



Mitchell E. Daniels, Jr.  
Governor

Thomas W. Easterly  
Commissioner

100 North Senate Avenue  
Indianapolis, Indiana 46204  
(317) 232-8603  
(800) 451-6027  
www.IN.gov/idem

TO: Interested Parties / Applicant  
DATE: January 14, 2005  
RE: Silgan Closures / T177-17668-00001  
FROM: Paul Dubenetzky  
Chief, Permits Branch  
Office of Air Quality

### Notice of Decision: Approval – Effective Immediately

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

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-6-1(b) or IC 13-15-6-1(a) require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204.

For an **initial Title V Operating Permit**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **thirty (30)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(b).

For a **Title V Operating Permit renewal**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **fifteen (15)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(a).

The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of an initial Title V operating permit, permit renewal, or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impracticable to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency  
401 M Street  
Washington, D.C. 20406

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



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## PART 70 OPERATING PERMIT RENEWAL OFFICE OF AIR QUALITY

**Silgan Closures, LLC  
1701 Williamsburg Pike  
Richmond, Indiana 47375**

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

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

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

Operation Permit No.: T177-17668-00001	
Issued by: Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: January 14, 2005  Expiration Date: January 14, 2010

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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)]

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The Permittee owns and operates a stationary fabrication of metals products plant.

Responsible Official:	Plant Manager
Source Address:	1701 Williamsburg Pike, Richmond, IN 47375
Mailing Address:	1701 Williamsburg Pike, Richmond, IN 47375
General Source Phone Number:	765-983-9278
SIC Code:	3466, 3469, and 3559
County Location:	Wayne
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD Rules; Major Source, Section 112 of the Clean Air Act 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)]

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

- (a) One (1) coating line, identified as Coat-1, constructed in 1967, with a maximum capacity of 9000 aluminum metal sheets per hour and using reverse roll coating applicators, consisting of a lacquer coating machine and a natural gas-fired curing oven, exhausting to a catalytic oxidizer with a heat input of 12.3 mmBtu/hr, and exhausting to stack S5.
- (b) One (1) coating line, identified as Coat-2, constructed in 1967, with a maximum capacity of 9000 aluminum metal sheets per hour and using reverse roll coating applicators, consisting of a lacquer coating machine, an offset lithographic press and a natural gas-fired curing oven, exhausting to a catalytic oxidizer with a heat input of 12.3 mmBtu/hr, and exhausting to stack S8.
- (c) One (1) coating line, identified as Coat-3, constructed in 1967, with a maximum capacity of 6000 aluminum metal sheets per hour and using reverse roll coating applicators, consisting of a lacquer coating machine and a natural gas-fired curing oven, exhausting to a catalytic oxidizer with a heat input of 9.0 mmBtu/hr, and exhausting to stack S10.
- (d) One (1) coating line, identified as Coat-4, constructed in 1967, with a maximum capacity of 6000 aluminum metal sheets per hour and using reverse roll coating applicators, consisting of a lacquer coating machine and a natural gas-fired curing oven, exhausting to a catalytic oxidizer with a heat input of 9.0 mmBtu/hr, and exhausting to stack S12.
- (a) Three (3) 10.5 mmBtu/hr boilers, identified as Boiler-1, Boiler-2 and Boiler 3, all installed in 1969, each capable of combusting either natural gas or No. 2 fuel oil, with no controls, and exhausting to stack S1.

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

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

- (a) Eight (8) plastisol closure gasket curing line, identified as plastisol, consisting of one natural gas-fired curing oven, with no controls, and exhausting to stack S20.

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

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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]

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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]

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

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

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

### B.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

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

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

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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)]

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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)]

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- (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)]

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

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

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

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

and

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

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
- (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;
  - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
  - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

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

B.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) The Permittee shall implement the PMPs, including any required record keeping as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

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

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
  - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;
  - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
  - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality,  
Compliance Section), or  
Telephone Number: 317-233-5674 (ask for Compliance Section)  
Facsimile Number: 317-233-5967

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

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

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

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

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

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

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

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

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

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
  - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
  - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
  - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
  - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ has issued the modification. [326 IAC 2-7-12(b)(8)]

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

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

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

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

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

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

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

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

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

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- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
  - (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

**B.16 Permit Renewal** [326 IAC 2-7-4]

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

Request for renewal shall be submitted to:

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

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
- (1) A timely renewal application is one that is:
- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]  
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.
- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]  
If IDEM, OAQ fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

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

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:
- Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015
- Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

- (d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

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

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

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

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- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:
- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
  - (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
  - (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
  - (4) The Permittee notifies the:  
  
Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015  
  
and  
  
United States Environmental Protection Agency, Region V  
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590  
  
in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and
  - (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

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

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:
- (1) A brief description of the change within the source;
  - (2) The date on which the change will occur;
  - (3) Any change in emissions; and
  - (4) Any permit term or condition that is no longer applicable as a result of the change.

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

- (c) Emission Trades [326 IAC 2-7-20(c)]  
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

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

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

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

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

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

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

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

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

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

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

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

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

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

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

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Notwithstanding the conditions of this permit that state specific methods that may be used to demonstrate compliance with, or a violation of, applicable requirements, any person (including the Permittee) may also use other credible evidence to demonstrate compliance with, or a violation of, any term or condition of this permit.

**SECTION C**

**SOURCE OPERATION CONDITIONS**

Entire Source

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

**C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [40 CFR 52 Subpart P][326 IAC 6-3-2]**

- (a) Pursuant to 40 CFR 52 Subpart P, particulate matter emissions from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- (b) Pursuant to 326 IAC 6-3-2(e)(2), 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. This condition is not federally enforceable.

**C.2 Opacity [326 IAC 5-1]**

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

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

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

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

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

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

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

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

**C.6 Operation of Equipment [326 IAC 2-7-6(6)]**

Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission unit(s) vented to the control equipment is in operation.

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 asbestos containing material increases or decreases by at least twenty percent (20%); or
  - (2) If there is a change in the following:
    - (A) Asbestos removal or demolition start date;
    - (B) Removal or demolition contractor; or
    - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

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

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

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

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

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

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

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM 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]**

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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)]**

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

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

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

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

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

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

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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 Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**

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

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

**C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]**

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

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:

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

within ninety (90) days after the date of issuance of this permit.

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

- (c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) 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 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:
  - (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.
  - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
  - (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
  - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
  - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be ten (10) days or more until the unit or device will be shut down, then the Permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down. The notification shall also include the status of the applicable compliance monitoring parameter with respect to normal, and the results of the response actions taken up to the time of notification.

