~

~~W_{oj}=the weight fraction of VOC in each dilution solvent (j) added at the print line in the time period determined from Method 24, manufacturer's formulation data, or plant blending records, in kilograms per kilogram.~~

~~[49 FR 26892, June 29, 1984; 49 FR 32848, Aug. 17, 1984, as amended at 65 FR 61768, Oct. 17, 2000]~~

~~§ 60.582 Standard for volatile organic compounds.~~

~~(a) On and after the date on which the performance test required by §60.8 has been completed, each owner or operator subject to this subpart shall either:~~

~~(2) Reduce VOC emissions to the atmosphere by 85 percent from each affected facility.~~

~~(b) [Reserved]~~

~~§ 60.583 Test methods and procedures.~~

~~(a) Methods in appendix A of this part, except as provided under §60.8(b), shall be used to determine compliance with §60.582(a) as follows:~~

~~(1) Method 24 for analysis of inks. If nonphotochemically reactive solvents are used in the inks, standard gas chromatographic techniques may be used to identify and quantify these solvents. The results of Method 24 may be adjusted to subtract these solvents from the measured VOC content.~~

~~(2) Method 25A for VOC concentration (the calibration gas shall be propane);~~

~~(3) Method 1 for sample and velocity traverses;~~

~~(4) Method 2 for velocity and volumetric flow rates;~~

~~(5) Method 3 for gas analysis;~~

~~(6) Method 4 for stack gas moisture.~~

~~(d) To demonstrate compliance with §60.582(a)(2), the owner or operator of an affected facility controlled by a solvent recovery emission control device or an incineration control device shall conduct a performance test to determine overall VOC emission control efficiency according to the following procedures:~~

~~(1) The performance test shall consist of three runs. Each test run must last a minimum of 30 minutes and shall continue until the printing operation is interrupted or until 180 minutes of continuous operation occurs. During each test run, the print line shall be printing continuously and operating normally. The VOC emission reduction efficiency achieved for each test run is averaged over the entire test run period.~~

~~(2) VOC concentration values at each site shall be measured simultaneously.~~

~~(3) The volumetric flow rate shall be determined from one Method 2 measurement for each test run conducted immediately prior to, during, or after that test run. Volumetric flow rates at each site do not need to be measured simultaneously.~~

~~(5) For each affected facility, compliance with §60.582(a)(2) has been demonstrated if the average value of the overall control efficiency (EF) for the three runs is equal to or greater than 85 percent. An overall control efficiency is calculated for each run as follows:~~

~~(i) For efficiency of the emission control device,~~

$$E = \frac{\sum_{i=1}^{n}(Q_{bi}C_{bi}) - \sum_{j=1}^{m}(Q_{aj}C_{aj})}{\sum_{i=1}^{n}(Q_{bi}C_{bi})}$$

~~[49 FR 26892, June 29, 1984; 49 FR 32848, Aug. 17, 1984, as amended at 65 FR 61768, Oct. 17, 2000]~~

~~§ 60.584 Monitoring of operations and recordkeeping requirements.~~

~~(b) The owner or operator of an affected facility controlled by a thermal incineration emission control device shall install, calibrate, operate, and maintain a monitoring device that continuously measures and records the temperature of the control device exhaust gases and shall comply with the following requirements:~~

~~(1) The continuous monitoring device shall be calibrated annually and have an accuracy of ±0.75 percent of the temperature being measured, expressed in degrees Celsius, or ±2.5 °C, whichever is greater.~~

~~(2) During the performance test, the owner or operator shall determine and record the average temperature of the control device exhaust gases. After the performance test, the owner or operator shall determine and record, in addition to the record made by the continuous monitoring device, the average temperature for each 3-hour clock period of printing operation when the average temperature of the exhaust gases is more than 28 °C (50 °F) below the average temperature demonstrated during the most recent performance test.~~

~~(d) The owner or operator of an affected facility shall record time periods of operation when an emission control device is not in use.~~

~~[49 FR 26892, June 29, 1984, as amended at 65 FR 61768, Oct. 17, 2000]~~

~~§ 60.585 Reporting requirements.~~

~~(a) For all affected facilities subject to compliance with §60.582, the performance test data and results from the performance test shall be submitted to the Administrator as specified in §60.8(a).~~

~~(b) The owner or operator of each affected facility shall submit semiannual reports to the Administrator of occurrences of the following:~~

~~(3) Drops in the incinerator temperature as defined under §60.584(b)(2); and~~

~~(c) The reports required under paragraph (b) shall be postmarked within 30 days following the end of the second and fourth calendar quarters.~~

~~(d) The requirements of this subsection remain in force until and unless the Agency, in delegating enforcement authority to a State under section 111(c) of the Act, approves reporting requirements or an alternative means of compliance surveillance adopted by such States. In that event, affected sources within the State will be relieved of the obligation to comply with this subsection, provided that they comply with requirements established by the State.~~

SECTION ~~E.4~~ **E.3** FACILITY OPERATION CONDITIONS

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

(b) One (1) metal ~~and vinyl~~ coil coating line, identified as Line 2, with a maximum throughput of 300 gallons of solvent per hour, using one (1) thermal oxidizer as control, and consisting of the following equipment:

. . .

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

~~E.4.1~~ **E.3.1** General Provisions Relating to New Source Performance Standards [326 IAC 12-1] [40 CFR Part 60, Subpart A]

. . .

~~E.4.2~~ **E.3.2** Standard of Performance for Metal Coil Surface Coating Requirements [40 CFR Part 60, Subpart TT]

. . .

Comment 2:

In the description of Line 3, the following pieces of equipment should be correctly described throughout the permit as follows:

(4) One (1) thermal oxidizer (prime), constructed in 1968, exhausting to stack 14A;

(5) One (1) thermal oxidizer exhaust (prime via waste heat fired boiler), identified as stack 14b;

Response to Comment 2:

IDEM, OAQ agrees. The permit has been modified as follows:

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

. . .

(c) One (1) metal coil coating line, constructed in 1968, identified as Line 3, with a maximum throughput of 280 gallons of solvent per hour, using one (1) thermal oxidizer as control, and consisting of the following equipment:

(4) One (1) thermal oxidizer ~~exhaust (prime via waste heat fired boiler)~~ **(prime)**, constructed in 1968, exhausting to stack 14A;

(5) One (1) ~~boiler and~~ thermal oxidizer ~~(prime)~~ **exhaust (prime via waste heat fired boiler)**, identified as stack 14b;

SECTION D.2 FACILITY OPERATION CONDITIONS – Two (2) coil-coating lines (Line 2 and Line 3)

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

. . .

(c) One (1) metal coil coating line, constructed in 1968, identified as Line 3, with a maximum throughput of 280 gallons of solvent per hour, using one (1) thermal oxidizer as control, and consisting of the following equipment:

. . .

(4) One (1) thermal oxidizer ~~exhaust (prime via waste heat fired boiler)~~ **(prime)**, constructed in 1968, exhausting to stack 14A;

(5) One (1) ~~boiler and~~ thermal oxidizer ~~(prime)~~ **exhaust (prime via waste heat fired boiler)**, identified as stack 14b;

. . .

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

SECTION E.2 FACILITY OPERATION CONDITIONS

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

. . .

(c) One (1) metal coil coating line, constructed in 1968, identified as Line 3, with a maximum throughput of 280 gallons of solvent per hour, using one (1) thermal oxidizer as control, and consisting of the following equipment:

. . .

(4) One (1) thermal oxidizer ~~exhaust (prime via waste heat fired boiler)~~ **(prime)**, constructed in 1968, exhausting to stack 14A;

(5) One (1) ~~boiler and~~ thermal oxidizer ~~(prime)~~ **exhaust (prime via waste heat fired boiler)**, identified as stack 14b;

. . .

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

Comment 3:

Regarding permit condition C.17 General Reporting Requirements, Roll Coater's current permit requires semi-annual reporting. This fulfills the requirement of 326 IAC 2-7-5(3)(C)(i). Roll Coater has demonstrated a good compliance history and timely reporting under the semi-annual frequency. Roll Coater requests that the minimum frequency for submittal of the Deviation and Compliance Monitoring report be maintained as semi-annual, rather than quarterly.

Response to Comment 3:

IDEM, OAQ is no longer requiring sources to report deviations in ten days; therefore, every source will need to submit a Quarterly Deviation and Compliance Monitoring Report. The condition has been revised to be consistent with the rest of the permit. This does not stray from the intent of the rule, because the rule requires "...at least every six (6) months", and in this case OAQ has determined that more frequent reporting is appropriate. Therefore, no changes have been made to the permit.

