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Part 70 Operating Permit Renewal OFFICE OF AIR QUALITY

**Roll Coater, Inc.
858 E. Hupp Road
LaPorte, Indiana 46350**

(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.

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| Operation Permit No.: T091-17589-00040 | |
| Issued by: | Issuance Date: |
| Chrystal A. Wagner, Section Chief Permits Branch Office of Air Quality | 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: | 858 E. Hupp Road, LaPorte, Indiana 46350 |
| Mailing Address: | 858 E. Hupp Road, LaPorte, Indiana 46350 |
| General Source Phone Number: | 219-393-2055 |
| SIC Code: | 3479 |
| County Location: | LaPorte |
| Source Location Status: | Attainment for all criteria pollutants |
| Source Status: | Part 70 Operating Permit Program Minor Source, under PSD Major Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories |

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) metal coil coating line, identified as Line 5, constructed in 1979, with maximum capacity of 200 gallons of coating per hour, using two (2) thermal oxidizers as control, consisting of the following equipment:
- (1) One (1) #3 steering exhaust, exhausting to one (1) stack 17;
 - (2) One (1) brush unit, used for surface preparation prior to coating, exhausting to one (1) stack 18;
 - (3) One (1) wet section (stages 5-16), exhausting to one (1) stack 19;
 - (4) One (1) preclean (stages 1-4), exhausting to one (1) stack 20;
 - (5) One (1) finish coater room, exhausting to one (1) stack 21;
 - (6) One (1) prime coater room, exhausting to one (1) stack 22;
 - (7) One (1) waste heat fueled finish boiler, heat for this boiler is provided by the finish afterburner with a maximum heat input capacity of 20 million British thermal units per hour (MMBtu/hr), exhausting to one (1) stack 23;
 - (8) One (1) natural gas fired finish oven, with a maximum heat input capacity of 48 million British thermal units per hour (MMBtu/hr), exhausting to one (1) stack 24;
 - (9) One (1) natural gas fired prime oven, with a maximum heat input capacity of 48 million British thermal units per hour (MMBtu/hr), exhausting to one (1) stack 25;

- (10) One (1) waste heat fueled prime boiler, heat for this boiler is provided by the prime afterburner with a maximum heat input capacity of 20 million British thermal units per hour (mmBtu/hr), exhausting to one (1) stack 26; and
- (11) One (1) cooling tunnel, exhausting to one (1) stack 27.

Under 40 CFR 63, Subpart SSSS, the coating application stations and associated curing ovens are considered metal coil surface coating operations.

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) One (1) natural gas fueled west standby boiler, identified as Boiler (West), constructed in 1974, with a maximum heat input capacity of 13.39 million British thermal units per hour (MMBtu/hr), exhausting to one (1) stack 12. [326 IAC 6-2-3]
- (b) Paved and unpaved roads and parking lots with public access; [326 IAC 6-4]

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, T091-17589-00040, 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 the "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) including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (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 PMPs do 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, and Northwest Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

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

Facsimile Number: 317-233-6865
Northwest Regional Office phone: (219) 757-0265; fax: (219) 757-0267.

- (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 T091-17589-00040 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 Termination of Right to Operate [326 IAC 2-7-10][326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

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

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
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.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)][326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
- (1) That this permit contains a material mistake.

- (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
- (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-3][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.18 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12]

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

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

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
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.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)]
[326 IAC 2-7-12(b)(2)]

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

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

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b),(c), or (e) without a prior permit revision, if each of the following conditions is met:
- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
 - (3) The changes do not result in emissions which exceed the 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 emission 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.21 Source Modification Requirement [326 IAC 2-7-10.5]

- (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 and/or 326 IAC 2-3 (for sources located in NA areas).

B.22 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.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
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.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.25 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), particulate emissions 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 forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

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

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

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

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).

C.6 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

C.7 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 RACM 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.8 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 not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.9 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.10 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.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

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

C.12 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.
- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

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

C.13 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.14 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.15 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 (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; and/or
 - (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.16 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 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.17 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(a)(1), the Permittee shall submit by July 1 of each year 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.18 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.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [326 IAC 2-2] [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) 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.20 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 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (1) One (1) natural gas fueled west standby boiler, constructed in 1974, identified as Boiler (West), with a maximum heat input capacity of 13.39 million British thermal units per hour (mmBtu/hr), exhausting to one (1) stack (12);

(The information describing the process contained in this emissions unit 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 Matter (PM) [326 IAC 6-2-3]

Pursuant to 326 IAC 6-2-3 (Emission limitations for facilities specified in 326 IAC 6-2-1(c)), the particulate matter (PM) emissions from the one (1) standby boiler (west), constructed in 1974, with a maximum heat capacity of 13.39 million British thermal units per hour using natural gas as fuel shall be limited to 0.6 pounds per million British thermal unit.

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.

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) metal coil coating line, constructed in 1979, identified as Line 5, with maximum capacity of 200 gallons of coating per hour, using two (2) thermal oxidizers as control, consisting of the following equipment:
- (1) One (1) #3 steering exhaust, exhausting to one (1) stack (17);
 - (2) One (1) brush unit, used for surface preparation prior to coating, exhausting to one (1) stack (18);
 - (3) One (1) wet section (stages 5-16), exhausting to one (1) stack (19);
 - (4) One (1) preclean (stages 1-4), exhausting to one (1) stack (20);
 - (5) One (1) finish coater room, exhausting to one (1) stack (21);
 - (6) One (1) prime coater room, exhausting to one (1) stack (22);
 - (7) One (1) waste heat fueled finish boiler, heat for this boiler is provided by the finish afterburner with a maximum heat input capacity of 20 million British thermal units per hour (mmBtu/hr), exhausting to one (1) stack (23);
 - (8) One (1) natural gas fired finish oven, with a maximum heat input capacity of 48 million British thermal units per hour (mmBtu/hr), exhausting to one (1) stack (24);
 - (9) One (1) natural gas fired prime oven, with a maximum heat input capacity of 48 million British thermal units per hour (mmBtu/hr), exhausting to one (1) stack (25);
 - (10) One (1) waste heat fueled prime boiler, heat for this boiler is provided by the prime afterburner with a maximum heat input capacity of 20 million British thermal units per hour (mmBtu/hr), exhausting to one (1) stack (26); and
 - (11) One (1) cooling tunnel, exhausting to one (1) stack (27).

Under 40 CFR 63, Subpart SSSS, the coating application stations and associated curing ovens are considered metal coil surface coating operations.

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

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

D.2.1 PSD Minor Limit for VOC [326 IAC 2-2]

Actual VOC emissions from metal coil coating line 5 including coatings, dilution solvents and cleaning solvents shall be less than 245 tons per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance with this limit, combined with the potential to emit VOC from other emission units at the source, shall limit the VOC from the entire source to less than 250 tons per twelve (12) consecutive month period and render 326 IAC 2-2 not applicable.

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 these facilities and any control devices.

Compliance Determination Requirements

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

In order to demonstrate compliance with Condition D.2.1, the Permittee shall perform overall control efficiency testing of the regenerative thermal oxidizers for VOC and determine the 3-hour average temperature and fan amperage or duct pressure utilizing methods approved by the Commissioner. This test shall be performed on or before November 8, 2010, for the metal coil coating Line 5 and 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 Compound (VOC)

The thermal oxidizers for VOC control shall be operating properly at all times during actual coating operations (i.e., when coater heads are engaged and coating contains VOC).

D.2.5 VOC Emissions

- (a) VOC input shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.
- (b) In order to demonstrate compliance with the VOC emission limitation in Condition D.2.1, the Permittee shall determine VOC emissions for each month, using the following methodology:

$$\text{VOC Emissions} = (\text{VOC input}) \times (1 - \text{CE})$$

Where:

VOC input= Metal coil coating line 5 VOC input
CE= Overall control efficiency of the thermal oxidizers from the most recent stack test approved by IDEM

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

D.2.6 Thermal Incinerator [40 CFR 64]

- (a) A continuous monitoring system shall be calibrated, maintained, and operated on the regenerative thermal oxidizer for measuring operating temperature. Continuous means measuring temperature at an interval of once per 15 minutes. The output of this system shall be recorded as a three (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 – Response to Excursions or Exceedances whenever the three (3) hour average temperature of the regenerative thermal oxidizer is below 1225°F (from 2005 stack test). A three (3) hour average temperature that is below 1225°F (from 2005 stack test) is not a deviation from this permit. Failure to take response steps in accordance with Section C – Response to Excursions or Exceedances shall be considered a deviation from this permit.
- (b) The Permittee shall determine the three (3) hour average temperature from the most recent valid stack test that demonstrates compliance with the limits in conditions D.2.1

and D.2.3, as approved by IDEM.