- (4) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
  - (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.
  - (3) An automatic measurement was taken when the process was not operating.
  - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when, in accordance with Section D, response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

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- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
  - (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
  - (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

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

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

**C.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(b)(2), starting in 2005 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:
- (1) Indicate estimated actual emission of pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
  - (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, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

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

- (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]**

- (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, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) 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.

### **Stratospheric Ozone Protection**

#### **C.20 Compliance with 40 CFR 82 and 326 IAC 22-1**

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Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

## SECTION D.1

## FACILITY OPERATION CONDITIONS

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

- (a) One (1) coating line, identified as Coat-1, constructed in 1967, with a maximum capacity of 9000 aluminum metal sheets per hour and using reverse roll coating applicators, consisting of a lacquer coating machine and a natural gas-fired curing oven, exhausting to a catalytic oxidizer with a heat input of 12.3 mmBtu/hr, and exhausting to stack S5.
- (b) One (1) coating line, identified as Coat-2, constructed in 1967, with a maximum capacity of 9000 aluminum metal sheets per hour and using reverse roll coating applicators, consisting of a lacquer coating machine, an offset lithographic press and a natural gas-fired curing oven, exhausting to a catalytic oxidizer with a heat input of 12.3 mmBtu/hr, and exhausting to stack S8.
- (c) One (1) coating line, identified as Coat-3, constructed in 1967, with a maximum capacity of 6000 aluminum metal sheets per hour and using reverse roll coating applicators, consisting of a lacquer coating machine and a natural gas-fired curing oven, exhausting to a catalytic oxidizer with a heat input of 9.0 mmBtu/hr, and exhausting to stack S10.
- (d) One (1) coating line, identified as Coat-4, constructed in 1967, with a maximum capacity of 6000 aluminum metal sheets per hour and using reverse roll coating applicators, consisting of a lacquer coating machine and a natural gas-fired curing oven, exhausting to a catalytic oxidizer with a heat input of 9.0 mmBtu/hr, and exhausting to stack S12.

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

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

#### D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

- (a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating), no owner or operator of a facility engaged in the surface coating of miscellaneous metal parts may cause or allow, or permit the discharge into the atmosphere of any volatile organic compounds in excess of 3.5 pounds of VOC per gallon of coating excluding water, after controls, delivered to the coating lines for forced warm air dried coatings.
- (b) Pursuant to 326 IAC 8-1-2 (b), the coating lines # 1 through 4 VOC emissions shall be limited to no greater than the equivalent emissions, expressed as pounds of VOC per gallon of coating solids, allowed in (a).

This equivalency was determined by the following equation:

$$E = L / (1 - (L/D))$$

Where

- L= Applicable emission limit from 326 IAC 8 in pounds of VOC per gallon of coating;
- D= Density of VOC in coating in pounds per gallon of VOC;
- E= Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.

Actual solvent density shall be used to determine compliance of the surface coating operation using the compliance methods in 326 IAC 8-1-2 (a).

- (c) The pounds of VOC per gallon of coating solids shall be limited to less than E determined in (b) above.
- (d) Pursuant to 326 IAC 8-1-2(c), the overall efficiency of the thermal oxidizer shall be no less than the equivalent overall efficiency calculated by the following equation:

$$O = \frac{V - E}{V} \times 100$$

Where:

- V = The actual VOC content of the coating or, if multiple coatings are used, the daily weighted average VOC content of all coatings, as applied to the subject coating line as determined by the applicable test methods and procedures specified in 326 IAC 8-1-4 in units of pounds of VOC per gallon of coating solids as applied.
- E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.
- O = Equivalent overall efficiency of the capture system and control device as a percentage.

The overall efficiency of the thermal oxidizer shall be greater than (O).

- (e) Pursuant to 326 IAC 8-2-9(f), all solvents sprayed from the application equipment of coating lines during cleanup or color changes shall be directed into containers. Said containers shall be closed as soon as the solvent spraying is complete. In addition, all waste solvent shall be disposed of in such a manner that minimizes evaporation.

D.1.2 PSD Minor Limit [326 IAC 2-2]

- (a) Pursuant to significant permit revision 177-11458-00001, issued on December 16, 1999, the input of VOC to the coating lines and plastisol operation, including cleanup solvent before control (the usage of cleanup solvent may need to take into account any recycling of cleanup rags or reused solvent) shall be less than 1602 tons per 12 consecutive month period with compliance determined at the end of each month. The limits are as follows:

Facility	Input VOC Limit , before Controls (tons/year)	Emission Limit, after Controls, (tons/year)
Insignificant Activities	1.08	1.08
Boilers and Coating Lines 1 & 2 Catalytic Oxidizers	0.72	0.72
8 Plastisol Curing Lines	8.4	8.4
Coating Lines 1,2,3 & 4	1592	238.8
Total	1602	249

- (b) The minimum overall efficiency shall be 85%. This input VOC limit before control in conjunction with the operation of the catalytic oxidizers at an overall control efficiency of 85% will limit the potential to emit of VOC after control to less than 250 tons per 12 consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.1.3 General Provisions Relating to HAPs [326 IAC 20-1][40 CFR Part 63, Subpart A] [Table 12 to 40 CFR Part 63, Subpart KKKK] [40 CFR 63.3501]

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- (a) The provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1, apply to the affected source, except when otherwise specified by Table 5 to 40 CFR Part 63, Subpart KKKK. The Permittee must comply with these requirements on and after the effective date of the National Emission Standards for Hazardous Air Pollutants.
- (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.

D.1.4 National Emission Standards for Hazardous Air Pollutants: Surface Coating of Metal Cans [40 CFR Part 63, Subpart KKKK] [40 CFR 63.3561] [40 CFR 63.3481] [40 CFR 63.3482] [40 CFR 63.3483(b)]

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- (a) The provisions of 40 CFR Part 63, Subpart KKKK (National Emission Standards for Hazardous Air Pollutants: Surface Coating of Metal Cans) apply to the affected source. A copy of this rule is available on the US EPA Air Toxics Website at <http://www.epa.gov/ttn/atw/mcan/mcanpg.html>. Pursuant to 40 CFR 63.3483(b), the Permittee must comply with these requirements on and after the date 3 years after the effective date of 40 CFR Part 63, Subpart KKKK.
- (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.
- (c) The affected source is the collection of all of the items listed in 40 CFR 63.3482, paragraphs (b)(1) through (4) that are used for surface coating of metal cans and ends (including decorative tins), or metal crowns or closures:
  - (1) All coating operations as defined in 40 CFR 63.3561;
  - (2) All storage containers and mixing vessels in which coatings, thinners, and cleaning materials are stored or mixed;
  - (3) All manual and automated equipment and containers used for conveying coatings, thinners, and cleaning materials; and
  - (4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.
- (d) Terminology used in this section are defined in the CAA, in 40 CFR Part 63, Section 63.2, and in 40 CFR 63.3561, and are applicable to the affected source.