Comment 4:

Condition C.15(a) and page 11 of the TSD indicates that the Permittee is only required to submit an emission statement on a triennial schedule. However, the potential to emit from the table on page 6 of the TSD indicates that sourcewide PTE is 288 tons per year of VOC. 326 IAC 2-6-3(a)(1)(B) suggests that Roll Coater must submit an emission statement annually due to its potential to emit greater than 250 tons per year of VOC.

Response to Comment 4:

IDEM, OAQ agrees. IDEM, OAQ has determined that sourcewide potential to emit of VOC is 2,781 tons per year (See Comment 12). In accordance with the compliance schedule specified in 326 IAC 2-6-3, an emission statement must be submitted annually by July 1 beginning in 2008 and every year after. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4. The permit has been modified as follows:

C.15 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

(a) Pursuant to 326 IAC 2-6-3(b)~~(2)~~**(1)**, ~~starting in 2005 and every three (3) years thereafter,~~ the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

. . .

No changes have been made to the TSD because the OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

Comment 5:

Roll Coater requests that Condition D.1.2 be removed from the permit. 326 IAC 1-6-3 indicates that preventive maintenance plans must contain information regarding inspection, maintenance, and repair of emission control devices. The Cleaver Brooks firetube natural gas-fueled boiler to which Condition D.1.2 applies does not have an associated emission control device to inspect, maintain, and repair. Therefore, this requirement appears to be non-applicable.

Response to Comment 5:

The Preventive Maintenance Plan requirement must be included in every applicable Title V permit pursuant to 326 IAC 2-7-5(13). This rule refers back to the Preventive Maintenance Plan requirement as described in 326 IAC 1-6-3. This Preventive Maintenance Plan rule sets out the requirements for:

(1) Identification of the individuals responsible for inspecting, maintaining and repairing the emission control equipment (326 IAC 1-6-3(a)(1)),

(2) The description of the items or conditions in the facility that will be inspected and the inspection schedule for said items or conditions (326 IAC 1-6-3(a)(2)), and

(3) The identification and quantification of the replacement parts for the facility which the Permittee will maintain in inventory for quick replacement (326 IAC 1-6-3(a)(2)).

It is clear from the structure of the wording in 326 IAC 1-6-3 that the PMP requirement affects the entirety of the applicable facilities. Only 326 IAC 1-6-3(a)(1) is limited, in that it requires identification of the personnel in charge of only the emission control equipment, and not any other facility equipment. 326 IAC 1-6-3(b) provides that "…as deemed necessary by the commissioner, any person operating a facility shall comply with the requirements of subsection (a) of this section."

Many types of facilities require maintenance in order to prevent excess emissions. Preventive maintenance should be performed on the Cleaver Brooks firetube natural gas-fueled boiler itself because lack of proper maintenance on the boiler can result in leaks or improper settings which can result in increased emissions.

Therefore, Condition D.1.2 will remain unchanged.

Comment 6:

Regarding Condition D.2.4, Roll Coater requests the phrase "in operation" at the end of the first paragraph be replaced with "conducting coating operations (i.e., when coating is being applied and the coating contains VOC)". There are some products and operations run on the production lines that do not include application of coatings or coatings containing VOCs. During these times and when the production lines are not conducting coating operations, operation of the thermal oxidizers would serve no emission control purposes. Furthermore, for consistency throughout the permit, Roll Coater requests that the word "incinerators" in the first paragraph of the condition be replaced with the words "thermal oxidizers".

Response to Comment 6:

IDEM, OAQ agrees. The permit has been modified as follows:

D.2.4 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

Pursuant to CP 059-4512-00002, issued on October 4, 1995, the thermal ~~incinerators~~ **oxidizers** for VOC control shall be in operation at all times when ~~the metal and vinyl coil coating line (Line 2) and metal coil coating line (Line 3) are in operation~~ **coating is being applied in coil coating line (Line 2) and metal coil coating line (Line 3) and the coating applied contains VOC.**
. . .

Comment 7:

Regarding Condition D.2.5, Roll Coater requests that the word "incinerator" be changed to "oxidizer" in the title of this condition, to maintain consistency throughout the permit.

Condition D.2.5(a) contains the statement "For the purpose of this condition, continuous means no less than once per minute." Roll Coater requests the basis for this requirement. Under 40 CFR 64.3(b)(4)(ii) (CAM), the minimum requirement is collection of four (4) or more data values equally spaced over each hour. This is further reflected in the applicable NESHAP for the coating lines at 40 CFR 63.5160(d)(3)(i)(A). On the basis of these requirements, Roll Coater requests that the statement be revised to state "...continuous means no less than once every 15 minutes".

In the applicable NESHAP, 40 CFR 63.5170(f)(1)(ii) clarifies that the requirement to continuously monitor the thermal oxidizer operating temperature applies when the associated work station is in operation (i.e., during actual coating operations). Roll Coater's existing permit requires that "the thermal oxidation unit and the unit's measuring and recording devices shall be operated properly at all times during actual coating operations (i.e., when coating contains VOC)." Roll Coater requests inclusion of a statement that continuous monitoring of the thermal oxidizer operating temperature is required during actual coating operations (i.e., when coating is being applied and the coating contains VOC).

Roll Coater requests exclusion of the phrase, "From the date of issuance of this permit until the approved stack test results are available" from the fourth sentence of the paragraph. Condition D.2.3 acknowledges that Roll Coater completed the referenced stack testing on November 18, 2005 for Line 2 and Line 3.

Response to Comment 7:

IDEM, OAQ has changed the word "incinerator" to "oxidizer" in Condition D.2.5 to maintain consistency throughout the permit.

40 CFR 64.3(b)(4)(ii) requires that the Permittee "shall collect four or more data values equally spaced over each hour". The Permittee shall average the values, as applicable, over the applicable averaging period as determined in accordance with 40 CFR 64.3(b)(4)(i) which states that the period shall be "averaged consistent with the characteristics and typical variability of the pollutant-specific emissions unit (including the control device and associated capture system). Such intervals shall be commensurate with the time period over which a change in control device performance that would require actions by owner or operator to return operations within normal ranges or designated conditions is likely to be observed." IDEM, OAQ agrees that once every 15 minutes is sufficient to demonstrate compliance. Therefore, the permit has been updated.

IDEM, OAQ has included a statement to clarify that continuous monitoring of the thermal oxidizer operating temperature is required during actual coating operations (i.e., when coating is being applied and the coating contains VOC). Additionally, since stack testing has been completed for this source, IDEM, OAQ has removed the phrase "From the date of issuance of this permit until the approved stack test results are available".

The permit has been modified according to these comments as follows:

D.2.5 Thermal ~~Incinerator~~ **Oxidizer** [40 CFR 64]

(a) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring operating temperature **when coating is being applied and the coating contains VOC**. For the purpose of this condition, continuous means no less than once per **fifteen (15)** minute **period**. The output of this system shall be recorded as a 3-hour average. ~~From the date of issuance of this permit until the approved stack test results are available, the~~ **The** Permittee shall take appropriate response steps in accordance with Section C – Excursions and Exceedances whenever the 3-hour average temperature of the thermal oxidizer is below temperature established from the most recent valid stack test. A 3-hour average temperature that is below the temperature established from the most recent valid stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C – Excursions and Exceedances shall be considered a deviation from this permit.

. . .

Comment 8:

Regarding Condition D.2.6, the NESHAP to which Lines 2 and 3 are subject (40 CFR 63, Subpart SSSS) has requirements for capture system monitoring at 40 CR 63.5150(a)(4) and 40 CFR 63.5170(f), including a requirement to identify an operating parameter to be continuously monitored and a requirement to determine the 3-hour average value of this monitored parameter for comparison against an operating limit representing conditions indicative of proper operation and maintenance of the capture system. Roll Coater's current permit requires that the coater enclosure rooms and capture systems be operated during actual coating operations (i.e., when coating contains VOC) such that an average facial velocity of at least 200 feet per minute is maintained across all natural draft openings. Per Section 8.3 of Method 204 - *Criteria for and Verification of a Permanent or Temporary Total Enclosure*, a pressure differential across the enclosure of 0.007 inches H_2O (vacuum) corresponds to a facial velocity of 200 feet per minute. In compliance with Subpart SSSS, Roll Coater selected the pressure differential across the enclosure as the operating parameter to be continuously monitored and averaged for comparison against an operating limit of 0.007 inches H_2O vacuum. This parameter was monitored during the Subpart SSSS performance testing of Lines 2 and 3 completed on November 18, 2005 to ensure that proper conditions were maintained during the performance testing. Furthermore, monitoring and recording equipment for this operating parameter have been in place and operational on Lines 2 and 3 in compliance with Subpart SSSS since the compliance date, June 10, 2005. For these reasons, Roll Coater requests that pressure differential across the enclosure be substituted for fan amperage in Condition D.2.6 and compliance be determined relative to the 0.007 inches H_2O vacuum (200 fpm facial velocity) utilizing the 3-hour average operating value in compliance with Subpart SSSS.