- (c) On and after the date the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C – Response to Excursions or Exceedances whenever the three (3) hour average temperature of the regenerative thermal oxidizer is below the three (3) hour average temperature as observed during the compliant stack test. A three (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 – Response to Excursions or Exceedances shall be considered a deviation from this permit.

D.2.7 Parametric Monitoring [40 CFR 64]

- (a) The Permittee shall determine pressure differential across the enclosure from the most recent valid stack test that demonstrates compliance with limits in condition D.2.1, as approved by IDEM.
- (b) The pressure differential across the enclosure shall be observed at least once per day when the thermal oxidizer is in operation. When for any one reading, the pressure differential 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.2.8 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 usage limits and/or the VOC emission limits established in Condition D.2.1.
 - (1) The VOC content of each coating material and solvent used.
 - (2) The amount of coating material and solvent less water used.
 - (A) Records shall include purchase orders, invoices, material safety data sheets (MSDS) or other documentation necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (3) The cleanup solvent usage for each month;
 - (4) The total VOC usage for each month; and
- (b) To document compliance with Condition D.2.7, the Permittee shall maintain a daily record of the pressure across the enclosure. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading, (e.g. the process did not operate that day).
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.9 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.2.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION E.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (2) One (1) metal coil coating line, constructed in 1979, identified as Line 5, with maximum capacity of 200 gallons of coating per hour, using two (2) thermal oxidizers as control, consisting of the following equipment:
- (E) One (1) finish coater room, exhausting to one (1) stack (21);
 - (F) One (1) prime coater room, exhausting to one (1) stack (22);
 - (G) One (1) waste heat fueled finish boiler, heat for this boiler is provided by the finish afterburner with a maximum heat input capacity of 20 million British thermal units per hour (mmBtu/hr), exhausting to one (1) stack (23);
 - (H) One (1) natural gas fired finish oven, with a maximum heat input capacity of 48 million British thermal units per hour (mmBtu/hr), exhausting to one (1) stack (24);
 - (I) One (1) natural gas fired prime oven, with a maximum heat input capacity of 48 million British thermal units per hour (mmBtu/hr), exhausting to one (1) stack (25);
 - (J) One (1) waste heat fueled prime boiler, heat for this boiler is provided by the prime afterburner with a maximum heat input capacity of 20 million British thermal units per hour (mmBtu/hr), exhausting to one (1) stack (26); and
 - (K) One (1) cooling tunnel, exhausting to one (1) stack (27).

Under 40 CFR 63, Subpart SSSS, the coating application stations and associated curing ovens are considered metal coil surface coating operations.

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

E.1.1 General Provisions Relating to National Emissions Standards for Hazardous Air Pollutants under 40 CFR Part 63 [326 IAC 20-1][40 CFR Part 63, Subpart A]

Pursuant to 40 CFR 63.5140, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1, as specified in Table 2 of 40 CFR Part 63, Subpart SSSS in accordance with schedule in 40 CFR Part 63, Subpart SSSS.

E.1.2 Surface Coating of Metal Coil NESHAP [40 CFR Part 63, Subpart SSSS]

The portions of the metal coil coating line to which the emission limitations apply are the coating application stations and associated curing ovens. The Permittee which engages in surface coating of metal coil shall comply with the provisions of 40 CFR Part 63, Subpart SSSS, as follows:

What This Subpart Covers

§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.

Emission Standards and Compliance Dates

§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.

General Requirements for Compliance with the Emission Standards and for Monitoring and Performance Tests

§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 $\pm 1^{\circ}$ 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.

- (iii) For a catalytic oxidizer, if you are demonstrating continuous compliance with the operating limit established according to §63.5160(d)(3)(ii)(A) and (B), then you must install the thermocouples or temperature sensors in the vent stream at the nearest feasible point to the inlet and outlet of the catalyst bed. Calculate the temperature difference across the catalyst. If you are demonstrating continuous compliance with the operating limit established according to §63.5160(d)(3)(ii)(C) and (D), then you must install the thermocouple or temperature sensor in the vent stream at the nearest feasible point to the inlet of the catalyst bed.
- (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). |

- (a) If you use a control device to comply with the requirements of §63.5120, you are not required to conduct a performance test to demonstrate compliance if one or more of the criteria in paragraphs (a)(1) through (3) of this section are met:
 - (1) The control device is equipped with continuous emission monitors for determining total organic volatile matter concentration, and capture efficiency has been determined in

- accordance with the requirements of this subpart; and the continuous emission monitors are used to demonstrate continuous compliance in accordance with §63.5150(a)(2); or
- (2) You have received a waiver of performance testing under §63.7(h); or
 - (3) The control device is a solvent recovery system and you choose to comply by means of a monthly liquid-liquid material balance.
- (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:

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

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:

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

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.

Requirements for Showing Compliance

§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.

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

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.

V_{si} = 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:

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

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 , 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:

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

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.

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.

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.
- (1) If the affected source uses one compliance procedure to limit organic HAP emissions to the level specified in §63.5120(a)(1) or (2) and has only always-controlled work stations, then you must demonstrate compliance with the provisions of paragraph (e) of this section when emissions from the affected source are controlled by one or more solvent recovery devices.
 - (2) If the affected source uses one compliance procedure to limit organic HAP emissions to the level specified in §63.5120(a)(1) or (2) and has only always-controlled work stations, then you must demonstrate compliance with the provisions of paragraph (f) of this section when emissions are controlled by one or more oxidizers.

- (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.
- (4) The method of limiting organic HAP emissions to the level specified in §63.5120(a)(3) is the installation and operation of a PTE around each work station and associated curing oven in the coating line and the ventilation of all organic HAP emissions from each PTE to an oxidizer with an outlet organic HAP concentration of no greater than 20 ppmv on a dry basis. An enclosure that meets the requirements in §63.5160(e)(1) is considered a PTE. Initial compliance of the oxidizer with the outlet organic HAP concentration limit is demonstrated either through continuous emission monitoring according to paragraph (c)(4)(ii) of this section or through performance tests using the procedure in §63.5160(d). If this method is selected, you must meet the requirements of paragraph (c)(4)(i) of this section to demonstrate continuing achievement of 100 percent capture of organic HAP emissions and either paragraph (c)(4)(ii) or paragraph (c)(4)(iii) of this section, respectively, to demonstrate continuous compliance with the oxidizer outlet organic HAP concentration limit through continuous emission monitoring or continuous operating parameter monitoring:
 - (i) Whenever a work station is operated, continuously monitor the capture system operating parameter established in accordance with §63.5150(a)(4).
 - (ii) To demonstrate that the value of the exhaust gas organic HAP concentration at the outlet of the oxidizer is no greater than 20 ppmv, on a dry basis, install, calibrate, operate, and maintain CEMS according to the requirements of §63.5150(a)(2).
 - (iii) To demonstrate continuous compliance with operating limits established in accordance with §63.5150(a)(3), whenever a work station is operated, continuously monitor the applicable oxidizer operating parameter.
- (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.
 - (1) If you use one or more solvent recovery devices, you must demonstrate compliance with the provisions in paragraph (e) of this section.
 - (2) If you use one or more oxidizers, you must demonstrate compliance with the provisions in paragraph (f) of this section.
 - (3) If you use both solvent recovery devices and oxidizers, or operate one or more never-controlled work stations or one or more intermittently controllable work stations, you must demonstrate compliance with the provisions in paragraph (g) 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.
- (x) *Organic HAP emission rate based on solids applied for the 12-month compliance period, L_{ANNUAL} .* If demonstrating compliance with the organic HAP emission rate based on solids applied for the 12-month compliance period, calculate the organic HAP emission rate based on solids applied, L_{ANNUAL} , for the 12-month compliance period using Equation 6 of this section.
- (xi) *Compare actual performance to performance required by compliance option.* The affected source is in compliance with §63.5120(a) if each oxidizer is operated such that the average operating parameter value is greater than the operating parameter value established in §63.5150(a)(3) for each 3-hour period, and each capture system operating parameter average value is greater than or less than (as appropriate) the operating parameter value established in §63.5150(a)(4) for each 3-hour period; and the requirement in either paragraph (f)(1)(xi)(A) or (B) of this section is met.
 - (A) The overall organic HAP control efficiency, R, is 98 percent or greater for each; or
 - (B) The organic HAP emission rate based on solids applied, L_{ANNUAL} , is 0.046

kg organic HAP per liter solids applied or less for the 12-month compliance period.