D.1.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

## Compliance Determination Requirements

### D.1.6 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

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In order to demonstrate compliance with Condition D.1.1 and D.1.2, the Permittee shall perform inlet and outlet VOC testing of the catalytic oxidizers according utilizing methods as approved by the Commissioner. This test shall be repeated at least once every two and one-half (2.5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C- Performance Testing.

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

### D.1.7 Catalytic Oxidizer temperature

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- (a) A continuous monitoring system shall be calibrated, maintained, and operated on the catalytic oxidizer for measuring operating temperature. The output of this system shall be recorded as a 3-hour average. The Permittee shall operate the thermal oxidizer at or above the hourly average temperature given below.
- (b) The Permittee shall operate the catalytic oxidizer at a 3-hour hourly average temperature as shown below, to maintain no less than 85% overall control efficiency.  
Coating Line-1 Oxidizer: 620 °F  
Coating Line-2 Oxidizer: 615 °F  
Coating Line-3 Oxidizer: 650 °F  
Coating Line-4 Oxidizer: 650 °F
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

### D.1.8 Monitoring [40 CFR 64]

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- (a) The coating lines # 1 through 4 have applicable compliance monitoring conditions, pursuant to 40 CFR 64, as specified below:
  - (1) The Permittee shall install, operate, and maintain gas temperature monitor according to paragraphs (b) (1) (C) through (E) of this section.
    - (A) The gas temperature monitor must complete a minimum of one cycle of operation for each successive 15-minute period. The Permittee shall have a minimum of four equally spaced successive cycles of gas temperature monitor operation in 1 hour.
    - (B) The Permittee shall determine the average of all recorded readings for each successive 3-hour period of the emission capture system and catalytic thermal oxidizer operation.
    - (C) The Permittee shall record the results of each inspection, calibration, and validation check of the gas temperature monitor.
    - (D) The Permittee shall maintain the gas temperature monitor at all times and have available necessary parts for routine repairs of the monitoring equipment.

- (E) The Permittee shall operate the gas temperature monitor and collect emission capture system and add-on control device parameter data at all times that a controlled coating operation is operating, except during monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, if applicable, calibration checks and required zero and span adjustments).
  - (F) The Permittee shall not use emission capture system or add-on control device parameter data recorded during monitoring malfunctions, associated repairs, out of control periods, or required quality assurance or control activities when calculating data averages. You must use all the data collected during all other periods in calculating the data averages for determining compliance with the emission capture system and add-on control device operating limits.
  - (G) A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the gas temperature monitor to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions. Any period for which the monitoring system is out of control and data are not available for required calculations is a deviation from the monitoring requirements.
- (2) Capture system bypass line. The Permittee shall meet the requirements of paragraph (b)(2)(A) or (B) of this section for each emission capture system that contains bypass lines that could divert emissions away from the add-on control device to the atmosphere.
- (A) Properly install, maintain, and operate a flow indicator that takes a reading at least once every 15 minutes. The flow indicator shall be installed at the entrance to any bypass line.
  - (B) Secure the bypass line valve in the nondiverting position with a car-seal or lock-and-key type configuration. A visual inspection of the seal or closure mechanism shall be performed at least once every month to ensure the valve is maintained in the nondiverting position, and the vent stream is not diverted through the bypass line.
- (3) The Permittee shall meet the requirements in paragraphs (b)(3) (A) through (B) of this section for each gas temperature monitoring device.
- (A) Locate the temperature sensor in a position that provides a representative temperature.
  - (B) Use a temperature sensor with a minimum accuracy of  $\pm 1.2$  degrees Celsius or  $\pm 1$  percent of the temperature value in degrees Celsius, whichever is larger.

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

### D.1.9 Record Keeping Requirements

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- (a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) 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 Conditions D.1.1 and D.1.2. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
- (1) The VOC content of each coating material and solvent used.
  - (2) The amount of coating material and solvent used less water on monthly basis.
    - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
    - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
  - (3) The volume weighted VOC content of the coatings used for each month;
  - (4) The cleanup solvent usage for each month;
  - (5) The total VOC usage for each month; and
  - (6) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.1.8, the Permittee shall maintain a log of catalytic oxidizer temperatures and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

### D.1.10 Reporting Requirements

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A quarterly summary of the information to document compliance with Condition D.1.2 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 2-1.1-1(1).

### D.1.11 Notification Requirements [40 CFR 63.3510]

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- (a) General. The Permittee must submit the notifications in 40 CFR 40 CFR 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) that apply to the Permittee by the dates specified in those sections, except as provided in 40 CFR 63.3510, paragraphs (b) and (c).
- (b) Initial notification. The Permittee must submit the Initial Notification no later than the effective date of 40 CFR Part 63, Subpart KKKK.

- (c) Notification of compliance status. The Permittee must submit the Notification of Compliance Status required by 40 CFR 63.9(h) no later than 30 calendar days following the end of the initial compliance period described in 40 CFR 63.3520, 40 CFR 63.3530, 40 CFR 63.3540, or 40 CFR 63.3550 that applies to the affected source. The Notification of Compliance Status must contain the information specified in 40 CFR 63.3510, paragraphs (c)(1) through (9) and any additional information in 40 CFR 63.9(h).

D.1.12 Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12][326 IAC 2-7-5]

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The Permittee shall submit an application for a significant permit modification to IDEM, OAQ to include information regarding which compliance option or options will be chosen in the Part 70 permit.

- (a) The significant permit modification application shall be consistent with 326 IAC 2-7-12, including information sufficient for IDEM, OAQ to incorporate into the Part 70 permit the applicable requirements of 40 CFR 63, Subpart KKKK, a description of the affected source and activities subject to the standard, and a description of how the Permittee will meet the applicable requirements of the standard.
- (b) The significant permit modification application shall be submitted no later than twenty-seven months after the effective date of 40 CFR 63, Subpart KKKK.
- (c) The significant permit modification application shall be submitted to:

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

## SECTION D.2

## FACILITY OPERATIONS CONDITIONS

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

Three (3) 10.5 mmBtu/hr boilers, identified as Boiler-1, Boiler-2 and Boiler-3, all installed in 1969, each capable of combusting either natural gas or No. 2 fuel oil, with no controls, and exhausting to stack S1.

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

#### **D.2.1 Particulate Matter (PM) [326 IAC 6-2-3(3)(d)]**

Pursuant to 326 IAC 6-2-3 (3)(d), Particulate emission limitations for sources of indirect heating), the particulate matter emissions from the three (3) 10.5 mmBtu per hour natural gas boilers shall each be limited to 0.8 pounds per mmBtu.