Roll Coater requests that the requirement for daily records of fan amperage (Condition D.2.7(a)) be replaced with a requirement for records of differential pressure across the enclosure.

Response to Comment 8:

IDEM, OAQ agrees that the Permittee may monitor the duct pressure to comply with Subpart SSSS and 326 IAC 8-2-4. Therefore, Condition D.2.6 and D.2.7 have been modified as follows:

D.2.6 Parametric Monitoring **[40 CFR 64]**

(a) The Permittee shall determine ~~fan amperage~~ **duct pressure** from the most recent valid stack test that demonstrates compliance with limits in condition D.2.1, as approved by IDEM.

(b) The ~~fan amperage~~ **duct pressure** shall be observed at least once per day when the thermal oxidizer is in operation. When for any one reading, the ~~fan amperage~~ **duct pressure** is outside the normal range as established in most recent compliant stack test, the Permittee shall take reasonable response steps in accordance with Section C – Excursions and Exceedances. A reading that is outside the range as established in the most recent compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C – Excursions and Exceedances shall be considered a deviation from this permit.

D.2.7 Record Keeping Requirements

(a) To document compliance with Condition D.2.1, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC content limits and/or the VOC emission limits established in Condition D.2.1. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

. . .

(4) Daily records of the ~~fan amperage~~ **duct pressure**.

Comment 9:

Page 48 of the permit, regarding delegation of authority for Subpart SSSS, the line immediately prior to Table 1 states "§§63.5180 and 63.5190 [Reserved]". Roll Coater requests that this be corrected to "§§63.5201-63.5209 [Reserved]".

Response to Comment 9:

IDEM, OAQ has updated the permit to reflect the appropriate citation as follows:

SECTION E.2 FACILITY OPERATION CONDITIONS

. . .

Subpart SSSS-National Emission Standards for Hazardous Air Pollutants: Surface Coating of Metal Coil

. . .

§§~~63.5180~~ **63.5201** and ~~63.5190~~ **63.5209** [Reserved]

. . .

Comment 10:

Regarding page 7, Federal Rule Applicability, and page 13, Compliance Requirements, of the Technical Support Document, please see Roll Coater's comments regarding Conditions D.2.5 and D.2.6 of the draft permit in regards to proposed CAM. According to 40 CFR 64.4(b), to justify the appropriateness of the monitoring elements proposed, the owner or operator may rely in part on existing applicable requirements that establish the monitoring for the applicable pollutant-specific emissions unit or a similar unit. 40 CFR 64.4(b) goes on to state that if an owner or operator relies on presumptively acceptable monitoring, no

further justification for the appropriateness of that monitoring should be necessary other than an explanation of the applicability of such monitoring to the unit in question, unless data or other information is brought forward to rebut the assumption. 40 CFR 64.4(b) states that presumptively acceptable monitoring includes monitoring included for standards exempt from this part pursuant to 40 CFR 64.2(b)(1)(i) or (iv) to the extent such monitoring is applicable to the performance of the control device (and associated capture system) for the pollutant-specific emissions unit. Lines 2 and 3 are subject to 40 CFR 63 Subpart SSSS, which is a standard exempt from CAM pursuant to 40 CFR 64.2(b)(1)(i) because it is a standard proposed by the Administrator after November 15, 1990 pursuant to section 112 of the Clean Air Act. Therefore the monitoring required by Subpart SSSS (and discussed in Conditions D.2.5 and D.2.6 above) qualifies as presumptively acceptable monitoring under 40 CR 64.4(b)(4).

Response to Comment 11:

IDEM, OAQ agrees that the compliance monitoring pursuant to Condition D.2.5 and D.2.6 is sufficient to meet the requirements of 40 CFR 64 (CAM). However, no changes have been made to the TSD because the OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

Comment 12:

Regarding page 6 of TSD Appendix A, it appears, upon review of the Emissions Statement covering calendar year 2000 submitted by Roll Coater, that the number on this page indicated as "Total VOC used in 2000 on this line" (243 tons/year) is actually the VOC emissions to the atmosphere for calendar year 2000 from the Emissions Statement. Rather than 243 tons per year, the actual uncontrolled VOC input for calendar year 2000 was 2377 tons per year.

Response to Comment 12:
Based on the corrected annual VOC inputs, the uncontrolled potential to emit VOC from the coil coating lines is estimated at 2781 tons per year. Emissions after controls are calculated as follows:

Operation	Emissions (tpy)
Coater Rooms	222.5
Quench Stacks	2.781
Ovens/Afterburner	51.11
Total	276.4

Because the potential to emit of the source remains above 250 tons per year VOC, there is no change in source status or applicability of state and federal regulations. However, no changes have been made to the TSD because the OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

Upon further review, IDEM, OAQ has decided to make the following changes.

1. Section A.1 has been changed to correct the PSD source status.

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

The Permittee owns and operates a stationary coil coating operation.

. . .

Source Status: Part 70 Permit Program
~~Major~~ **Minor** Source, under PSD Rules;
. . .

2. 40 CFR 60, Subpart Dc was revised June 13, 2007. However, pursuant to 326 IAC 1-1-3, the version of the rule referenced by 326 IAC 12 was the version in existance on February 27, 2006, which was recently amended on June 13, 2007. Because the June 13, 2007 amendments to the federal rule are not approved in 326 IAC 12, the Cleaver Brooks boiler is subject to both versions of the rule.

   Pursuant to the February 26, 2006 version of the rule, this facility shall record and maintain records of the fuels combusted during each calendar month, because this facility burns a very low sulfur gaseous fuel and has potential sulfur dioxide emissions are less than 0.32 lb/MMBtu (40 CFR 60.48c(g)). The June 13, 2007 version of this Subpart indicates that this facility shall record and maintain records of the amount of fuel combusted during each operating day. However, 40 CFR 60.48c(g)(2) (June 13, 2007 version) provides an alternative for facilities that combust only natural gas and are not subject to an emissions standard (excluding opacity) may elect to record and maintain records monthy. This facility combusts only natural gas and is not subject to emissions standards under this Subpart. This facility will maintain monthly fuel records to demonstrate compliance with 40 CFR 60 and 326 IAC 12. Therefore, Condition D.1.3 has been removed from the permit, and Section E.1 has been updated as follows:

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

~~D.1.3 Record Keeping Requirements [326 IAC 12]~~

~~(a) Pursuant to 326 IAC 12, the Permittee shall maintain daily records of the amount and type of fuel combusted by the boiler. This condition expires when the revisions made to 40 CFR 60, Subpart Dc as amended on February 27, 2006, are incorporated into the Indiana Administrative Code. This condition is not federally enforceable.~~

~~(b) All records shall be maintained in accordance with Section C – General Record Keeping Requirements, of this permit.~~

SECTION E.1 FACILITY OPERATION CONDITIONS

. . .

Subpart GG – New Source Performance Standards for Small Industrial, Commercial, Institutional Steam Generating Units

. . .

§ 60.48c Reporting and recordkeeping requirements.

~~(g) The owner or operator of each affected facility shall record and maintain records of the amounts of each fuel combusted during each day. The owner or operator of an affected facility that only burns very low sulfur fuel oil or other liquid or gaseous fuels with potential sulfur dioxide emissions rate of 140 ng/J (0.32 lb/MMBtu) heat input or less shall record and maintain records of the fuels combusted during each calendar month.~~

(g)(1) Except as provided under paragraphs (g)(2) and (g)(3) of this section, the owner or operator of each affected facility shall record and maintain records of the amount of each fuel combusted during each operating day.

(2) As an alternative to meeting the requirements of paragraph (g)(1) of this section, the owner or operator of an affected facility that combusts only natural gas, wood, fuels using fuel certification in §60.48c(f) to demonstrate compliance with the SO_2 standard, fuels not subject to an emissions standard (excluding opacity), or a mixture of these fuels may elect to record and maintain records of the amount of each fuel combusted during each calendar month.

(3) As an alternative to meeting the requirements of paragraph (g)(1) of this section, the owner or operator of an affected facility or multiple affected facilities located on a contiguous property unit where the only fuels combusted in any steam generating unit (including steam generating units not subject to this subpart) at that property are natural gas, wood, distillate oil meeting the most

current requirements in §60.42C to use fuel certification to demonstrate compliance with the SO_2 standard, and/or fuels, excluding coal and residual oil, not subject to an emissions standard (excluding opacity) may elect to record and maintain records of the total amount of each steam generating unit fuel delivered to that property during each calendar month.

. . .