- (2) *Continuous emission monitoring of control device performance.* Use continuous emission monitors, conduct an initial performance test of capture efficiency, and continuously monitor a site specific operating parameter to ensure that capture efficiency is maintained. Compliance must be demonstrated in accordance with paragraph (e)(2) 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) You must submit an initial notification required in §63.9(b).
 - (1) Submit an initial notification for an existing source no later than 2 years after June 10, 2002.
 - (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).

§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).

Tables to Subpart SSSS of Part 63

If you are required to comply with operating limits by §63.5121, you must comply with the applicable operating limits in the following table:

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 must not fall below the combustion temperature limit established according to §63.5160(d)(3)(i). | i. collecting the combustion temperature data according to §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). |

E.1.3 One Time Deadlines Relating to National Emission Standards for Hazardous Air Pollutants (NESHAP): Surface Coating of Metal Coil

The Permittee shall comply with the following requirements by the dates listed:

| Requirement | Rule Cite | Affected Facility | Deadline |
|--|----------------------|-------------------|--|
| Submit Initial Notification | 40 CFR 63.5180(b)(1) | Line 5 | June 10, 2004 |
| Compliance Date | 40 CFR 63.5130(a) | Line 5 | June 10, 2005 |
| Initial Compliance Period | 40 CFR 63.5130(d) | Line 5 | June 10, 2005 through August 31, 2006 |
| Submit Notification of Performance Test (if using control equipment to comply) | 40 CFR 63.5180(c) | Line 5 | At least 60 days prior to performance test |
| Conduct Performance Test (if using control equipment to comply) | 40 CFR 63.5160 | Line 5 | On or before December 7, 2005 |
| Submit Notification of Compliance Status | 40 CFR 63.5180(d) | Line 5 | September 30, 2006 |
| Submit Performance Test Reports (if using control equipment to comply) | 40 CFR 63.5180(e) | Line 5 | Within 60 days after performance test |
| Submit First Semi-Annual Compliance Report | 40 CFR 63.5180(g)(1) | Line 5 | March 30, 2007 |

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

Source Name: Roll Coater, Inc.
Source Address: 858 E. Hupp Road, LaPorte, Indiana 46350
Mailing Address: 858 E. Hupp Road, LaPorte, Indiana 46350
Part 70 Permit No.: T091-17589-00040

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: 858 E. Hupp Road, LaPorte, Indiana 46350
Mailing Address: 858 E. Hupp Road, LaPorte, Indiana 46350
Part 70 Permit No.: T091-17589-00040

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 Quarterly Report

Source Name: Roll Coater, Inc.
Source Address: 858 E. Hupp Road, LaPorte, Indiana 46350
Mailing Address: 858 E. Hupp Road, LaPorte, Indiana 46350
Part 70 Permit No.: T091-17589-00040
Facility: Metal coil coating Line 5
Parameter: VOC emissions from line 5 including coatings, dilution solvents and cleaning solvents
Limit: Less than 245 tons per twelve (12) consecutive month period with compliance determined at the end of each month

YEAR:

| Month | Column 1 | Column 2 | Column 1 + Column 2 |
|---------|----------------------|------------------------------|--------------------------|
| | This Month (tons) | Previous 11 Months (tons) | 12 Month Total (tons) |
| Month 1 | | | |
| Month 2 | | | |
| Month 3 | | | |

No deviation occurred in this quarter.

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

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

Attach a signed certification to complete this report.

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

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

Source Name: Roll Coater, Inc.
 Source Address: 858 E. Hupp Road, LaPorte, Indiana 46350
 Mailing Address: 858 E. Hupp Road, LaPorte, Indiana 46350
 Part 70 Permit No.: T091-17589-00040

Months: _____ to _____ Year: _____

| | |
|---|-------------------------------|
| <p>This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. 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".</p> | |
| <input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD. | |
| <input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD | |
| Permit Requirement (specify permit condition #) | |
| Date of Deviation: | Duration of Deviation: |
| Number of Deviations: | |
| Probable Cause of Deviation: | |
| Response Steps Taken: | |
| Permit Requirement (specify permit condition #) | |
| Date of Deviation: | Duration of Deviation: |
| Number of Deviations: | |
| Probable Cause of Deviation: | |
| Response Steps Taken: | |

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Quality

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

| | |
|------------------------------|-------------------------------------|
| Source Name: | Roll Coater, Inc. |
| Source Location: | 858 E. Hupp Road, LaPorte, IN 46350 |
| County: | LaPorte |
| SIC Code: | 3479 |
| Operation Permit No.: | T091-17589-00040 |
| Permit Reviewer: | Teresa Freeman |

On November 21, 2007, the Office of Air Quality (OAQ) had a notice published in the LaPorte Herald-Argus, LaPorte, Indiana, stating that Roll Coater, Inc. had applied for a Part 70 Operating Permit to operate a stationary coil coating operation. 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.

Upon further review, the OAQ has decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted). The Table of Contents has been modified to reflect these changes.

On December 20, 2007, Roll Coater, Inc. submitted comments on the proposed Part 70 permit. The summary of the comments is as follows:

Comment 1:

Permit Condition B.22(e) should be deleted in its entirety because it is not one of the inspection and entry requirements specified in 327 IAC 2-7-6 or Indiana Code Sections 13-14-2-2, 13-30-3-1 or 13-17-3-2

Response1:

IDEM, OAQ disagrees. The regulations and/or statutory provisions cited in Condition B.22 do provide the authority for the language used. 326 IAC 2-7-6(6) allows the more specific language allowed in B.22 (e) in order to allow different types of monitoring equipment such as photographs which are routinely taken to document conditions during an inspection, and are therefore included in 326 IAC 2-7-6(2)(C). The use of cameras or other recording, testing, or monitoring equipment for the purpose of assuring compliance with this permit, if necessary, is a reasonable extension of this documentation. This subsection acknowledges the right of the source to claim such information is confidential. There has been no change to the permit as a result of this comment.

Comment 2:

Permit Condition C.13 (a) is an incomplete sentence because it does not include the date Roll Coater submitted its ERP. According to the Technical Support Document associated with the draft Permit, Roll Coater submitted its ERP on December 12, 1996. Therefore, this Condition should be revised to add the date.

Response 2:

IDEM OAQ agrees to change Condition C.13 (a) as follows:

C.13 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**.

Comment 3:

Roll Coater requests the word "Actual" be added at the beginning of this condition immediately prior to the words "VOC emissions from metal coil coating line 5". As the condition currently is worded, it is unclear whether the VOC emission limit applies to potential or actual emissions. Because the potential VOC emissions from metal coil coating line 5 will not change and exceed the 245 ton limitation, Roll Coater believes this condition is intended to apply to actual emissions (emissions after control) from metal coil coating line 5 and not potential emissions (emissions prior to control).

Response 3:

IDEM OAQ agrees to change Condition D.2.1 as follows:

D.2.1 PSD Minor Limit for VOC [326 IAC 2-2]

Actual VOC emissions from metal coil coating line 5 including coatings, dilution solvents and cleaning solvents shall be less than 245 tons per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance with this limit, combined with the potential to emit VOC from other emission units at the source, shall limit the VOC from the entire source to less than 250 tons per twelve (12) consecutive month period and render 326 IAC 2-2 not applicable.

Comment 4:

- (a) Roll Coater requests that the words "fan amperage" located between "When for any one reading, the" and "is outside the normal range" be deleted and replaced with the words "pressure differential". This change is necessary to make Condition D.2.7 (b) consistent with Condition D.2.7 (a) which establishes the pressure differential as the capture system monitoring parameter.
- (b) Roll Coater requests that the word "shall" located between "Records" and "include purchase orders, invoices and material safety data sheets" be deleted and replaced with the word "may". Because various documents may contain information that can be used to verify the type and amount of material used and it is the Permittee's responsibility to ensure it determines which documents are necessary to demonstrate to IDEM that its documentation is sufficient to demonstrate compliance with the applicable requirements, requiring the use of certain documents that may or may not be sufficient to demonstrate compliance is inappropriate.