#### **D.2.2 General Provisions Relating to NESHAP [326 IAC 20-1] [40 CFR Part 63, Subpart A]**

The provisions of 40 CFR 63 Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the affected sources as designated by 40 CFR 63.7506(b). The Permittee must comply with these requirements on and after the effective date of 40 CFR 63, Subpart DDDDD.

#### **D.2.3 National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters [40 CFR Part 63, Subpart DDDDD]**

- (a) The affected sources are subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers and Process Heaters, (40 CFR 63, Subpart DDDDD), as of the effective date of 40 CFR 63, Subpart DDDDD. Pursuant to this rule, the Permittee must comply with 40 CFR 63, Subpart DDDDD on and after three years after the effective date of 40 CFR 63, Subpart DDDDD.
- (b) The following emissions units comprise the affected source for the limited use gaseous fuel subcategory: Three (3) 10.5 mmBtu/hr boilers, identified as Boiler-1, Boiler-2 and Boiler-3
- (c) The definitions of 40 CFR 63, Subpart DDDDD at 40 CFR 63.7575 are applicable to the affected sources.

#### **D.2.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]**

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

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

#### **D.2.5 Visible Emissions Notations**

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

- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan – Preparation, Implementation Records and Reports 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.2.6 Record Keeping Requirements

- (a) If the fuel supplier certification is used to demonstrate compliance, when burning alternate fuels and not determining compliance pursuant to 326 IAC 3-7-4, the following, as a minimum, shall be maintained:
  - (1) Fuel supplier certifications;
  - (2) The name of the fuel supplier; and
  - (3) A statement from the fuel supplier that certifies the sulfur content of the fuel oil.

The Permittee shall retain records of all recording/monitoring data and support information for a period of five (5) years, or longer if specified elsewhere in this permit, from the date of the monitoring sample, measurement, or report. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.

- (b) To document compliance with Condition D.2.5, the Permittee shall maintain records of visible emission notations of the three (3) boilers stack exhaust once per shift.
- (c) To document compliance with Condition D.2.4, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.2.7 National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters - Notification Requirements [40 CFR 63, Subpart DDDDD]

- (a) Pursuant to 40 CFR 63.7545(a) and 40 CFR 63.7506(b), the Permittee shall submit an Initial Notification containing the information specified in 40 CFR 63.9(b)(2) not later than 120 days after the effective date of 40 CFR 63, Subpart DDDDD as required by 40 CFR 63.7545(b).
- (b) The notification required by paragraph (a) shall be submitted to:

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

and

United States Environmental Protection Agency, Region V  
Director, Air and Radiation Division  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

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

D.2.8 Reporting Requirements

- (a) The natural gas boiler certification 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 its equivalent, within thirty (30) days after the end of the six (6) month period being reported. The natural gas-fired boiler certification does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
  
- (b) A semi-annual summary of the information to document compliance with Condition 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 six (6) month period 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 D.3

### FACILITY OPERATIONS CONDITIONS

**Facility Description [326 IAC 2-7-5(15)]:** Insignificant Activities consisting of:

Eight (8) plastisol closure gasket curing lines, identified as plastisol, consisting of one natural gas-fired curing oven for each line, with no controls, and exhausting to stack S20.

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

#### D.3.1 Particulate [326 IAC 6-3-2(e)]

Pursuant to 326 IAC 6-3-2(e) (Particulate Emissions Limitations for Manufacturing Process), the particulate emission rate from each plastisol line shall not exceed 2.736 pounds per hour when operating at a process weight rate of 1630 pounds per hour.

This emission limitation was calculated using the following equation:

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

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

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

**PART 70 OPERATING PERMIT  
CERTIFICATION**

Source Name: Silgan Closures, LLC  
Source Address: 1701 Williamsburg Pike, Richmond, IN 47375  
Mailing Address: 1701 Williamsburg Pike, Richmond, IN 47375  
Part 70 Permit No.: T177-17668-00001

**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  
P.O. Box 6015  
Indianapolis, Indiana 46206-6015  
Phone: 317-233-5674  
Fax: 317-233-5967**

**PART 70 OPERATING PERMIT  
EMERGENCY OCCURRENCE REPORT**

Source Name: Silgan Closures, LLC  
Source Address: 1701 Williamsburg Pike, Richmond, IN 47375  
Mailing Address: 1701 Williamsburg Pike, Richmond, IN 47375  
Part 70 Permit No.: T177-17668-00001

**This form consists of 2 pages**

**Page 1 of 2**

- |  |
|--|
| <input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12) <ul style="list-style-type: none"><li>C The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and</li><li>C The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16.</li></ul> |
|--|

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 <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by:

Title / Position:

Date:

Phone:

A certification is not required for this report.

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

**PART 70 OPERATING PERMIT  
SEMI-ANNUAL NATURAL GAS FIRED BOILER CERTIFICATION**

Source Name: Silgan Closures, LLC  
Source Address: 1701 Williamsburg Pike, Richmond, IN 47375  
Mailing Address: 1701 Williamsburg Pike, Richmond, IN 47375  
Part 70 Permit No.: T177-17668-00001

Natural Gas Only  
 Alternate Fuel burned  
From: \_\_\_\_\_ To: \_\_\_\_\_

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:

A certification by the responsible official as defined by 326 IAC 2-7-1(34) is required for this report.

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

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

Source Name: Silgan Closures, LLC  
Source Address: 1701 Williamsburg Pike, Richmond, IN 47375  
Mailing Address: 1701 Williamsburg Pike, Richmond, IN 47375  
Part 70 Permit No.: T177-17668-00001

Months: \_\_\_\_\_ to \_\_\_\_\_ Year: \_\_\_\_\_

Page 1 of 2

<p>This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".</p>	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

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

Form Completed By:

Title/Position:

Date:

Phone:

Attach a signed certification to complete this report.

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

**Part 70 Quarterly Report**

Source Name: Silgan Closures, LLC  
 Source Address: 1701 Williamsburg Pike, Richmond, IN 47375  
 Mailing Address: 1701 Williamsburg Pike, Richmond, IN 47375  
 Part 70 Permit No.: T177-17668-00001  
 Facility: Coating lines # 1 through 4 and plastisol  
 Parameter: VOC  
 Limit: The usage of VOC shall be limited to less than 1592 tons per 12 consecutive month period, with compliance determined at the end of each month.

YEAR:

Facility	Month 1			Month 2			Month 3		
	This month, Input VOC Usage Before Controls	Previous 11 Months Input VOC Usage Before Controls	12 Month Total Months Input VOC Usage Before Controls	This month, Input VOC Usage Before Controls	Previous 11 Months Input VOC Usage Before Controls	12 Month Total Months Input VOC Usage Before Controls	This month, Input VOC Usage Before Controls	Previous 11 Months Input VOC Usage Before Controls	12 Month Total Months Input VOC Usage Before Controls
Coating Lines 1,2,3 &4									
Plastisol									

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter

Deviation has been reported on: \_\_\_\_\_

Attach a signed certification to complete this report.