[55 FR 37683, Sept. 12, 1990, as amended at 64 FR 7465, Feb. 12, 1999; 65 FR 61753, Oct. 17, 2000; 71 FR 9886, Feb. 27, 2006 **72 FR 32759, June 13, 2007**]

Indiana Department of Environmental Management
Office of Air Quality

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

Source Background and Description

Source Name:	Roll Coater, Inc.
Source Location:	1950 E. Main Street, Greenfield, Indiana 46140
County:	Hancock
SIC Code:	3479
Operation Permit No.:	T059-7584-00002
Operation Permit Issuance Date:	December 28, 1998
Permit Renewal No.:	T059-17551-00002
Permit Reviewer:	ERG/TDP

The Office of Air Quality (OAQ) has reviewed a Part 70 Operating Permit Renewal application from Roll Coater, Inc. relating to the operation of a stationary coil coating operation.

Permitted Emission Units and Pollution Control Equipment

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

(a) One (1) Cleaver Brooks firetube natural gas-fueled boiler, constructed in December 1996, identified as Boiler, with a maximum heat input capacity of 12.56 million British thermal units per hour, exhausting to stack 22. This unit is an affected unit under 40 CFR 60, Subpart Dc and 40 CFR 63, Subpart DDDDD.

(b) One (1) metal and vinyl coil coating line, identified as Line 2, with a maximum throughput of 300 gallons of solvent per hour, using one (1) thermal oxidizer as control, and consisting of the following equipment:

(1) One (1) wet section and brush, constructed in 1964, exhausting to stack 1;

(2) Cooling towers, constructed in October 1993, exhausting to stack 2;

(3) Cooling towers, constructed in October 1993, exhausting to stack 3;

(4) One (1) thermal oxidizer stack (via heat exchanger), constructed in September 1995, identified as stack 4A;

(5) One (1) thermal oxidizer stack, constructed in September 1995, identified as stack 4B;

(6) One (1) prime coater room, constructed in 1964, utilizing rollcoating, exhausting to stack 5;

(7) One (1) finish coater room, constructed in 1964, utilizing rollcoating, exhausting to stack 6;

(8) One (1) finish quench, constructed in 1964, exhausting to stack 7;

(9) One (1) air knife exhaust, constructed in 1964, identified as stack 20.

This metal and vinyl coil coating line, identified as Line 2, is an affected unit under 40 CFR 60, Subpart TT, 40 CFR 60, Subpart FFF, and 40 CFR 63 Subpart SSSS.

(c) One (1) metal coil coating line, constructed in 1968, identified as Line 3, with a maximum throughput of 280 gallons of solvent per hour, using one (1) thermal oxidizer as control, and consisting of the following equipment:

(1) One (1) preclean wet section, exhausting to stack 11;

(2) One (1) wet section exhaust, identified as stack 12;

(3) One (1) prime and finish coater, utilizing rollcoating, exhausting to stack 13;

(4) One (1) thermal oxidizer exhaust (prime), constructed in 1968, exhausting to stack 14A;

(5) One (1) boiler and thermal oxidizer (prime via waste heat fired boiler), identified as stack 14b;

(6) One (1) thermal oxidizer (finish), constructed in 1968, exhausting to stack 15A;

(7) One (1) thermal oxidizer exhaust (finish via waste heat fired boiler), identified as stack 15B;

(8) One (1) prime quench, exhausting to stack 16;

(9) One (1) finish quench, exhausting to stack 17;

(10) Cooling towers, exhausting to stack 18;

(11) Cooling towers, exhausting to stack 19;

(12) One (1) air knife exhaust, identified as stack 21;

(13) One (1) Line 3 natural gas-fueled air make-up unit, constructed in June 1992, identified as Air Make-up, with a maximum heat input capacity of 12.96 million British thermal units per hour.

The metal coil coating line, identified as Line 3, is an affected unit under 40 CFR 63, Subpart SSSS.

Unpermitted Emission Units and Pollution Control Equipment

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

Insignificant Activities

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

(a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million BTU per hour.

(b) Combustion source flame safety purging on startup.

(c) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.

(d) The following VOC and HAP storage containers: Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.

(e) Equipment used exclusively for the following: Filling drums, pail or other packaging containers with lubricating oils, waxes, and greases.

(f) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.

(g) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.

(h) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.

(i) Closed loop heating and cooling systems.

(j) Infared cure equipment.

(k) Any of the following structural steel and bridge fabrication activities:

(1) Cutting 200,000 linear feet or less of one inch (1”) plate or equivalent;

(2) Using 80 tons or less of welding consumables;

(l) Rolling oil recovery systems.

(m) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume.

(n) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs.

(o) Quenching operations used with heat treating processes.

(p) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

(q) Heat exchanger cleaning and repair.

(r) Paved and unpaved roads with public access. [326 IAC 6-4]

(s) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.

(t) Blowdown for any of the following: sight glass; boiler; compressors; pumps and cooling tower.

(u) On-site fire and emergency response training approved by the department.

(v) Stationary fire pumps.

(w) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minutes, including the following: deburring, buffing; polishing; abrasive blasting; and woodworking operations. [326 IAC 6-3-2]

(x) Purge double block and bleed valves.

(y) Filter or coalesce media changeout.

(z) A laboratory as defined in 326 IAC 2-7-1(21)(D).

Existing Approvals

The source has been operating under Part 70 Operating Permit T059-7584-00002, issued on December 28, 1998, and the following approvals:

(a) First Administrative Amendment 059-10687-00002, issued April 26, 1999; and

(b) First Reopening 059-13305-00002, issued March 19, 2002.

All terms and conditions of previous permits issued pursuant to permitting programs approved into the State Implementation Plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous permits are superseded by this permit.

The following terms and conditions from previous approvals have been determined no longer applicable; therefore, were not incorporated into this Part 70 permit:

Condition D.1.2: Testing Requirements: The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the particulate matter (PM) limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Reason not incorporated: Condition D.1.2 is unnecessary. Testing requirements are stated in Condition C.10 (Performance Testing) and Condition C.11 (Compliance Requirements).

Condition D.1.3: Monitoring: Monitoring of these facilities is not required by this permit. However, any change or modification to these facilities as specified in 326 IAC 2-1 may require these facilities to have monitoring requirements.

Reason not incorporated: Condition D.1.3 is unnecessary. Monitoring requirements are stated in Condition C.11.

The following terms and conditions from previous permits have been revised:

Condition D.2.1(b) : Volatile Organic Compounds: When operating the thermal oxidizer to achieve the limit for 326 IAC 8-2-4, 2.6 pounds of VOC emitted to the atmosphere per gallon of coating less water delivered to the applicator, the thermal oxidizer shall maintain a minimum 95% capture efficiency and 95% destruction efficiency. These efficiencies and the use of the thermal oxidizer are required by 326 IAC 8-1-2(a). Based upon 326 IAC 8-1-2(c) and the overall control efficiency of 90%, the actual VOC content of the coating shall not exceed 40.2 pounds per gallon of coating solids delivered the applicator.

Reason for revision: Roll Coater, Inc. submitted an application for a minor permit revision on March 15, 2006. Roll Coater, Inc. requested that Condition D.2.1(b) be revised to allow flexibility in the method of control and capture, while keeping an overall control efficiency of 90%. New Source Performance Standard 40 CFR Part 60, Subpart TT requires a VOC emission limit of 0.14 kilograms of VOC per liter of coating solids applied for each calendar month, respectively, or achieve a minimum overall efficiency of 90%. Only an overall control efficiency of 90% is required to maintain this standard. The NSPS does not specify any particular combination of the individual capture and destruction efficiencies that must be met to achieve the overall control efficiency. In addition, state regulation 326 IAC 8-1-2(a)(2) does not reference the capture and destruction efficiencies of the thermal oxidizer. Utilizing the calculations described in 326 IAC 8-1-2(b) and (c), and the emission limit of 2.6 pounds of VOCs per gallon less water, per 326 IAC 8-2-4, a 90% control efficiency would allow a maximum VOC content of 40.2 pounds per gallon of coating solids for compliant coatings. Roll Coater, Inc. maintained that there are numerous combinations of individual capture and destruction efficiencies that can be utilized to achieve the overall control efficiency of 90% when using compliant coatings (less than 40.2 pounds of VOCs per gallon of coating solids), and meet the limit of 2.6 pounds of VOC emitted per gallon of

coating less water. Therefore, Condition D.2.1(b) [now Condition D.2.6(b)] has been revised as follows: "When operating the thermal oxidizer to achieve the limit for 326 IAC 8-2-4, 2.6 pounds of VOC emitted to the atmosphere per gallon of coating less water delivered to the applicator, the thermal oxidizer shall maintain a minimum overall control efficiency of 90%. Based upon 326 IAC 8-1-2(c) and the overall control efficiency of 90%, the actual VOC content of the coating shall not exceed 40.2 pounds per gallon of coating solids delivered the applicator."