Response 4:

IDEM, OAQ agrees to change Conditions D.2.7 and D.2.8. The Permittee may use other documentation to verify coating usage, but ultimately must be able to provide proof of actual coating usage. Condition D.2.8 has also been changed to include a recordkeeping requirement for the pressure differential reading. These changes are as follows:

Roll Coater, Inc.
LaPorte, Indiana
Permit Reviewer: Teresa Freeman

Page 3 of 5
T091-17589-00040

D.2.7 Parametric Monitoring [40 CFR 64]

- (a) The Permittee shall determine pressure differential across the enclosure from the most recent valid stack test that demonstrates compliance with limits in condition D.2.1, as approved by IDEM.
- (b) The **pressure** differential across the enclosure shall be observed at least once per day when the thermal oxidizer is in operation. When for any one reading, the ~~fan amperage~~ **pressure differential** 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.2.8 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 usage limits and/or the VOC emission limits established in Condition D.2.1.
 - (1) The VOC content of each coating material and solvent used.
 - (2) The amount of coating material and solvent less water used.
 - (A) Records shall include purchase orders, invoices, ~~and~~ material safety data sheets (MSDS) **or other documentation** necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (3) The cleanup solvent usage for each month;
 - (4) The total VOC usage for each month; and
- (b) **To document compliance with Condition D.2.7, the Permittee shall maintain a daily record of the pressure across the enclosure. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading, (e.g. the process did not operate that day).**
- (bc) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Comment 5:

Roll Coater requests that the reference to 40 CFR 63.4501 be replaced with a reference to 40 CFR 63.5140, the provision in Subpart SSSS.

Response 5:

E.1.1 General Provisions Relating to National Emissions Standards for Hazardous Air Pollutants under 40 CFR Part 63 [326 IAC 20-1][40 CFR Part 63, Subpart A]

Pursuant to 40 CFR 63.4504 ~~5140~~, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1, as specified in Table 2 of 40 CFR Part 63, Subpart SSSS in accordance with schedule in 40 CFR Part 63, Subpart SSSS.

Comment 6:

According to the preamble to 40 CFR 63 Subpart SSSS, “The portions of the metal coil coating line to which the emission limitations apply are the coating application stations and associated curing ovens. Wet section, pretreatment and quench operations are part of the metal coil coating line, but are not subject to the emission limitations.” To clarify, Roll Coater requests that the statement, “The portions of the metal coil coating line to which the emission limitations apply are the coating application stations and associated curing ovens.”

Response 6:

E.1.2 Surface Coating of Metal Coil NESHAP [40 CFR Part 63, Subpart SSSS]

The portions of the metal coil coating line to which the emission limitations apply are the coating application stations and associated curing ovens. The Permittee which engages in surface coating of metal coil shall comply with the provisions of 40 CFR Part 63, Subpart SSSS, as follows:

Comment 7:

Because Roll Coater already has complied with all of the requirements listed by the dates listed and because all of the one time deadlines already have occurred, Roll Coater requests that IDEM include within the permit or TSD acknowledgement that Roll Coater has already complied with the listed requirements.

Response 7:

No change will be made to the original TSD. The OAQ prefers that the TSD 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.

The Part 70 permit includes all applicable requirements, including the deadlines for meeting requirements of 40 CFR Part 63, Subpart SSSS. Since Roll Coater has complied with the applicable deadlines listed within the rule, they have complied with the requirements as stated within the permit. No change will be made as a result of this comment.

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: | 858 E. Hupp Road, LaPorte, IN 46350 |
| County: | LaPorte |
| SIC Code: | 3479 |
| Operation Permit No.: | T091-17589-00040 |
| Permit Reviewer: | Teresa Freeman |

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application for Roll Coater, Inc. relating to the operation of a stationary coil coating operation.

History

On April 15, 2003, Roll Coater, Inc. submitted applications to the OAQ requesting to renew its operating permit. Roll Coater, Inc. was issued a Part 70 Operating Permit (T091-7585-00040) on February 12, 1999.

Permitted Emission Units and Pollution Control Equipment

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

- (a) One (1) metal coil coating line, identified as Line 5, constructed in 1979, with maximum capacity of 200 gallons of coating per hour, using two (2) thermal oxidizers as control, consisting of the following equipment:
 - (1) One (1) #3 steering exhaust, exhausting to one (1) stack 17;
 - (2) One (1) brush unit, used for surface preparation prior to coating, exhausting to one (1) stack 18;
 - (3) One (1) wet section (stages 5-16), exhausting to one (1) stack 19;
 - (4) One (1) preclean (stages 1-4), exhausting to one (1) stack 20;
 - (5) One (1) finish coater room, exhausting to one (1) stack 21;
 - (6) One (1) prime coater room, exhausting to one (1) stack 22;
 - (7) One (1) waste heat fueled finish boiler, heat for this boiler is provided by the finish afterburner with a maximum heat input capacity of 20 million British thermal units per hour (MMBtu/hr), exhausting to one (1) stack 23;
 - (8) One (1) natural gas fired finish oven, with a maximum heat input capacity of 48 million British thermal units per hour (MMBtu/hr), exhausting to one (1) stack 24;
 - (9) One (1) natural gas fired prime oven, with a maximum heat input capacity of 48 million British thermal units per hour (MMBtu/hr), exhausting to one (1) stack 25;

- (10) One (1) waste heat fueled prime boiler, heat for this boiler is provided by the prime afterburner with a maximum heat input capacity of 20 million British thermal units per hour (mmBtu/hr), exhausting to one (1) stack 26; and
- (11) One (1) cooling tunnel, exhausting to one (1) stack 27.

Under 40 CFR 63, Subpart SSSS, the coating application stations and associated curing ovens are considered metal coil surface coating operations.

Emission Units and Pollution Control Equipment Removed From the Source

The following emission units have been permanently removed from service:

- (a) One (1) natural gas fueled east standby boiler, constructed in 1974, identified as Boiler (East), with a maximum heat input capacity of 13.39 million British thermal units per hour (MMBtu/hr), exhausting to one (1) stack 11; [326 IAC 6-2-3]
- (b) One (1) metal coil coating line, identified as Line 4, with maximum capacity of 180 gallons of coating per hour, using two (2) thermal oxidizers as control, consisting of the following equipment:
 - (1) One (1) quench, constructed in 1974, exhausting to one (1) stack 2;
 - (2) One (1) cooling tunnel, constructed in 1974, exhausting to one (1) stack 3;
 - (3) One (1) natural gas fired prime oven, constructed in 1974, exhausting to one (1) stack 4;
 - (4) One (1) waste heat fueled prime boiler, constructed in 1979, exhausting to one (1) stack 4;
 - (5) One (1) natural gas fired finish oven, constructed in 1974, exhausting to one (1) stack 6;
 - (6) One (1) waste heat fueled finish boiler, constructed in 1979, exhausting to one (1) stack 7;
 - (7) One (1) finish coater room, constructed in 1974, exhausting to one (1) stack 8;
 - (8) One (1) prime coater room, constructed in 1974, exhausting to one (1) stack 9;
 - (9) One (1) preclean, constructed in 1974, exhausting to one (1) stack 10;
 - (10) One (1) lower wet section, constructed in 1974, exhausting to one (1) stack 13;
 - (11) One (1) upper wet section, constructed in 1974, exhausting to one (1) stack 14; and
 - (12) One (1) brush unit, constructed in 1974, exhausting to one (1) stack 15.

Insignificant Activities

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

- (a) One (1) natural gas fueled west standby boiler, identified as Boiler (West), constructed in 1974, with a maximum heat input capacity of 13.39 million British thermal units per hour

- (MMBtu/hr), exhausting to one (1) stack 12; [326 IAC 6-2-3]
- (b) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour;
 - (c) Combustion source flame safety purging on startup;
 - (d) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.
 - (e) 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;
 - (f) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids;
 - (g) Filling drums, pails or other packaging containers with lubricating oils, waxes, and greases;
 - (h) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings;
 - (i) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6;
 - (j) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment;
 - (k) Closed loop heating and cooling systems;
 - (l) Any of the following structural steel and bridge fabrication activities:
 - (A) Cutting 200.00 linear feet or less of one inch (1") plate or equivalent; and
 - (B) Using 80 tons or less of welding consumables;
 - (m) Rolling oil recover systems;
 - (n) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume;
 - (o) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs;
 - (p) Quenching operations used with heat treating processes;
 - (q) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment;
 - (r) Heat exchanger cleaning and repair;
 - (s) Paved and unpaved roads and parking lots with public access; [326 IAC 6-4]

- (t) 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;

Existing Approvals

The source has been operating under the previous Title V T091-7585-00040 issued on February 12, 1999 and the following amendments and revisions:

- (a) First Administrative Amendment No. 091-10759-00040, issued on May 05, 1999; and
- (b) First Permit Reopening No. 091-13379-00040, issued on January 25, 2002.
- (c) Review Request No. 091-19816-00040, issued on August 18, 2004.

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 registrations and 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:

- (a) All conditions pertaining to the east standby boiler, identified as Boiler (East), and metal coil coating line, identified as Line 4, from all previously issued permits.

Reason not incorporated: Based upon a January 10, 2007 letter received from the source, requesting that the permit be revised because the source will no longer be operating these emission units at the facility. All conditions pertaining to the east standby boiler and metal coil coating Line 4 have been removed from this Title V renewal.