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

## Indiana Department of Environmental Management Office of Air Quality

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

#### Source Background and Description

<b>Source Name:</b>	<b>Silgan Closures, LLC</b>
<b>Source Location:</b>	<b>1701 Williamsburg Pike, Richmond, IN 47375</b>
<b>County:</b>	<b>Wayne</b>
<b>SIC Code:</b>	<b>3466, 3469, and 3559</b>
<b>Operation Permit No.:</b>	<b>177-7533-00001</b>
<b>Operation Permit Issuance Date:</b>	<b>March 17, 1999</b>
<b>Permit Renewal No.:</b>	<b>177-17668-00001</b>
<b>Permit Reviewer:</b>	<b>Rajesh Thotakura / EVP</b>

The Office of Air Quality (OAQ) has reviewed a Part 70 Operating Permit Renewal application from Silgan Closures, LLC relating to the operation of stationary fabrication of metals products plant.

#### Permitted Emission Units and Pollution Control Equipment

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

- (a) One (1) coating line, identified as Coat-1, constructed in 1967, with a maximum capacity of 9000 aluminum metal sheets per hour and using reverse roll coating applicators, consisting of a lacquer coating machine and a natural gas-fired curing oven, exhausting to a catalytic oxidizer with a heat input of 12.3 mmBtu/hr, and exhausting to stack S5.
- (b) One (1) coating line, identified as Coat-2, constructed in 1967, with a maximum capacity of 9000 aluminum metal sheets per hour and using reverse roll coating applicators, consisting of a lacquer coating machine, an offset lithographic press and a natural gas-fired curing oven, exhausting to a catalytic oxidizer with a heat input of 12.3 mmBtu/hr, and exhausting to stack S8.
- (c) One (1) coating line, identified as Coat-3, constructed in 1967, with a maximum capacity of 6000 aluminum metal sheets per hour and using reverse roll coating applicators, consisting of a lacquer coating machine and a natural gas-fired curing oven, exhausting to a catalytic oxidizer with a heat input of 9.0 mmBtu/hr, and exhausting to stack S10.
- (d) One (1) coating line, identified as Coat-4, constructed in 1967, with a maximum capacity of 6000 aluminum metal sheets per hour and using reverse roll coating applicators, consisting of a lacquer coating machine and a natural gas-fired curing oven, exhausting to a catalytic oxidizer with a heat input of 9.0 mmBtu/hr, and exhausting to stack S12.
- (e) Three (3) 10.5 mmBtu/hr boilers, identified as Boiler-1, Boiler-2 and Boiler 3, all installed in 1969, each capable of combusting either natural gas or No. 2 fuel oil, with no controls, and exhausting to stack S1.

#### Unpermitted Emission Units and Pollution Control Equipment

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

## Insignificant Activities

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour;
- (b) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 Btu/hr, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 Btu/hr;
- (c) 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;
- (d) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons;
- (e) Vessels storing lubricating oils, hydraulic oils, machining oils and machining fluids;
- (f) Machining where an aqueous cutting coolant continuously floods the machining interface (Machine Shop);
- (g) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6 (Cold Cleaners);
- (h) The following equipment related to manufacturing activities not resulting in the emission of HAPs; brazing equipment, cutting torches, soldering equipment or welding equipment;
- (i) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume;
- (j) Quenching operations used heat treating processes (Oil quench in Machine Shop);
- (k) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment (Roto-Clone and other systems throughout the plant.);
- (l) Process vessel degassing and cleaning to prepare for internal repairs;
- (m) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone;
- (n) Paved and unpaved roads and parking lots with public access;
- (o) Asbestos abatement projects regulated by 326 IAC 14-10;
- (p) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks and fluid handling equipment;
- (q) Blowdown for any of the following: sight glass; boiler; compressors; pumps and cooling tower;
- (r) On-site fire and emergency response training approved by the department;
- (s) Diesel generators not exceeding 1600 horsepower (One at 158 hp);

- (t) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying and woodworking operations. (Machine Shop and Maintenance Shop);
- (u) A laboratory as defined in 326 IAC 2-7-1(21)(C);
- (v) Isophorone bubbling;
- (w) PVC extrusion and molding;
- (x) The following tanks: #498 (MIBK), #499 (Xylene), #533 (Isophorone), #633 (Reclaim Solvent), #2675 (Varnish) and #D001 (Waste Solvent); and
- (y) Eight (8) plastisol closure gasket curing line, identified as plastisol, consisting of one natural gas-fired curing oven, with no controls, and exhausting to stack S20.

### Existing Approvals

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

- (a) Part 70 permit no. T177-7533-00001, issued on March 17, 1999;
- (b) First significant permit modification no. 177-11458-00001, issued on December 16, 1999;
- (c) First administrative amendment no. 177-14708-00001, issued on August 21, 2001; and
- (d) Second administrative amendment no. 177-15770-00001, issued on July 2, 2002.

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

### Enforcement Issue

There are no enforcement actions pending.

### Recommendation

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

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

An administratively complete Part 70 permit renewal application for the purposes of this review was received on June 11, 2003. Additional information was received January 20, 2004, February 10, 2004, February 11, 2004, March 18, 2004 and April 12, 2004.

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

## Emission Calculations

See Appendix A of this document for detailed emissions calculations (six (6) pages).

## Potential to Emit of the Source

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

The source was issued a Part 70 Operating Permit on March 17, 1999. The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered enforceable only after issuance of the original Part 70 operating Permit and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/emission unit	Potential to Emit (tons/year)						
	PM	PM-10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
Coating Lines	0	0	0	1538.17	0	0	691.94
Plastisol	3.46	3.46	0	0.9	0	0	0
Natural gas Boiler	0.3	1	0.1	0.8	11.6	13.8	0.165
Total PTE	3.76	4.46	0.1	1539.87	11.6	13.8	692.105

- (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 any single HAP is equal to or greater than ten (10) tons per year and/or 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.
- (c) **Fugitive Emissions**  
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD applicability.

## Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2002 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	0.81
PM-10	0.81
SO <sub>2</sub>	0.0547
VOC	41.956
CO	7.656
NO <sub>x</sub>	9.118
HAP (specify)	24.6

### County Attainment Status

The source is located in Wayne County.