Enforcement Issue

There are no enforcement actions pending.

Recommendation

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

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

An administratively complete Part 70 permit renewal application for the purposes of this review was received on March 2, 2003.

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

Emission Calculations

See Appendix A of this document for detailed emission calculations (pages 1 through 11).

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Pollutant	tons/year
PM	1.17
PM10	4.92
SO_2	0.38
VOC	288
CO	54.4
NO_x	64.7

HAPs	tons/year
Glycol Ethers	24.7
Xylene	7.09
Isophrone	8.05
Other HAP	6.41
Total HAP	46.3

(a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of VOC is greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is equal to or greater than twenty-five (25) tons per year.

(c) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Potential to Emit of the Source

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

The source was issued a Part 70 Operating Permit on December 28, 1998. 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 the original Part 70 Operating Permit and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

	Potential to Emit (tons/year)						
Process/emission unit	PM	PM10	SO_2	VOC	CO	NO_X	HAPs
Boiler and Air Make Up	0.21	0.85	0.06	0.61	8.39	11.2	0.22
Metal and Vinyl Coil Coating Line 2 and Line 3	--	--	--	284	--	--	45.7
Line 2 and Line 3 Combustion	0.96	4.07	0.32	2.94	44.9	53.5	1.02
Total PTE	1.17	4.92	0.38	288	53.3	64.7	46.9

(a) This existing stationary source is major for Emission Offset for ozone because the emissions of the nonattainment pollutant, VOC, are greater than one hundred (>100) tons per year.

(b) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3, fugitive emissions are not counted toward the determination of PSD and Emission Offset applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2003 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	--
PM2.5	1
PM10	9
SO_2	0
VOC	103
CO	13
NO_x	16
HAP	1

"-" not reported

County Attainment Status

The source is located in Hancock County.

Pollutant	Status
PM10	Attainment
PM 2.5	Attainment
SO_2	Attainment
NO_2	Attainment
8-hour Ozone	Basic Nonattainment
CO	Attainment
Lead	Attainment

(a) Hancock County has been classified as unclassifiable or attainment for PM2.5. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM 2.5 emissions. Therefore, until the U.S. EPA adopts specific provisions for PSD review for PM2.5 emissions, it has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions. See the State Rule Applicability for the source section.

(b) Volatile organic compounds (VOC) and nitrogen oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to the ozone standards. Hancock County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.

(c) Hancock County has been classified as attainment or unclassifiable in Indiana for PM10, SO_2, NO_2, CO, and lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(d) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 revoking the one-hour ozone standard in Indiana.

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

(a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.

(b) Monitoring and related record keeping requirements which assure that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

(a) This source does involve a pollutant-specific emissions unit (PSEU) as defined in 40 CFR 64.1 for any regulated pollutant. The PSEUs are the two metal coil coating lines, identified as Line 2 and Line 3. They each:

(1) Have a potential to emit before controls equal to or greater than the major source threshold for VOC;

(2) Are subject to an emission limitation or standard for VOC; and

(3) Use a control device as defined in 40 CFR 64.1 to comply with that emission limitation or standard. Therefore, the metal coil coating lines are subject to 40 CFR 64, Compliance Assurance Monitoring (CAM). The Permittee has submitted the following as CAM for these emission units:

(A) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring operating temperature. The output of this system shall be recorded as a 3-hour average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C – Excursions and Exceedances whenever the 3-hour average temperature of the thermal oxidizer is below 1400°F. A 3-hour average temperature that is below 1400°F is not a deviation from this permit. Failure to take response steps in accordance with Section C – Excursions and Exceedances shall be considered a deviation from this permit.

(B) The Permittee shall determine the 3-hour average temperature from the most recent valid stack test that demonstrates compliance with limits in condition D.2.1, as approved by IDEM. On and after the date the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C – Excursions and Exceedances whenever the 3-hour average temperature of the thermal oxidizer is below the 3-hour average temperature as observed during the compliant stack test. A 3-hour average temperature that is below the 3-hour average temperature as observed during the compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C – Excursions and Exceedances shall be considered a deviation from this permit.

(C) The Permittee shall determine fan amperage or duct pressure from the most recent valid stack test that demonstrates compliance with limits in condition D.2.1, as approved by IDEM. The duct pressure or fan amperage shall be observed at least once per day when the thermal oxidizer is in operation. When for any one reading, the duct pressure or fan amperage is outside the normal range as established in most recent compliant stack test, the Permittee shall take reasonable response steps in accordance with Section C – Excursions and Exceedances. A reading that is outside the range as established in the most recent compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C – Excursions and Exceedances shall be considered a deviation from this permit.

(b) The Cleaver Brooks 12.56 Million British thermal units per hour natural gas-fueled firetube boiler is subject to the New Source Performance Standard (40 CFR 60 40c, Subpart Dc). The boiler was constructed in December 1996 which is after the June 9, 1989 applicability date, and the heat input capacity is less than 100 million British thermal units per hour, but greater than 10 million British thermal units per year. Pursuant to this subpart, the Permittee shall record and maintain records of the amount and type of fuel combusted during each month for a period of five years following the date of such record.

(1) 40 CFR 60.40c(a),(b)
(2) 40 CFR 60.41c
(3) 40 CFR 60.48c(a)(1)-(3), (g), (i), (j)

The provisions of 40 CFR 60, Subpart A – General Provisions, which are incorporated as 326 IAC 12-1-1, apply to except when otherwise specified in 40 CFR 60, Subpart Dc. 326 IAC 12 incorporates by reference a version of 40 CFR 60, Subpart Dc that predates the revisions made to 40 CFR 60, Subpart Dc on February 27, 2006.

(c) The one Cleaver Brooks firetube boiler, constructed in 1996, is subject to the National Emission Standards for Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters (40 CFR 63, Subpart DDDDD). This boiler comprises one existing affected source for the small gaseous fuel subcategory, as defined by 40 CFR 63.7506(b), because it meets the criteria in the definition in 40 CFR 63.7575 for the small gaseous fuel subcategory. The provisions of 40 CFR 63 Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the affected source, except when otherwise specified in 40 CFR 63 Subpart DDDDD.

(1) 40 CFR 63.7480
(2) 40 CFR 63.7485
(3) 40 CFR 63.7490(a)(1),(d)
(4) 40 CFR 63.7495(b)
(5) 40 CFR 63.7499
(6) 40 CFR 63.7506(c)(3)
(7) 40 CFR 63.7575

The waste heat boiler from Line 3, exhausting to stacks 14B and 15B, is not subject to this subpart. A waste heat boiler is excluded from the boiler definition in 40 CFR 63.7575.

(d) The prime coater and finish coater (Line 2) is subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.460, Subpart TT) because it is a metal coil surface coating operation that was modified in 1995, which is after the January 5, 1981 applicability date. Pursuant to 40 CFR 60.462(a)(2) and (3), the metal coil coating operation utilizing thermal incineration as a means of controlling VOC emissions shall achieve a minimum overall efficiency of 90%.

(1) 40 CFR 60.460
(2) 40 CFR 60.461
(3) 40 CFR 60.462(a)(1)-(4)
(4) 40 CFR 60.463(a),(b),(c) (1),(c)(2)
(5) 40 CFR 60.464(a),(b),(c)
(6) 40 CFR 60.465
(7) 40 CFR 60.466

(e) The requirements of 40 CFR 60, Subpart TT – Standards of Performance for Metal Coil Surface Coating (326 IAC 12) are not included in this permit for Line 3. Line 3 was constructed in 1968, which is prior to the January 5, 1981 applicability date.

(f) The prime coater and finish coater (Line 2) is subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.580, Subpart FFF) because it is a flexible vinyl and urethane surface coating operation that was modified in 1995, which is after the January 18, 1983 applicability date. Pursuant to this subpart, the coil coating operation utilizing thermal incineration as a means of controlling VOC emissions shall achieve a minimum overall efficiency of 85%. Since this equipment is also subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.460, Subpart TT) and that subpart requires 90% overall efficiency, the requirements of this subpart have been satisfied.

(1) 40 CFR 60.580(a),(b)
(2) 40 CFR 60.581
(3) 40 CFR 60.582(a)(2)
(4) 40 CFR 60.583(a),(d)(1-3),(d)(5)(i)
(5) 40 CFR 60.584(b),(d)
(6) 40 CFR 60.585(a),(b)(3),(c),(d)

(g) The requirements of 40 CFR 60, Subpart FFF – Standards of Performance for Flexible Vinyl and Urethane Coating and Painting (326 IAC 12) are not included in this permit for Line 3. Line 3 was constructed in 1968, which is prior to the January 18, 1983 applicability date.