- (b) All conditions pertaining to the applicability of 326 IAC 8-2-4 has been removed.

Reason not incorporated: This source is located in LaPorte County and was built before January 1, 1980; therefore 326 IAC 8-2-4 is not applicable to this source and has been given a PSD Minor Limit for VOC.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

| Stack ID | Operation | Height (feet) | Diameter (feet) | Flow Rate (acfm) | Temperature (°F) |
|----------|-----------------------------------|---------------|-----------------|------------------|------------------|
| 12 | West stand-by boiler | 49 | 3 | 4,500 | 450 |
| 17 | Line 5: #3 steering | 48 | 3 | 15,000 | 75 |
| 18 | Line 5: brush unit | 49 | 3.25 | 33,000 | 80 |
| 19 | Line 5: wet section (stages 5-16) | 48 | 3.25 | 55,935 | 100 |
| 20 | Line 5: preclean (stages 1-4) | 63 | 3.6 | 20,215 | 100 |

| Stack ID | Operation | Height (feet) | Diameter (feet) | Flow Rate (acfm) | Temperature (°F) |
|----------|--------------------------------------|---------------|-----------------|------------------|------------------|
| 21 | Line 5: finish coater room | 66 | 3.25 | 20,000 | 70 |
| 22 | Line 5: prime coater room | 66 | 3.25 | 20,000 | 70 |
| 23 | Line 5: waste heat fuel boiler | 30 | 3.5 | 28,000 | 450 |
| 24 | Line 5: finish oven | 30 | 3.5 | 48,000 | 1200 |
| 25 | Line 5: prime oven | 30 | 3.5 | 48,000 | 1200 |
| 26 | Line 5: waste heat fuel prime boiler | 30 | 3.5 | 28,000 | 450 |
| 27 | Line 5: cooling tunnel | 60 | 6 | 108,000 | 70 |

Emission Calculations

See Appendix A of this document for detailed emission calculations.

County Attainment Status

The source is located in LaPorte County.

| Pollutant | Status |
|-------------------|------------|
| PM _{2.5} | Attainment |
| PM ₁₀ | Attainment |
| SO ₂ | Attainment |
| NO _x | Attainment |
| 8-hr Ozone | Attainment |
| CO | Attainment |
| Lead | Attainment |

- (a) LaPorte County has been classified as attainment for PM_{2.5}. 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 PM_{2.5} emissions, it has directed states to regulate PM₁₀ emissions as a surrogate for PM_{2.5} emissions. See the State Rule Applicability – Entire Source section.
- (b) Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) 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 emissions and NO_x emissions are considered when evaluating the rule applicability relating to ozone standards. LaPorte County became attainment on September 6, 2007. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.
- (c) LaPorte County has been classified as attainment or unclassifiable in Indiana for all other criteria air pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.
- (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.

- (e) **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 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD or Emission Offset applicability.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

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

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

| HAP's | Potential Emissions (tons/year) |
|--------------------|---------------------------------|
| Cumene | less than 10 |
| Dimethyl Phthalate | less than 10 |
| Ethylbenzene | less than 10 |
| Formaldehyde | less than 10 |
| Glycol Ethers | greater than 10 |
| Hydrogen Fluoride | greater than 10 |
| Isophrone | greater than 10 |
| MIBK | less than 10 |
| Naphthalene | greater than 10 |
| Propylene Oxide | less than 10 |
| Styrene | less than 10 |
| Toluene | less than 10 |
| Xylene | greater than 10 |
| TOTAL | greater than 25 |

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of VOC is equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all other criteria pollutants are less than 100 tons per year.
- (c) 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. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (d) **Fugitive Emissions**
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-7, fugitive emissions are not counted toward the determination of Part 70 applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2005 OAQ emission data.

| Pollutant | Actual Emissions (tons/year) |
|------------------|------------------------------|
| PM | 13.44* |
| PM ₁₀ | 7.28** |
| SO ₂ | 0.11 |
| VOC | 147.7*** |
| CO | 3.84 |
| NO _x | 19.02 |
| HAP | Not Reported |

*12.88 tons/yr of PM are from fugitive vehicle traffic emissions

**7.27 tons/yr PM₁₀ are from fugitive vehicle traffic emissions

***VOC emissions include metal coil coating line 4 that has been removed

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 assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of this Part 70 permit renewal, and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

| Process/Emission Unit | Potential to Emit (tons/year) | | | | | | |
|--------------------------|-------------------------------|-------------|-----------------|----------------|-------------|-----------------|---|
| | PM | PM10 | SO ₂ | VOC | CO | NO _x | HAPs |
| Stand-by boiler | 0.11 | 0.45 | 0.04 | 0.32 | 4.93 | 5.86 | 0.011 |
| Coil Coating Line 5 | - | - | - | 245 | - | - | >10 single >25 total |
| Line 5 combustion | 1.07 | 4.53 | 0.36 | 3.28 | 50 | 59.6 | 1.12 |
| Insignificant Activities | 0.08 | 0.33 | 0.03 | 0.24 | 3.68 | 4.38 | 0.008 |
| Total | 1.26 | 5.31 | 0.43 | <250 | 58.6 | 69.8 | >10 single >25 total |

- (a) This existing stationary source is not major for PSD because the emissions of each criteria pollutant are less than two hundred fifty (<250) tons per year, and it is not one of the twenty-eight (28) listed source categories.
- (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.

Federal Rule Applicability

- (a) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to pollutant-specific emission units at a major source that is required to obtain a Part 70 or 71 permit and that meet the following criteria:
 - (1) have a potential to emit before controls equal to or greater than the major source threshold for the pollutant involved;
 - (2) are subject to an emission limitation or standard for that pollutant; and
 - (3) use a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.

The following table is used to identify the applicability of each of the criteria, under 40 CFR 64.1, to each pollutant-specific emission unit involved:

| Emission Unit | Control Device Used | Emission Limitation (Y/N) | Uncontrolled PTE (tons/year) | Controlled PTE (tons/year) | Major Source Threshold (tons/year) | CAM Applicable (Y/N) | Large Unit (Y/N) |
|---------------|---------------------|---------------------------|---|----------------------------|---|----------------------|------------------|
| Line 5 - VOC | Y | Y | 851 | 83.7 | 100 | Y | N |
| Line 5 - HAPs | Y | Y | >10 tpy single HAP and >25 tpy total HAPs | 62.3 | 10 tpy single HAP and 25 tpy total HAPs | N | N |

Line 5, constructed in 1979, is subject to 40 CFR 64, Compliance Assurance Monitoring (CAM) as follows:

- (A) A continuous monitoring system shall be calibrated, maintained, and operated on the regenerative thermal oxidizer for measuring operating temperature. Continuous means measuring temperature at an interval of once per 15 minutes. The output of this system shall be recorded as a three (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 – Response to Excursions or Exceedances whenever the three (3) hour average temperature of the regenerative thermal oxidizer is below 1225°F (from 2005 stack test). A three (3) hour average temperature that is below 1225°F (from 2005 stack test) is not a deviation from this permit. Failure to take response steps in accordance with Section C – Response to Excursions or 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.

- (C) On and after the date the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C – Response to Excursions or Exceedances whenever the three (3) hour average temperature of the regenerative thermal oxidizer is below the three (3) hour average temperature as observed during the compliant stack test. A three (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 – Response to Excursions or Exceedances shall be considered a deviation from this permit.
- (b) The requirements of the New Source Performance Standard for Electric Utility Steam Generating Units for Which Construction is Commenced After September 18, 1978, 326 IAC 12, (40 CFR 60.40, Subpart D), are not included in the permit for the two (2) waste heat fueled boilers on Line 5, constructed in 1979 because they do not combust any type of fuel.
- (c) The requirements of the New Source Performance Standard for Industrial-Commercial-Institutional Steam Generating Units, 326 IAC 12, (40 CFR 60.40c, Subpart Dc), are not included in the permit for one (1) standby boiler, with a maximum heat input capacity rated at 13.39 million British thermal units per hour (mmBtu/hr), constructed in 1974, which is prior to the June 9, 1989 applicability date,
- (d) The requirements of the New Source Performance Standard for Metal Coil Surface Coating, 326 IAC 12, (40 CFR 60.460, Subpart TT), are not included in the permit for the one (1) metal coil coating line, identified as Line 5, constructed in 1979, because it was constructed prior to the January 5, 1981 applicability date.
- (e) The requirements of the National Emission Standards for Hazardous Air Pollutants (40 CFR 63.460, Subpart T), are not included in the permit because the degreasing operations (Insignificant Activity) are not subject to the requirements because they do not use any of the solvents listed in this Subpart.
- (f) This source is subject to the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Metal Coil 40 CFR 63.5080, Subpart SSSS, which is incorporated by reference as 326 IAC 20-64 because the source is a major source of HAPs and performs surface coating of metal coil. Wet section and preclean operations are part of the metal coil coating line, but are not subject to the emission limitations. The coil coating line does not include ancillary operations such as storage of coating and cleaning material, wastewater treatment, coating material mixing/thinning, and parts and equipment cleaning and, therefore, the standards do not apply to these operations. The specific facilities subject to 40 CFR 63, Subpart SSSS include the following:
 - (1) One (1) metal coil coating line, constructed in 1979, identified as Line 5, with maximum capacity of 200 gallons of coating per hour, using two (2) thermal oxidizers as control, consisting of the following equipment:
 - (A) One (1) finish coater room, exhausting to one (1) stack (21);
 - (B) One (1) prime coater room, exhausting to one (1) stack (22);
 - (C) One (1) waste heat fueled finish boiler, heat for this boiler is provided by the finish afterburner with a maximum heat input capacity of 20 million British thermal units per hour (MMBtu/hr), exhausting to one (1) stack (23);