Pollutant	Status
PM-10	Attainment
SO <sub>2</sub>	Attainment
NO <sub>2</sub>	Attainment
Ozone	Attainment
CO	Attainment
Lead	Not Designated

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Wayne County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.
- (b) Wayne County has been classified as attainment or unclassifiable for all criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.

### 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.

### Federal Rule Applicability

- (a) Boiler 1, Boiler 2 and Boiler 3 constructed in 1969 are not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.40, Subpart Dc), because construction commenced prior to June 9, 1989.
- (b) This source is not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.43, Subpart QQ), Standards of Performance for the Graphic Arts Industry: Publication Rotogravure Printing, because the printing presses are offset lithography and not publication rotogravure.
- (c) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), Subpart KK, National Emission Standards for the Printing and Publishing Industry, because the printing presses are offset lithography and not publication rotogravure, product and packaging rotogravure or wide-web flexographic.
- (d) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), Subpart QQQQ, National Emission Standards for the Surface Coating of Wood Building Products, because the source does not apply coating to the products that contain more than fifty (50) percent by weight of wood or wood fiber.
- (e) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), Subpart OOOO, National Emission Standards for the Printing, Coating, and Dyeing of Fabrics and Other Textiles, because the source does not apply printing / coating to the products that contain fabrics or other textiles.
- (f) This source is not subject to the requirements of the National Emission standards for Hazardous Air Pollutants (NESHAP), Subpart MMMM, National Emissions Standards for the Surface Coating of Miscellaneous Metal Parts and Products, because the source fabricates and coats metal closures, which is included under affected source category in Subpart KKKK. Pursuant to 40 CFR 63.3481(c) (5), Subpart MMMM will cover surface coating of all the miscellaneous metal parts and products that are not *explicitly covered by another subpart*. Therefore, the source is not subject to Subpart MMMM as it is subject to Subpart KKKK.
- (f) This source is not subject to the National Emission Standards for Hazardous Air Pollutants, 40 CFR 63.460 Subpart T because they do not use in the degreaser any solvent containing the following as a cleaning or drying agent:
  - (1) perchloroethylene
  - (2) trichloroethylene
  - (3) 1,1,1-trichloroethane
  - (4) carbon tetrachloride
  - (5) chloroform
  - (6) methylene chloride

#### 40 CFR 63, Subpart KKKK

- (a) The provisions of 40 CFR Part 63, Subpart KKKK (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Metal Cans) apply to the affected source (Coating lines # 1 through 4) because the potential HAP emissions from the source are greater than the major source thresholds of 10 tons per year (for single HAP)/25 tons per year (for combination of HAPS) and also meets the definition of a metal cans surface coating facility . A copy of this rule is available on the US EPA Air Toxics Website at <http://www.epa.gov/ttn/atw/misc/miscpg.html>. Pursuant to 40 CFR 63.3483(b), the Permittee must comply with these requirements on and after the date 3 years after the effective date of 40 CFR Part 63, Subpart KKKK.
- (b) The provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1, apply to the affected source (Coating lines # 1 through 4), except when otherwise specified by Table 5 to 40 CFR Part 63, Subpart KKKK. The Permittee must comply with these requirements on and after the effective date of the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Metal Cans.
- (c) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (b) of this condition.
- (d) The affected source is the collection of all of the items listed in 40 CFR 63.3482, paragraphs (b)(1) through (4) that are used for surface coating of metal cans and ends (including decorative tins), or metal crowns or closures: Even though the coating lines 1 through 4 does not involve in surface coating metal cans or can ends, it is still subject to 40 CFR 63, Subpart KKKK because the coating coat metal closures.
- (1) All coating operations as defined in 40 CFR 63.3561;
  - (2) All storage containers and mixing vessels in which coatings, thinners, and cleaning materials are stored or mixed;
  - (3) All manual and automated equipment and containers used for conveying coatings, thinners, and cleaning materials; and
  - (4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.

Terminology used in this section are defined in the CAA, in 40 CFR Part 63, Section 63.2, and in 40 CFR 63.3561, and are applicable to the affected source.

#### 40 CFR 63, Subpart DDDDD

- (a) Three (3) boilers, Identified as Boiler-1, Boiler-2 and Boiler-3 are subject to the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63, Subpart DDDDD. The Three (3) boilers comprise one existing affected source for the large gaseous fuel subcategory, as defined by 40 CFR 63.7506(b), because they meet the criteria in the definition in 40 CFR 63.7575 for the large gaseous fuel subcategory. The provisions of 40 CFR 63 Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the affected sources after the effective date of 40 CFR 63, Subpart DDDDD, except when otherwise specified in 40 CFR 63 Subpart DDDDD. This rule is not yet published in the Federal Register. A copy of the signed, final rule is available at <http://www.epa.gov/ttn/atw/boiler/boilerpg.html>.

- (b) Pursuant to 40 CFR 63.7506(b), the only requirements that apply to the existing affected sources for the the large gaseous fuel subcategory, and the limited use gaseous fuel subcategory are the initial notification requirements in 40 CFR 63.9(b). The Permittee shall submit an Initial Notification containing the information specified in 40 CFR 63.9(b)(2) not later than 120 days after the effective date of 40 CFR 63, Subpart DDDDD as required by 40 CFR 63.7545(b).

#### 40 CFR 64, Compliance Assurance Monitoring

- (a) The requirements of 40 CFR Part 64, Compliance Assurance Monitoring, apply to a pollutant-specific emissions unit (PSEU), as defined in 40 CFR 64.1, at a major source that is required to obtain a Part 70 or 71 permit if the PSEU meets the following criteria:
- (1) the unit is subject to an emission limitation or standard for an applicable regulated air pollutant,
  - (2) the unit uses a control device as defined in 40 CFR 64.1 to comply with that emission limitation or standard, and
  - (3) the unit has a potential to emit (PTE) before controls equal to or greater than 100 percent of the amount (tons per year) of the pollutant required for a source to classified as a Part 70 major source.

This source was issued initial Part 70 permit no. T177-7533-00001, on March 17, 1999. The four (4) coating lines as PSEUs have uncontrolled PTE at greater than 100 percent of the applicable major Part 70 threshold, uses a control device (Catalytic Oxidizer) as defined in 40 CFR 64.1 to comply with the VOC emission limitation of 249 tons per year. The PSEUs meets the criteria for Compliance Assurance Monitoring applicability. Hence 40 CFR Part 64, Compliance Assurance Monitoring, are applicable to the coating lines.

The coating lines will be subject to the requirements of 40 CFR 63, Subpart KKKK, three (3) years from the effective date. IDEM believes that the Compliance Assurance Monitoring requirements must be consistent with the monitoring requirements of 40 CFR 63, Subpart KKKK. Compliance with the monitoring requirements of 40 CFR 63, Subpart KKKK will satisfy the requirements of Compliance Assurance Monitoring. Therefore, the monitoring requirements for the 40 CFR 63, Subpart KKKK (emissions rate with add-on controls option) are used to satisfy Compliance Assurance Monitoring (40 CFR 64) rule.