(h) The degreasing operation is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs), 40 CFR 63.430, Subpart T, because it does not use any of the solvents listed in this rule.

(i) The metal and vinyl coil coating lines, identified as Line 2 and 3, are subject to the National Emission Standards for Hazardous Air Pollutants, 326 IAC 20-64 (40 CFR

63.5080, Subpart SSSS), which was promulgated on June 10, 2002. This subpart applies to each facility that is a major source of HAP (greater than 10 tons per year of a single HAP or 25 tons per year of combined HAP) at which a coil coating line is operated.

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

The provisions of 40 CFR Part 63, Subpart SSSS (National Emission Standards for Hazardous Air Pollutants: Surface Coating of Metal Coil) apply to the affected source. Pursuant to 40 CFR 63.5130(a), the Permittee must comply with these requirements on and after June 10, 2005.

The following emission units comprise the affected source: the collection of all coil coating lines, including Line 2 and Line 3.

(1) 40 CFR 63.5080
(2) 40 CFR 63.5090(a)
(3) 40 CFR 63.5100
(4) 40 CFR 63.5110
(5) 40 CFR 63.5120
(6) 40 CFR 63.5121(a)
(7) 40 CFR 63.5130(a),(d),(e)
(8) 40 CFR 63.5140
(9) 40 CFR 63.5150(a)(3)(i-ii),(a)(4),(b)
(10) 40 CFR 63.5160(b),(c),(d)(1-2),(d)(3)(i),(e)
(11) 40 CFR 63.5170(a),(b),(c)(3),(d)(2),(f)(1)(i-iv and ix),(g)(3),(g)(6-8)(i)
(12) 40 CFR 63.5180(a),(b)(3-4),(c)-(h)
(13) 40 CFR 63.5190(a)
(14) 40 CFR 63.5200
(15) Table 1 and Table 2

The provisions of 40 CFR 63 Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, are not included in this permit for the Cleaver Brooks firetube boiler. The boiler is exempted by 40 CFR 63.7506 (c).

(j) The cooling towers are not subject to the requirements of 40 CFR 63, Subpart Q – National Emission Standards for Hazardous Air Pollutants for Industrial Process Cooling Towers (326 IAC 20-4) because the Permittee does not use chromium-based water treatment chemicals.

State Rule Applicability – Entire Source

326 IAC 2-2 Prevention of Significant Deterioration (PSD)

The source was previously a major source under PSD because the potential to emit VOC is greater than 250 tons per year. The metal and vinyl coil coating line (Line 2) were modified in 1995 and 1997 (CP059-45112-00002). The total potential to emit from these modifications were less than 40 tons per year. Therefore, this modification was not subject to PSD review.

On June 15, 2004, Hancock County was designated non-attainment for ozone. The VOC emissions, which are considered when evaluating the rule applicability relating to ozone, have been reviewed pursuant to the requirements of Emission Offset, 326 IAC 2-3. Therefore, this source is no longer a major source under PSD, because the potential to emit of all attainment pollutants are less than 250 tons per year.

326 IAC 2-3 (Emission Offset)

Hancock County has been designated as nonattainment for ozone under the 8-hour standard. This designation became effective on June 15, 2004. VOC and NOx emissions, which are precursors for the formation of ozone, are considered when evaluating the rule applicability

relating to ozone. A major source in a nonattainment area is a source that emits or has the potential to emit 100 tpy or greater of any regulated pollutant. Roll Coater, Inc. has a potential to emit VOC greater than 100 tons per year. Therefore, this source is considered to be an existing major source under Emission Offset (326 IAC 2-3) for ozone.

No modifications have been made to the source after the nonattainment area designation was made.

326 IAC 2-6 (Emission Reporting)

Since this source is required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program, this source is subject to 326 IAC 2-6 (Emission Reporting). In accordance with the compliance schedule in 326 IAC 2-6-3, an emission statement must be submitted triennially by July 1 beginning in 2005 and every 3 years after. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

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 in 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 6-5 (Fugitive Particulate Matter Emission Limitations)

This source is not located in a county listed in 326 IAC 6-5-1(a) and has not added a facility with the potential to emit fugitive particulate matter greater than 25 tons per year (which requires a permit as set forth in 326 IAC 2), after December 13, 1985. Therefore, this source is not subject to the requirements of 326 IAC 6-5.

326 IAC 8-6 (Organic Solvent Emission Limitations)

This source is located in Hancock County and was constructed prior to October 7, 1974; therefore, the requirements of 326 IAC 8-6 do not apply.

State Rule Applicability – 12.56 MMBtu Cleaver Brooks natural gas fired boiler

316 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating)

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating: Emission limitations for facilities specified in 326 IAC 6-2-1(d)), the PM emissions from the Cleaver Brooks natural gas-fueled boiler, identified as Boiler, shall not exceed 0.56 pound per million Btu heat input (lb/MMBtu). This limitation was calculated using the following equation:

$$Pt = \frac{1.09}{Q^{0.26}}$$ Where Q = total source capacity (MMBtu/hr)

For this, Q = 12.56 (MMBtu/hr) Pt = 0.56

Based on AP-42 emission factors, the emission rate of particulate from natural gas combustion is 7.6 lbs per MMcf of natural gas burned, which is equivalent to 0.0072 lbs per MMBtu. Therefore, the boiler is able to comply with this limit.

326 IAC 7-1.1-1 (Sulfur Dioxide Emission Limitations)

The boiler has a potential to emit SO_2 of less than 25 tons per year and less than 10 pounds per day; therefore, the requirements of 326 IAC 7-1.1-1 do not apply.

326 IAC 12 (New Source Performance Standards)

The one Cleaver Brooks natural gas-fueled boiler is subject to the recordkeeping requirements of 326 IAC 12 because it has a heat input capacity greater than 10 MMBtu per hour but less than 100 MMBtu per hour, was constructed after June 9, 1989, and is defined as a "steam generating unit" pursuant to 40 CFR 60.41c. Pursuant to this rule, the Permittee shall keep daily records of the fuel burned in the boiler. 326 IAC 12 incorporates by reference a version of 40 CFR 60, Subpart Dc that predates the revisions made to 40 CFR 60, Subpart Dc on February 27, 2006. This condition is not federally enforceable.

State Rule Applicability – Line 3 Air Make-up Units

326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating)

Although constructed after September 21, 1983, the Line 3 Air Make-up unit is not subject to the requirements of 326 IAC 6-2-4 because it is not an indirect heating unit as defined in 326 IAC 1-2-19 (Combustion for Indirect Heating Definition).

326 IAC 7-1.1-1 (Sulfur Dioxide Emission Limitations)

The Line 3 Air Make-up unit has a potential to emit SO_2 of less than 25 tons per year and less than 10 pounds per day. Therefore, 326 IAC 7-1.1-1 is not applicable to this emission unit.

State Rule Applicability – Metal and Vinyl Coating Line (Line 2) and Metal Coil Coating Line (Line 3)

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

The metal and vinyl coil coating lines, identified as Line 2 and Line 3, are not subject to 326 IAC 6-3 (Particulate Matter Limitations for Manufacturing Operations). Pursuant to 326 IAC 6-3-1(b)(6), surface coating operations that utilize roll coating are exempt from this rule.

326 IAC 8-2-4 (Surface Coating Emission Limitations)

The prime coater room and finish coater room (Line 2) and the prime and finish coater room (Line 3) are subject to the requirements of 326 IAC 8-2-4 (Surface Coating Emission Limitations) because they were existing facilities as of January 1, 1980 which are located at a source with potential volatile organic compounds (VOC) emissions of one hundred (100) tons per year or greater.

Pursuant to 326 IAC 8-2-4 (Surface Coating Emission Limitations), the Permittee shall not allow or permit the discharge into the atmosphere of any volatile organic compound in excess of 2.6 pounds per gallon of coating, excluding water.

When operating the thermal oxidizer to achieve the limit for 326 IAC 8-2-4, 2.6 pounds of VOC emitted to the atmosphere per gallon of coating less water delivered to the applicator, the thermal oxidizer shall maintain an overall minimum control efficiency of 90%. Based upon 326 IAC 8-1-2(c) and the overall control efficiency of 90%, the actual VOC content of the coating shall not exceed 40.2 pounds per gallon of coating solids delivered to the applicator.

Pursuant to CP 059-4512-00002, issued October 4, 1995, the capture systems, and the capture systems' monitoring devices shall be operating properly during actual coating operations (i.e., when coating is being applied and the coating contains VOC), at a pressure differential across the enclosure that has been demonstrated to maintain an average facial velocity of at least 200 feet per minute across all natural draft openings. All doors and windows not classified as natural draft openings shall remain closed during actual coating operations (i.e., when coating is being applied and the coating contains VOC). The thermal oxidizers and their measuring and recording devices shall be operating properly during actual coating operation, at a minimum operating temperature that has been demonstrated by compliance tests to achieve a minimum 90% overall reduction efficiency.