- (D) One (1) natural gas fired finish oven, with a maximum heat input capacity of 48 million British thermal units per hour (MMBtu/hr), exhausting to one (1) stack (24);
- (E) One (1) natural gas fired prime oven, with a maximum heat input capacity of 48 million British thermal units per hour (mmBtu/hr), exhausting to one (1) stack (25);
- (F) One (1) waste heat fueled prime boiler, heat for this boiler is provided by the prime afterburner with a maximum heat input capacity of 20 million British thermal units per hour (mmBtu/hr), exhausting to one (1) stack (26); and
- (G) One (1) cooling tunnel, exhausting to one (1) stack (27).

Pursuant to 40 CFR 63.5130, the Permittee shall comply with the requirements of 40 CFR 63, Subpart SSSS by June 10, 2005. The Permittee has submitted all required notifications.

Pursuant to 40 CFR 63.5170, the Permittee has chosen to comply with the requirements of 40 CFR 63, Subpart SSSS by:

- (1) Use of "as purchased" compliant coatings; or
- (2) Use of "as applied" compliant coatings; or
- (3) Use of a capture system and control device; or
- (4) Use of a combination of compliant coatings and control devices and maintaining an acceptable equivalent emission rate.

The coating line is equipped with two (2) thermal oxidizers. During the weeks of November 28, 2005 and December 5, 2005 the facility conducted performance testing on the thermal oxidizers. The performance testing on Line 5 indicates an overall control efficiency of 95.0%. The Permittee at this time will use compliance option #4, above, to demonstrate compliance for Line 5.

Nonapplicable portions of the NESHAP will not be included in the permit. The existing affected source associated with the surface coating of metal coil is subject to the following portions of 40 CFR Part 63, Subpart SSSS:

40 CFR Part 63.5080
40 CFR Part 63.5090(a) and (d)
40 CFR Part 63.5100
40 CFR Part 63.5110
40 CFR Part 63.5120
40 CFR Part 63.5130(a), (d) and (e)
40 CFR Part 63.5140
40 CFR Part 63.5150(a)(3), (4) and (b)
40 CFR Part 63.5160
40 CFR Part 63.5170 (a), (b), (c), (d), (f) and (i)
40 CFR Part 63.5180 (a) through (h)
40 CFR Part 63.5190(a)
Table 1 (1) of 40 CFR Part 63, Subpart SSSS

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.

State Rule Applicability - Entire Source

326 IAC 1-5-2 (Emergency Reduction Plans)

The source has submitted an Emergency Reduction Plan (ERP) on December 12, 1996 with its Part 70 Permit application. The ERP has been verified to fulfill the requirements of 326 IAC 1-5-2 (Emergency Reduction Plans).

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting) because it is required to have an operating permit under 326 IAC 2-7, Part 70 program and because it is located in LaPorte County. Pursuant to this rule, the Permittee shall submit an emission statement certified pursuant to the requirements of 326 IAC 2-6. 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.

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 this permit:

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

State Rule Applicability – Individual Facilities

326 IAC 2-2 (Minor Source Limit)

VOC emissions from metal coil coating line 5 including coatings, dilution solvents and cleaning solvents shall be less than 245 tons per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance with this limit, combined with the potential to emit VOC from other emission units at the source, shall limit the VOC from the entire source to less than 250 tons per twelve (12) consecutive month period and render 326 IAC 2-2 not applicable.

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

- (a) The metal coil coating line, identified as Line 5, is 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.
- (b) Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions 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. The process weight rate of the structural steel and bridge fabrication is less than 100 pounds per hour each.
- (c) The insignificant brazing, cutting, soldering, and welding equipment are exempt from the requirements of 326 IAC 6-3 pursuant to 326 IAC 6-3-1(b). The welding operation consumes less than 625 pounds rod per day and wire consumed and torch cutting less than 3,400 inches per hour of stock 1" thick or less is cut.

326 IAC 6-2-3 (Emission Limitations for Facilities Specified in 326 IAC 6-2-1(c))

Pursuant to 326 IAC 6-2-3 (Emission Limitations for Facilities Specified in 326 IAC 6-2-1(c)), the particulate matter (PM) emissions from the one (1) standby boiler (west), and one (1) standby boiler (east) constructed in 1974, with a maximum heat capacity of 13.39 million British thermal units per hour each (26.78 mmBtu/hr total) and using natural gas as fuel shall be limited to 0.6 pounds per million British thermal unit. [Note: the standby boiler (east) has been removed, but the total source maximum capacity rating includes both standby boilers from the original operating permit.] This limit is calculated by the following equation:

$$Pt = \frac{C \times a \times h}{76.5 \times Q^{0.75} \times N^{0.25}}$$

where:

Pt = Pounds of particulate matter emitted per million British thermal units (lb/MMBtu) heat input

Q = Total source maximum operating capacity rating in million British thermal units per hour (MMBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.

C = Maximum ground level concentration with respect to distance from the point source at the "critical" wind speed for level terrain. This shall equal 50 micrograms per cubic meter for a period not to exceed a sixty (60) minute time period.

N = Number of stacks in fuel burning operation.

a = Plume rise factor which is used to make allowance for less than theoretical plume rise. The value 0.67 shall be used for Q less than or equal to 1,000 MMBtu/hr heat input. The value 0.8 shall be used for Q greater than 1,000 MMBtu/hr heat input.

h = Stack height in feet. If a number of stacks of different heights exist, the average stack height to represent "N" stacks shall be calculated by weighing each stack height with its particulate matter emission rate as follows:

$$h = \frac{\sum_{i=1}^N H_i \times pa_i \times Q}{\sum_{i=1}^N pa_i \times Q}$$

where:

pa = the actual controlled emission rate in lb/mmBtu using the emission factor from AP-42 or stack test data. Stacks constructed after January 1, 1971, shall be credited with GEP stack height only. GEP stack height shall be calculated as specified in 326 IAC 1-7.

For the two (2) standby boilers:

$$Pt = 50 \times 0.67 \times 49 / 76.5 \times (13.39 + 13.39)^{0.75} \times 2^{0.25} = 1.53 \text{ lb/MMBtu}$$

Therefore, $Pt = 1.53 > 0.6$, the one (1) boiler is limited to 0.6 lb/mmBtu.

The boiler is in compliance when using natural gas by the following equation:

$$7.6 \text{ lb/MMCF, to convert this to lb/mmBtu} = 7.6 \text{ lb/MMCF} \times \text{MMCF}/1,000 \text{ mmBtu} = 0.0076 \text{ lb/mmBtu}$$

$0.0076 \text{ lb/mmBtu} < 0.6 \text{ lb/mmBtu}$, therefore the standby boiler (west) is in compliance with this requirement.

326 IAC 7-1.1-1 (Sulfur Dioxide Emission Limitations)

The boiler has a potential to emit SO₂ 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 8-2-4 (Coil Coating Operations)

The prime coater room and finish coater room on Line 5 is not subject to the requirements of 326 IAC 8-2-4 (Coil Coating Operations) because it was constructed before January 1, 1980 and is not located in Clark, Elkhart, Floyd, Lake, Marion, Porter or St. Joseph Counties.

326 IAC 8-3 (Organic Solvent Degreasing Operations)

The degreasing operations (Insignificant Activity) are not subject to the requirements of 326 IAC 8-3 (Organic Solvent Degreasing Operations) because they were installed in 1974 which is prior to the January 1, 1980 applicability date for LaPorte County.

Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a 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 Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

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

- (a) The metal coil coating line 5 has applicable compliance determination conditions as specified in the following table:

| Emission Unit | Control Device | Timeframe for Testing | Pollutant | Frequency of Testing | Limit or Requirement |
|----------------------------------|---------------------------|-------------------------------|------------------|-----------------------------|--|
| Metal coil coating line 5 | two (2) thermal oxidizers | on or before November 8, 2010 | VOC | every five (5) years | total input of VOC to line 5 less than 245 tpy with compliance determined at the end of each month |

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

| Emission Units | Frequency | Parameters |
|-----------------------|------------------|-------------------|
| Thermal oxidizer | Continuous | Temperature |
| Pressure Differential | Daily | inches of water |

Recommendation

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

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

An administratively complete Part 70 permit renewal application for the purposes of this review was received on April 15, 2003. Additional information was received on March 24, 2006.

Conclusion

The operation of this coil coating operation shall be subject to the conditions of the attached Part 70 Operating Permit Renewal No. T091-17589-00040.

Appendix A: Emissions Calculations Summary

Company Name: Roll Coater, Inc.
Address: 858 E. Hupp Road, LaPorte, Indiana 46350
Title V Permit Number: T091-17589-00040
Reviewer: Teresa Freeman
Date: August 7, 2007

| Uncontrolled Emissions | Stand-by Boiler | Coil Coating Line 5 | Line 5 Combustion | Insignificant Activities | Totals |
|--------------------------|-----------------|---------------------|-------------------|--------------------------|----------------|
| PM | 0.11 | - | 1.07 | 0.08 | 1.26 |
| PM10 | 0.45 | - | 4.53 | 0.33 | 5.31 |
| SO2 | 0.04 | - | 0.36 | 0.03 | 0.43 |
| NOx | 5.86 | - | 59.6 | 4.38 | 69.84 |
| VOC | 0.32 | 851 | 3.28 | 0.24 | 854.84 |
| CO | 4.93 | - | 50 | 3.68 | 58.61 |
| HAPs | | | | | |
| HAPs from combustion | 0.011 | - | 1.12 | 0.008 | 1.139 |
| Cobalt Compounds | | 7.69 | | | 7.69 |
| Cumene | - | 5.66 | - | | 5.66 |
| Dimethyl Phthalate | - | 2.5 | - | | 2.5 |
| Ethylbenzene | - | 5.05 | - | | 5.05 |
| Ethylene Glycol | - | 23.07 | - | | 23.07 |
| Formaldehyde | - | 0.93 | - | | 0.93 |
| Glycol Ethers | - | 340.9 | - | | 340.9 |
| Hydrogen Flouride | - | 32.1 | - | | 32.1 |
| Isophrone | - | 57.2 | - | | 57.2 |
| MIBK | - | 9.5 | - | | 9.5 |
| Naphthalene | - | 59.4 | - | | 59.4 |
| Propylene Oxide | - | 0.01 | - | | 0.01 |
| Styrene | - | 0.01 | - | | 0.01 |
| Toluene | - | 8.51 | - | | 8.51 |
| Xylenes | - | 69.6 | - | | 69.6 |
| Total HAPs | | | | | 623.269 |
| Limited Emissions | | | | | |
| Limited Emissions | Back up Boiler | Coil Coating Line 5 | Line 5 Combustion | Insignificant Activities | Totals |
| PM | 0.11 | - | 1.07 | 0.08 | 1.26 |
| PM10 | 0.45 | - | 4.53 | 0.33 | 5.31 |
| SO2 | 0.04 | - | 0.36 | 0.03 | 0.43 |
| NOx | 5.86 | - | 59.6 | 4.38 | 69.84 |
| VOC | 0.32 | 245 | 3.28 | 0.24 | <250 |
| CO | 4.93 | - | 50 | 3.68 | 58.61 |
| HAPs | | | | | |
| HAPs from combustion | 0.11 | | 1.12 | 0.008 | 1.238 |
| Cobalt Compounds | | 0.757 | | | 0.757 |
| Cumene | | 0.557 | | | 0.557 |
| Dimethyl Phthalate | | 0.246 | | | 0.246 |
| Ethylbenzene | | 0.497 | | | 0.497 |
| Ethylene Glycol | | 2.27 | | | 2.27 |
| Formaldehyde | | 0.092 | | | 0.092 |
| Glycol Ethers | | 33.5 | | | 33.5 |
| Hydrogen Flouride | | 3.16 | | | 3.16 |
| Isophrone | | 5.63 | | | 5.63 |
| MIBK | | 0.94 | | | 0.94 |
| Naphthalene | | 5.85 | | | 5.85 |
| Propylene Oxide | | 0.001 | | | 0.001 |
| Styrene | | 0.001 | | | 0.001 |
| Toluene | | 0.838 | | | 0.838 |
| Xylenes | | 6.85 | | | 6.85 |
| | | | | | 62.427 |

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
One (1) 13.39 MMBtu/hr Stand-by Boiler**

Company Name: Roll Coater, Inc.
Address: 858 E. Hupp Road, LaPorte, Indiana 46350
Title V Permit Number: T091-17589-00040
Reviewer: Teresa Freeman
Date: July 24, 2007

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

13.39

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| Emission Factor in lb/MMCF | Pollutant | | | | | |
|------------------------------|-----------|-------|-----------------|-----------------|------|------|
| | PM* | PM10* | SO ₂ | NO _x | VOC | CO |
| Potential to Emit in tons/yr | 1.9 | 7.6 | 0.6 | 100 | 5.5 | 84 |
| | 0.11 | 0.45 | 0.04 | 5.86 | 0.32 | 4.93 |

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

**Emission factor for NOx: Uncontrolled = 100 lb/MMSCF.

Emission factors are from AP-42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (July, 1998).

METHODOLOGY

Potential Throughput (MMSCF/year) = Heat Input Capacity (MMBtu/hour) * 8760 hours/year * 1 MMSCF/1020 MMBtu

Potential To Emit (tons/year) = Potential Throughput (MMSCF/year) * Emission Factor (lb/MMSCF) * 1 ton/2000 lbs

See page 3 for HAPs emissions calculations.

**Appendix A: Emissions Calculations
 Natural Gas Combustion Only
 One (1) 13.39 MMBtu/hr Stand-by Boiler
 HAPs Emissions**

Company Name: Roll Coater, Inc.
Address: 858 E. Hupp Road, LaPorte, Indiana 46350
Title V Permit Number: T091-17589-00040
Reviewer: Teresa Freeman
Date: July 24, 2007

| | HAPs - Organics | | | | |
|------------------------------|--------------------|----------------------------|-------------------------|-------------------|--------------------|
| Emission Factor in lb/MMcf | Benzene 2.1E-03 | Dichlorobenzene 1.2E-03 | Formaldehyde 7.5E-02 | Hexane 1.8E+00 | Toluene 3.4E-03 |
| Potential to Emit in tons/yr | 1.23E-04 | 7.04E-05 | 4.40E-03 | 1.06E-01 | 1.99E-04 |

| | HAPs - Metals | | | | |
|------------------------------|-----------------|--------------------|---------------------|----------------------|-------------------|
| Emission Factor in lb/MMcf | Lead 5.0E-04 | Cadmium 1.1E-03 | Chromium 1.4E-03 | Manganese 3.8E-04 | Nickel 2.1E-03 |
| Potential to Emit in tons/yr | 2.93E-05 | 6.45E-05 | 8.21E-05 | 2.23E-05 | 1.23E-04 |

Methodology is the same as page 2.

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

**Appendix A: Emissions Calculations
Metal and Vinyl Coil Coating Lines
VOC Emissions**

**Company Name: Roll Coater, Inc.
Address: 858 E. Hupp Road, LaPorte, Indiana 4
Title V Permit Number: T091-17589-00040
Reviewer: Teresa Freeman
Date: August 2, 2007**

Emission Units: Line 5

1. The factors given in AP-42, Section 4.2.2.10, *Metal Coil Surface Coating*, represent the emissions from the coating lines.
2. All the VOCs 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% |
| % 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: | 95% |
| % emitted through the ovens/afterburner stacks: | 1.84% |

Maximum Potential to Emit Calculations:

Maximum Potential to Emit VOC = Actual VOC (tpy) x Max hours of operation 8760 hr/ Actual hours of operation 6000 hr
Actual 2005 VOC usage:

| | Actual 2005 VOC usage: | Maximum VOC usage: | from ovens/after- burners (1.84%): | Emitted from coaters (8%): | Emissions after controls: |
|---|---------------------------|-----------------------|---|----------------------------------|---------------------------------|
| Line 5 (tpy) | | | | | |
| Cumene | 3.88 | 5.66 | 0.104 | 0.453 | 0.557 |
| Dimethyl Phthalate | 1.71 | 2.50 | 0.046 | 0.200 | 0.246 |
| Ethylbenzene | 3.46 | 5.05 | 0.093 | 0.404 | 0.497 |
| Ethylene Glycol | 15.80 | 23.07 | 0.424 | 1.845 | 2.270 |
| Formaldehyde | 0.64 | 0.93 | 0.017 | 0.075 | 0.092 |
| Glycol Ethers | 233.5 | 340.88 | 6.272 | 27.27 | 33.543 |
| Hydrogen Flouride | 22.0 | 32.11 | 0.591 | 2.57 | 3.159 |
| Isophrone | 39.2 | 57.23 | 1.053 | 4.58 | 5.632 |
| MIBK | 6.51 | 9.50 | 0.175 | 0.760 | 0.935 |
| Methyl Ethyl Ketone | 162 | 236.52 | 4.352 | 18.922 | 23.274 |
| Naphthalene | 40.7 | 59.42 | 1.093 | 4.754 | 5.847 |
| Propylene Oxide | 0.008 | 0.01 | 0.000 | 0.001 | 0.001 |
| Styrene | 0.01 | 0.01 | 0.000 | 0.001 | 0.001 |
| Toluene | 5.83 | 8.51 | 0.157 | 0.681 | 0.838 |
| Xylenes | 47.7 | 69.64 | 1.281 | 5.571 | 6.853 |
| Total: | 582.9 | 851.1 | 15.66 | 68.08 | 83.744 |
| Maximum PTE from Line 5: | 582.9 | 851.1 | 15.66 | 68.1 | 83.7 |

**Appendix A: Emissions Calculations
Metal and Vinyl Coil Coating Lines
HAP Emissions**

**Company Name: Roll Coater, Inc.
Address: 858 E. Hupp Road, LaPorte, Indiana 46350
Title V Permit Number: T091-17589-00040
Reviewer: Teresa Freeman
Date: August 2, 2007**

Emission Units: Line 5

1. The factors given in AP-42, Section 4.2.2.10, *Metal Coil Surface Coating*, represent the emissions from the coating lines.
2. 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% |
| % 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: | 95% |
| % 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 6000 hr
Actual 2005 HAP usage:

| | Actual 2005 HAP usage: | Maximum HAP usage: | Emitted from ovens/after- burners (1.84%): | Emitted from coaters (8%): | Emissions after controls: |
|---|---------------------------|-----------------------|--|-------------------------------|------------------------------|
| Line 5 (tpy) | | | | | |
| Cobalt compounds | 5.27 | 7.69 | 0.142 | 0.616 | 0.757 |
| Cumene | 3.88 | 5.66 | 0.104 | 0.453 | 0.557 |
| Dimethyl Phthalate | 1.71 | 2.50 | 0.046 | 0.200 | 0.246 |
| Ethylbenzene | 3.46 | 5.05 | 0.093 | 0.404 | 0.497 |
| Ethylene Glycol | 15.80 | 23.07 | 0.424 | 1.845 | 2.270 |
| Formaldehyde | 0.64 | 0.93 | 0.017 | 0.075 | 0.092 |
| Glycol Ethers | 233.5 | 340.88 | 6.272 | 27.27 | 33.543 |
| Hydrogen Flouride | 22.0 | 32.11 | 0.591 | 2.57 | 3.159 |
| Isophrone | 39.2 | 57.23 | 1.053 | 4.58 | 5.632 |
| MIBK | 6.51 | 9.50 | 0.175 | 0.760 | 0.935 |
| Naphthalene | 40.7 | 59.42 | 1.093 | 4.754 | 5.847 |
| Propylene Oxide | 0.008 | 0.01 | 0.000 | 0.001 | 0.001 |
| Styrene | 0.01 | 0.01 | 0.000 | 0.001 | 0.001 |
| Toluene | 5.83 | 8.51 | 0.157 | 0.681 | 0.838 |
| Xylenes | 47.7 | 69.64 | 1.281 | 5.571 | 6.853 |
| Total: | 420.9 | 614.5 | 11.31 | 49.16 | 60.471 |
| Maximum PTE from Line 5: | 420.9 | 614.5 | 11.31 | 49.2 | 60.5 |

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
From Line 5**

Company Name: Roll Coater, Inc.
Address: 858 E. Hupp Road, LaPorte, Indiana 46350
Title V Permit Number: T091-17589-00040
Reviewer: Teresa Freeman
Date: August 2, 2007

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

136.0

1191

| Emission Factor in lb/MMCF | Pollutant | | | | | |
|------------------------------|-----------|-------|------|-------|------|------|
| | PM* | PM10* | SO2 | NOx | VOC | CO |
| Potential to Emit in tons/yr | 1.8 | 7.6 | 0.6 | 100.0 | 5.5 | 84.0 |
| | 1.07 | 4.53 | 0.36 | 59.6 | 3.28 | 50.0 |

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

**Emission factor for NOx: Uncontrolled = 100 lb/MMSCF.

Emission factors are from AP-42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (July, 1998).

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 7/98)

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 5**

Company Name: Roll Coater, Inc.
Address: 858 E. Hupp Road, LaPorte, Indiana 46350
Title V Permit Number: T091-17589-00040
Reviewer: Teresa Freeman
Date: August 2, 2007

| | HAPs - Organics | | | | |
|------------------------------|--------------------|----------------------------|-------------------------|-------------------|--------------------|
| Emission Factor in lb/MMcf | Benzene 2.1E-03 | Dichlorobenzene 1.2E-03 | Formaldehyde 7.5E-02 | Hexane 1.8E+00 | Toluene 3.4E-03 |
| Potential to Emit in tons/yr | 1.25E-03 | 7.15E-04 | 4.47E-02 | 1.07E+00 | 2.03E-03 |

| | HAPs - Metals | | | | |
|------------------------------|-----------------|--------------------|---------------------|----------------------|-------------------|
| Emission Factor in lb/MMcf | Lead 5.0E-04 | Cadmium 1.1E-03 | Chromium 1.4E-03 | Manganese 3.8E-04 | Nickel 2.1E-03 |
| Potential to Emit in tons/yr | 2.98E-04 | 6.55E-04 | 8.34E-04 | 2.26E-04 | 1.25E-03 |

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
Insignificant Combustion Sources**

**Company Name: Roll Coater, Inc.
Address: 858 E. Hupp Road, LaPorte, Indiana 46350
Title V Permit Number: T091-17589-00040
Reviewer: Teresa Freeman
Date: July 24, 2007**

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

10.00

88

| Emission Factor in lb/MMCF | Pollutant | | | | | |
|------------------------------|-----------|-------|-----------------|-----------------|------|------|
| | PM* | PM10* | SO ₂ | NO _x | VOC | CO |
| Potential to Emit in tons/yr | 1.9 | 7.6 | 0.6 | 100 | 5.5 | 84 |
| | 0.08 | 0.33 | 0.03 | 4.38 | 0.24 | 3.68 |

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

**Emission factor for NOx: Uncontrolled = 100 lb/MMSCF.

Emission factors are from AP-42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (July, 1998).

METHODOLOGY

Potential Throughput (MMSCF/year) = Heat Input Capacity (MMBtu/hour) * 8760 hours/year * 1 MMSCF/1020 MMBtu

Potential To Emit (tons/year) = Potential Throughput (MMSCF/year) * Emission Factor (lb/MMSCF) * 1 ton/2000 lbs

See page 3 for HAPs emissions calculations.

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
Insignificant Combustion Sources
HAPs Emissions**

Company Name: Roll Coater, Inc.
Address: 858 E. Hupp Road, LaPorte, Indiana 46350
Title V Permit Number: T091-17589-00040
Reviewer: Teresa Freeman
Date: July 24, 2007

| | HAPs - Organics | | | | |
|------------------------------|--------------------|----------------------------|-------------------------|-------------------|--------------------|
| Emission Factor in lb/MMcf | Benzene 2.1E-03 | Dichlorobenzene 1.2E-03 | Formaldehyde 7.5E-02 | Hexane 1.8E+00 | Toluene 3.4E-03 |
| Potential to Emit in tons/yr | 9.20E-05 | 5.26E-05 | 3.29E-03 | 7.88E-02 | 1.49E-04 |

| | HAPs - Metals | | | | |
|------------------------------|-----------------|--------------------|---------------------|----------------------|-------------------|
| Emission Factor in lb/MMcf | Lead 5.0E-04 | Cadmium 1.1E-03 | Chromium 1.4E-03 | Manganese 3.8E-04 | Nickel 2.1E-03 |
| Potential to Emit in tons/yr | 2.19E-05 | 4.82E-05 | 6.13E-05 | 1.66E-05 | 9.20E-05 |

Methodology is the same as page 2.

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