- (b) The pollutant-specific emission unit is not a "large unit" as described in 40 CFR 64.5. Therefore, the owner or operator has submit a CAM plan pursuant to 40 CFR 64 as part of the Part 70 renewal application.

The compliance monitoring requirements applicable to all the four (4) coating lines using catalytic oxidizers for volatile organic compounds (VOC) control, which shall satisfy the 40 CFR 64 Compliance Assurance Monitoring Requirements, are as follows:

- (1) The Permittee shall install, operate, and maintain gas temperature monitor according to paragraphs (b) (1) (C) through (E) of this section.
  - (A) The gas temperature monitor must complete a minimum of one cycle of operation for each successive 15-minute period. The Permittee shall have a minimum of four equally spaced successive cycles of gas temperature monitor operation in 1 hour.
  - (B) The Permittee shall determine the average of all recorded readings for each successive 3-hour period of the emission capture system and catalytic thermal oxidizer operation.

- (C) The Permittee shall record the results of each inspection, calibration, and validation check of the gas temperature monitor.
  - (D) The Permittee shall maintain the gas temperature monitor at all times and have available necessary parts for routine repairs of the monitoring equipment.
  - (E) The Permittee shall operate the gas temperature monitor and collect emission capture system and add-on control device parameter data at all times that a controlled coating operation is operating, except during monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, if applicable, calibration checks and required zero and span adjustments).
  - (F) The Permittee shall not use emission capture system or add-on control device parameter data recorded during monitoring malfunctions, associated repairs, out of control periods, or required quality assurance or control activities when calculating data averages. You must use all the data collected during all other periods in calculating the data averages for determining compliance with the emission capture system and add-on control device operating limits.
  - (G) A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the gas temperature monitor to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions. Any period for which the monitoring system is out of control and data are not available for required calculations is a deviation from the monitoring requirements.
- (2) Capture system bypass line. The Permittee shall meet the requirements of paragraph (b)(2)(A) or (B) of this section for each emission capture system that contains bypass lines that could divert emissions away from the add-on control device to the atmosphere.
- (A) Properly install, maintain, and operate a flow indicator that takes a reading at least once every 15 minutes. The flow indicator shall be installed at the entrance to any bypass line.
  - (B) Secure the bypass line valve in the nondiverting position with a car-seal or lock-and-key type configuration. A visual inspection of the seal or closure mechanism shall be performed at least once every month to ensure the valve is maintained in the nondiverting position, and the vent stream is not diverted through the bypass line.
- (3) The Permittee shall meet the requirements in paragraphs (b)(3) (A) through (B) of this section for each gas temperature monitoring device.
- (A) Locate the temperature sensor in a position that provides a representative temperature.
  - (B) Use a temperature sensor with a minimum accuracy of  $\pm 1.2$  degrees Celsius or  $\pm 1$  percent of the temperature value in degrees Celsius, whichever is larger.

### State Rule Applicability – Entire Source

#### 326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

The source was constructed in 1967, before the PSD applicability of August 7, 1977. This source is not a major stationary source because emissions of volatile organic compounds have always been less than 250 tons per year and it is not one of the 28 listed source categories. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply. The source was issued significant permit modification no. 177-11458-00001 on December 16, 1999, for relaxing the overall control efficiency of permitted catalytic oxidizers from 90 % to 85 %.

Pursuant to significant permit revision 177-11458-00001, issued on December 16, 1999, the input of VOC to the coating lines and plastisol operation, including cleanup solvent before control (the usage of cleanup solvent may need to take into account any recycling of cleanup rags or reused solvent) shall be less than 1602 tons per 12 consecutive month period with compliance determined at the end of each month. The limits are as follows:

Facility	Input VOC Limit , before Controls (tons/year)	Emission Limit, after Controls, (tons/year)
Insignificant Activities	1.08	1.08
Boilers and Coating Lines 1 & 2 Catalytic Oxidizers	0.72	0.72
8 Plastisol Curing Lines	8.4	8.4
Coating Lines 1,2,3 & 4	1592	238.8
Total	1602	249

The source has a potential to emit 1602 tons per year before controls. The source is using catalytic oxidizers as control equipment, with control efficiency of 85%, for all four (4) coating lines. The potential emissions, after controls, from the source are less than 250 tons per year. Though the source was constructed before the PSD applicability date of August 7, 1977, the source took emission limitations to be classified as a PSD minor source.

The source did not have any new constructions or modifications after August 7, 1977.

#### 326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting) because it has the potential to emit more than one hundred (100) tons per year of VOC. This statement must be received in accordance with the compliance schedule specified in 326 IAC 2-6-3 and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the period identified in 326 IAC 2-6.

#### 326 IAC 5-1 (Opacity Limitations)

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

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

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

The operation of coating lines # 1 through 4 will emit greater than 10 tons per year of a single HAP or 25 tons per year of a combination of HAPs. However, 326 IAC 2-4.1 will not apply, because it is subject to the NESHAP, 40 CFR 63, Subpart KKKK and also the coating lines were built prior to applicability date of July 27, 1997.

326 IAC 8-6 (Organic Solvent Emissions Limitation)

Pursuant to 326 IAC 8-6 (Organic Solvent Emission Limitations), no person shall emit or cause the emission of more than 100 tons per year of VOC from any source which commences operations after October 7, 1974 and prior to January 1, 1980 (items 1-4 above) unless all VOC emitted from such source are reduced by at least 85% from emissions which would occur before the application of any control equipment or process.

The four coating lines are not subject to this rule because the four coating lines were built in 1967, before the rule applicability date of October 7, 1974. The degreasing operations are not subject to this rule because they were built in 1967, before the rule applicability date of October 7, 1974.

**State Rule Applicability – Individual Facilities**

326 IAC 8-2-9 (Miscellaneous Metal Coating)

- (a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of the coating delivered to the applicator at the coating lines # 1 through 4 shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for forced warm air dried coatings.
- (b) Pursuant to 326 IAC 8-1-2 (b), the roll forming-metal process (adhesive application) VOC emissions shall be limited to no greater than the equivalent emissions, expressed as pounds of VOC per gallon of coating solids, allowed in (a).

This equivalency was determined by the following equation:

$$E = L / (1 - (L/D))$$

Where

- L = Applicable emission limit from 326 IAC 8 in pounds of VOC per gallon of coating;
- D = Density of VOC in coating in pounds per gallon of VOC;
- E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.