State Rule Applicability – Insignificant Brazing, Cutting, Welding, Grinding and Machining

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

The insignificant grinding and machining operations, including deburring, buffing, polishing,

abrasive blasting, pneumatic conveying and woodworking operations are subject to 326 IAC 6-3-2(e). Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emission rate from the coal storage and processing system shall not exceed an amount determined by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

E = 4.10 P 0.67 where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour.

The insignificant brazing, cutting, soldering, and welding equipment is exempt from the requirements of 326 IAC 6-3 pursuant to 326 IAC 6-3-1(b). The welding operation has less than 625 pounds rod and wire consumed and less than 3,400 inches per hour of stack 1" thick or less is cut.

State Rule Applicability – Insignificant Degreasing Operations

326 IAC 8-3-1 (Organic Solvent Degreasing Operations)
The insignificant degreasing operations are not subject to 326 IAC 8-3 (Organic Solvent Degreasing Operations) because they were installed prior to the January 1, 1980 and are located in Hancock County.

Testing Requirements

Pursuant to 326 IAC 8-2-4, the Permittee shall perform VOC testing using coatings that are equal to or greater than ninety percent (90%) worst-case potential VOC emissions utilizing Method 25 (40 CFR 60, Appendix A), or other methods as approved by the Commissioner for both Lines 2 and 3. This test was completed on November 18, 2005, for Line 2 and Line 3. This test shall be repeated every five years from the date of this valid compliance demonstration.

Compliance Requirements

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

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also 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 approporiate corrective actions within a specific time period.

(a) The compliance determination requirements applicable to metal and vinyl coating lines, Line 2 and Line 3 are as follows:

(1) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring operating temperature. The output of this system shall be recorded as a 3-hour average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C – Excursions and Exceedances whenever the 3-hour average temperature of the thermal oxidizer is below 1400°F. A 3-hour average temperature that is below 1400°F is not a

deviation from this permit. Failure to take response steps in accordance with Section C – Excursions and Exceedances shall be considered a deviation from this permit.

(2) The Permittee shall determine the 3-hour average temperature from the most recent valid stack test that demonstrates compliance with limits in condition D.2.1, as approved by IDEM.

(3) On and after the date the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C – Excursions and Exceedances whenever the 3-hour average temperature of the thermal oxidizer is below the 3-hour average temperature as observed during the compliant stack test. A 3-hour average temperature that is below the 3-hour average temperature as observed during the compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C – Excursions and Exceedances shall be considered a deviation from this permit.

(4) The Permittee shall determine fan amperage from the most recent valid stack test that demonstrates compliance with limits in condition D.2.1, as approved by IDEM.

(5) The fan amperage shall be observed at least once per day when the thermal oxidizer is in operation. When for any one reading, the duct pressure or fan amperage is outside the normal range as established in most recent compliant stack test, the Permittee shall take reasonable response steps in accordance with Section C – Excursions and Exceedances. A reading that is outside the range as established in the most recent compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C – Excursions and Exceedances shall be considered a deviation from this permit.

These monitoring conditions are necessary because the thermal incinerator for the metal and vinyl coal coating lines must operate properly to ensure compliance with 326 IAC 8-2-4, and 326 IAC 2-7 (Part 70).

Conclusion

The operation of this stationary coil coating operation shall be subject to the conditions of this Part 70 permit T059-17551-00002.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
One (1) 12.6 MMBtu/hr Boiler

Company Name: **Roll Coater, Inc.**
Address: **1950 E. Main Street, Greenfield, Indiana 46140**
Title V Permit Number: **059-17551-00002**
Plt ID: **059-00002**
Reviewer: **ERG/TDP**
Date: **April 10, 2007**

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
12.6	110

	Pollutant					
	PM*	PM10*	SO_2	NO_x	VOC	CO
Emission Factor in lb/MMCF	1.8	7.6	0.6	100	5.5	84
Potential to Emit in tons/yr	0.10	0.42	0.03	5.50	0.30	4.62

*PM and PM10 emission factors are filterable and condensible PM10 combined.
**Emission factor for NOx: Uncontrolled = 100 lb/MMCF

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas
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)

Methodology
Potential Throughput (MMCF/yr) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Potential to Emit (tons/yr) = Potential Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000

See page 2 for HAPs emissions calculations.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
One (1) 12.6 MMBtu/hr Boiler
HAPs Emissions

Company Name: **Roll Coater, Inc.**
Address: **1950 E. Main Street, Greenfield, Indiana 46140**
Title V Permit Number: **059-17551-00002**
Plt ID: **059-00002**
Reviewer: **ERG/TDP**
Date: **April 10, 2007**

	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential to Emit in tons/yr	1.16E-04	6.60E-05	4.13E-03	9.90E-02	1.87E-04

	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential to Emit in tons/yr	2.75E-05	6.05E-05	7.70E-05	2.09E-05	1.16E-04

Methodology is the same as page 1.

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

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
One (1) 12.96 MMBtu Air Make-Up Unit

Company Name: **Roll Coater, Inc.**
Address: **1950 E. Main Street, Greenfield, Indiana 46140**
Title V Permit Number: **059-17551-00002**
Plt ID: **059-00002**
Reviewer: **ERG/TDP**
Date: **April 10, 2007**

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
13.0	114

	Pollutant					
	PM*	PM10*	SO_2	NO_x	VOC	CO
Emission Factor in lb/MMCF	1.8	7.6	0.6	100	5.5	84
Potential to Emit in tons/yr	0.10	0.43	0.03	5.68	0.31	4.77

*PM and PM10 emission factors are filterable and condensible PM10 combined.
**Emission Factors for NOx: Uncontrolled lb/MMCF.

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas
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)

Methodology
Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Potential to Emit (tons/yr) = Potential Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See page 4 for HAPs emissions calculations.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
One (1) 12.96 MMBtu Air Make-Up Unit
HAPs Emissions

Company Name: Roll Coater, Inc.
Address: 1950 E. Main Street, Greenfield, Indiana 46140
Title V Permit Number: 059-17551-00002
Plt ID: 059-00002
Reviewer: ERG/TDP
Date: April 10, 2007

	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential to Emit in tons/yr	1.19E-04	6.81E-05	4.26E-03	1.02E-01	1.93E-04

	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential to Emit in tons/yr	2.84E-05	6.24E-05	7.95E-05	2.16E-05	1.19E-04

Methodology is the same as page 3.

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

Appendix A: Emissions Calculations
Metal and Vinyl Coil Coating Lines
HAP Emissions

Company Name: **Roll Coater, Inc.**
Address: **1950 E. Main Street, Greenfield, Indiana 46140**
Title V Permit Number: **059-17551-00002**
Plt ID: **059-00002**
Reviewer: **ERG/TDP**
Date: **April 10, 2007**

Emission Units: Line 2 & Line 3

Assumptions:
1. The factors given in AP-42, Section 4.2.2.10, *Metal Coil Surface Coating,* represent the emissions from the coating lines.
2. As stated in AP-42, 95% of the quench emissions are directed into the ovens.
3. The overall destruction efficiency of the ovens and afterburner (in series) is 98%.
4. All the HAPs are evaporative losses. Amount lost as waste is negligible.

The following percentages are from AP-42, Section 4.2.2.10.2,

The % of total HAP emissions from the coaters:	8%
The % of total HAP emissions from the ovens & incinerators:	90%
The % of total HAP emissions from the quench:	2%
% of quench emissions redirected to the ovens:	95%
% emitted from quench stacks (5% of 2%):	0.10%
% going through ovens (90% + (95% of 2%):	91.9%
Control efficiency of ovens/afterburner stacks:	98%
% emitted through the ovens/afterburner stacks:	1.84%

Maximum Potential to Emit Calculations:
Maximum Potential to Emit HAP = Actual HAP (tpy) x Max hours of operation 8760 hr/ Actual hours of operation 7488 hr
Actual 1995 HAP usage:

	Actual 1995 HAP usage:	Maximum HAP usage:	Emitted from ovens/after-burners (1.84%):	Emitted from coaters (8%):	Emitted from quench (0.10%)	Emissions after controls:
Line 2 (tpy)						
Benzene	0	0	0.000	0.000	0.000	0.000
Cumene	0.38	0.44	0.008	0.036	0.000	0.044
Dimethyl Formamide	0.26	0.31	0.006	0.025	0.000	0.031
Dimethyl Phthalate	1.32	1.54	0.028	0.123	0.002	0.153
Ethylbenzene	1.00	1.18	0.022	0.094	0.001	0.117
Ethylene Glycol	2.45	2.87	0.053	0.230	0.003	0.285
Formaldehyde	0.20	0.23	0.004	0.018	0.000	0.023
Glycol Ethers	38.3	44.8	0.824	3.58	0.045	4.45
Isophrone	21.1	24.7	0.455	1.98	0.025	2.46
Methanol	0	0.00	0.000	0.000	0.000	0.000
MIBK	0.48	0.56	0.010	0.045	0.001	0.056
Naphthalene	5.03	5.88	0.108	0.471	0.006	0.585
Phenol	0	0.00	0.000	0.000	0.000	0.000
Phosphorus	0	0.00	0.000	0.000	0.000	0.000
Toluene	0.97	1.13	0.021	0.091	0.001	0.113
Xylenes	7.76	9.08	0.167	0.726	0.009	0.902
Total:	**79.3**	**92.7**	**1.71**	**7.42**	**0.09**	**9.22**
Line 3 (tpy)						
Benzene	0	0	0	0.000	0.000	0.000
Cumene	2.58	3.02	0.056	0.241	0.003	0.300
Dimethyl Formamide	0	0.00	0.000	0.000	0.000	0.000
Dimethyl Phthalate	0.33	0.39	0.007	0.031	0.000	0.038
Ethylbenzene	5.33	6.24	0.115	0.499	0.006	0.620
Ethylene Glycol	2.4	2.81	0.052	0.225	0.003	0.279
Formaldehyde	0.82	0.96	0.018	0.077	0.001	0.095
Glycol Ethers	175	204	3.76	16.3	0.204	20.3
Isophrone	48.1	56.2	1.03	4.50	0.056	5.59
Methanol	0	0.00	0.000	0.000	0.000	0.000
MIBK	1.93	2.26	0.042	0.181	0.002	0.224
Naphthalene	18.8	21.98	0.404	1.76	0.022	2.18
Phenol	0	0.00	0.000	0.000	0.000	0.000
Phosphorus	0	0.00	0.000	0.000	0.000	0.000
Toluene	0.46	0.54	0.010	0.043	0.001	0.053
Xylenes	53.2	62.2	1.15	4.98	0.062	6.19
Total	**308**	**361**	**6.64**	**28.9**	**0.36**	**35.9**
Maximum PTE from Line 2 & Line 3:	**388**	**454**	**8.35**	**36.3**	**0.454**	**45.1**

Appendix A: Emissions Calculations
Metal and Vinyl Coil Coating Lines
VOC Emissions

Company Name: **Roll Coater, Inc.**
Address: **1950 E. Main Street, Greenfield, Indiana 46140**
Title V Permit Number: **059-17551-00002**
Plt ID: **059-00002**
Reviewer: **ERG/TDP**
Date: **April 10, 2007**

Emission Units: Line 2 & Line 3

Assumptions:
1. The factors given in AP-42, Section 4.2.2.10, *Metal Coil Surface Coating,* represent the emissions from the coating lines.
2. As stated in AP-42, 95% of the quench emissions are directed into the ovens
3. The overall destruction efficiency of the ovens and afterburner (in series) is 98%.
4. All VOC emissions are evaporative losses. Amount lost as waste is negligible

The following percentages are from AP-42, Section 4.2.2.10.2,

The % of total VOC emissions from the coaters:	8%
The % of total VOC emissions from the ovens & incinerators:	90%
The % of total VOC emissions from the quench:	2%

Maximum Potential to Emit Calculations:

Total VOCs used in 2000 on this line:		243 tons/yr
Actual Operating Hours in 2000:		7488 hrs (6 days/wk, 24 hr/day, 52 wk/yr)
Maximum Potential VOC:	=	243 tons/yr x 8760 hr max/7488 hr actual
	=	284
Amount emitted through coater room stacks:	=	284 x 8%
		22.7 tons/yr
Amount lost through quenching:	=	284 x 2%
		5.69 tons/yr
Amount redirected to the ovens:	=	95% of total losses from quenching
Amount emitted through quench stacks:	=	0.284 tons/yr
Backdraft from quenching:	=	5.40 tons/yr
Amount emitted to the ovens from:		
Coating/curing operations:	=	90%
	=	284 x 90%
	=	256 tons/yr
Backdraft from quenching:	=	5.40 tons/yr
Total emitted to ovens:	=	261 tons/yr
Overall control efficiency of the ovens/afterburner:	=	98%
Amount emitted to afterburner stacks:	=	261 x (1-Control Efficiency)
	=	5.22 tons/yr

Emissions Summary:
Uncontrolled emissions: = 284 tons/yr
Emissions after Controls:

Operation	Emissions (tpy)
Coater Rooms	22.7
Quench Stacks	0.284
Ovens/Afterburner	5.22
Total:	28.3

Appendix A: Emissions Calculations
Fugitive PM
Paved Roads

Company Name: **Roll Coater, Inc.**
Address: **1950 E. Main Street, Greenfield, Indiana 46140**
Title V Permit Number: **059-17551-00002**
Plt ID: **059-00002**
Reviewer: **ERG/TDP**
Date: **April 10, 2007**

Fugitive Emissons from Paved Roads

Service Type*	Miles/Trip	Trucks/hr	Hrs/Day	Days/yr	Miles/yr (VMT)
Shipping	0.49	8	24	250	23520
Receiving	0.25	8	24	250	12000
Supplies	0.4	0.16	24	250	384
Typical Vehicle Miles Traveled/yr for the facility =					35904

*Trip includes entry and exit from the facility for each service type.
Average silt loading for low ADT (<5000 trucks/day) is used in determining the emission factor.

Methodology is from AP-42, Section 13.2.1, Paved Roads

Fugitive PM-10 Emissions

Emission factor for fugitive PM-10 from paved roads is:

EF = $k(sL/2)^{0.65}*(W/3)^{1.5}$

Where,

Mean Vehicle Weight (W)	=	40	ton
k factor (dimensionless)	=	0.016	(for PM-10)
Silt Loading (sL)	=	25	gm/m^2

Therefore, EF = 4.02 lb/VMT

PM-10 Emissions = EF x VMT
= 144,432 lbs/yr
= **72.2 tons/yr**

Appendix A: Emissions Calculations
Natural Gas Combustion Only
From Line 2

Company Name: **Roll Coater, Inc.**
Address: **1950 E. Main Street, Greenfield, Indiana 46140**
Title V Permit Number: **059-17551-00002**
Plt ID: **059-00002**
Reviewer: **ERG/TDP**
Date: **May 5, 2006**

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
73.2	641

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.8	7.6	0.6	100.0	5.5	84.0
Potential to Emit in tons/yr	0.58	2.44	0.19	32.0	1.76	26.9

*PM and PM10 emission factor are filterable and condensible PM and PM10 combined.
**Emission Factors for NOx: Uncontrolled = 100 lb/MMCF.

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas
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)

Methodology
Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Potential to Emit (tons/yr) = Potential Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See page 9 for HAPs emissions calculations.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
From Line 2

Company Name: Roll Coater, Inc.
Address: 1950 E. Main Street, Greenfield, Indiana 46140
Title V Permit Number: 059-17551-00002
Plt ID: 059-00002
Reviewer: ERG/TDP
Date: April 10, 2007

	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential to Emit in tons/yr	6.73E-04	3.84E-04	2.40E-02	5.77E-01	1.09E-03

	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential to Emit in tons/yr	1.60E-04	3.52E-04	4.49E-04	1.22E-04	6.73E-04

Methodology is the same as page 8.

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

Appendix A: Emissions Calculations
Natural Gas Combustion Only
From Line 3

Company Name: **Roll Coater, Inc.**
Address: **1950 E. Main Street, Greenfield, Indiana 46140**
Title V Permit Number: **059-17551-00002**
Plt ID: **059-00002**
Reviewer: **ERG/TDP**
Date: **May 5, 2006**

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
49.1	430

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.8	7.6	0.6	100.0	5.5	84.0
Potential to Emit in tons/yr	0.39	1.63	0.13	21.5	1.18	18.1

*PM and PM10 emission factor are filterable and condensible PM and PM10 combined.
**Emission Factors for NOx: Uncontrolled = 100 lb/MMCF.

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas
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)

Methodology
Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Potential to Emit (tons/yr) = Potential Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See page 11 for HAPs emissions calculations.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
From Line 3

Company Name: Roll Coater, Inc.
Address: 1950 E. Main Street, Greenfield, Indiana 46140
Title V Permit Number: 059-17551-00002
Plt ID: 059-00002
Reviewer: ERG/TDP
Date: April 10, 2007

	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential to Emit in tons/yr	4.52E-04	2.58E-04	1.61E-02	3.87E-01	7.31E-04

	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential to Emit in tons/yr	1.08E-04	2.37E-04	3.01E-04	8.17E-05	4.52E-04

Methodology is the same as page 10.

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