Actual solvent density shall be used to determine compliance of the surface coating operation using the compliance methods in 326 IAC 8-1-2 (a)

- (c) The pounds of VOC per gallon of coating solids shall be limited to less than 6.48 pounds of VOC per gallon of coating solids determined in (b) above.
- (d) Pursuant to 326 IAC 8-1-2(c), the overall efficiency of the catalytic oxidizer shall be no less than the equivalent overall efficiency calculated by the following equation:

$$O = \frac{V - E}{V} \times 100$$

Where:

- V = The actual VOC content of the coating or, if multiple coatings are used, the daily weighted average VOC content of all coatings, as applied to the subject coating line as determined by the applicable test methods and

procedures specified in 326 IAC 8-1-4 in units of pounds of VOC per gallon of coating solids as applied.

- E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.
- O = Equivalent overall efficiency of the capture system and control device as a percentage.

The overall efficiency of the catalytic oxidizer shall be greater than (O). The calculated value of overall efficiency of catalytic oxidizer is 70 %.

- (e) Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

For the source to comply with 8-1-2 (c), the overall efficiency of catalytic oxidizer must be greater than 70 %. The source is using a catalytic oxidizer, which has 85 % overall efficiency. Therefore, the source is in compliance with the requirements of 326 IAC 8-2-9.

#### 326 IAC 8-2-3 (Can Coating Operations)

The coating lines, identified as Coat-1 through 4, are used to coat the exterior surface of sheet metal. The operation at the coating lines does not involve base coating the interior of sheet metal or overvarnish and the operation at coating lines does not involve coating cans or can ends. The coating lines does not involve coating related to can coating operations. Pursuant to 326 IAC 8-2-3 (a), the operation at the coating lines does not meet the applicability criteria of 326 IAC 8-2-3. Therefore, the coating lines are not subject to the 326 IAC 8-2-3 (Can Coating Operations).

#### 326 IAC 6-2-3 (Particulate emission limitations for source of indirect heating.)

The three boilers identified as 1, 2 and 3, all installed in 1969, were existing and in operation before September 21, 1983, therefore, the particulate emissions shall be limited by the following equation:

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

- Where: 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 minute time period.
- Pt = Pounds of particulate matter emitted per million Btu heat input (lb/mmBtu).
- Q = Total source maximum operating capacity rating in mmBtu/hr heat input.
- 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.
- h = Stack height in feet.

$$Pt = \frac{50 * 0.67 * 55}{76.5 * (31.5)^{0.75} * (1)}$$

$$Pt = 1.82 \text{ lbs/mmBtu}$$

The emission rate of 1.82 lb/mmBtu, as derived pursuant to 326 IAC 6-2-3(a), is greater than the maximum allowable rate of 0.8 lb/mmBtu pursuant to 326 IAC 6-2-3(d). Therefore, the more stringent limit of 0.8 lb/mmBtu PM emission will apply.

Particulate matter emissions from the boiler are based on an emission factor of 2.0 lbs/kgal of oil burned. Based on the assumption that 1 gallon of oil combusted is equivalent to 140,000 Btu of heat input, the potential emissions from each of the 10.5 MMBtu/hr boilers are expected to be 0.015 lbs/MMBtu. Therefore, the boiler is capable of complying with this rule when combusting No.2 fuel oil.

326 IAC 6-3-2 (e) (Particulate Emissions Limitations for manufacturing Process)

- (a) Pursuant to 326 IAC 6-3-2(e) (Particulate Emissions Limitations for Manufacturing Process), the particulate emission rate from the plastisol operations shall not exceed 2.736 pounds per hour when operating at a process weight rate of 1630 pounds per hour.

This emission limitation was calculated using the following equation:

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

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

Based on the calculations made, the plastisol cure oven is in compliance with this requirement.

- (b) The coating lines, identified as coat-1 through 4, use reverse roll coat applicators for surface coating activities. Therefore, pursuant to 326 IAC 6-3-1(b) (6), the coating lines are exempt from the requirements of this rule.
- (c) The welding operations (items (h) described under insignificant activities) at each station, consume less than six hundred twenty-five (625) pounds of rod per day, the grinding operations (item (t) described under insignificant activities) have potential emissions less than 0.551 pounds per hour, and the torch cutting operations (items (h) described under insignificant activities) cut less than three thousand four hundred (3,000) inches per hour of stock one (1) inch thickness or less. Therefore, pursuant to 326 IAC 6-3-1(b), the welding, cutting, and grinding operations are exempt from the requirements of 326 IAC 6-3-2 (Particulate Emissions Limitations for Manufacturing Processes). However, 40 CFR 52 Subpart P (refer condition C.1 of part 70 renewal), still applies to these operations.

326 IAC 7-1 Sulfur Dioxide Emission Limitations

The potential to emit sulfur dioxide from each of the three boilers, 1, 2 and 3, is less than 25 tons per year each. Therefore, pursuant to 326 IAC 7-1, the sulfur dioxide emission limitations do not apply. See page 1 of 2 in Appendix A.

326 IAC 8-3 (Organic Solvent Degreasing Operations)

The degreasing operations (Insignificant Activity) were constructed prior to January 1, 1980 and is not located in one of the designated county in 326 IAC 8-3-1 (a) (1). Therefore, 326 IAC 8-3 will not apply.

## Testing Requirements

### 326 IAC 2-7-6(1), (6) (Testing Requirements)

In order to demonstrate compliance with Condition D.1.1 and D.1.2, the Permittee shall perform inlet and outlet VOC testing of the catalytic oxidizers according utilizing methods as approved by the Commissioner. This test shall be repeated at least once every two and one-half (2.5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C- Performance Testing.

## Compliance Requirements

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

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

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

- (a) The coating lines # 1 through 4 have applicable compliance monitoring conditions as specified below:
  - (1) A continuous monitoring system shall be calibrated, maintained, and operated on the catalytic oxidizer for measuring operating temperature. The output of this system shall be recorded as a 3-hour hourly average. The Permittee shall operate the thermal oxidizer at or above the 3-hour average temperature given below.
  - (2) The Permittee shall operate the catalytic oxidizers at a 3-hour average temperature as shown below, to maintain no less than 85% overall control efficiency.  
  
Coating Line-1 Oxidizer: 620 °F  
Coating Line-2 Oxidizer: 615 °F  
Coating Line-3 Oxidizer: 650 °F  
Coating Line-4 Oxidizer: 650 °F
  - (3) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.
- (b) The coating lines # 1 through 4 have applicable compliance monitoring conditions, pursuant to 40 CFR 64, as specified below:
  - (1) The Permittee shall install, operate, and maintain gas temperature monitor according to paragraphs (b) (1) (C) through (E) of this section.

- (A) The gas temperature monitor must complete a minimum of one cycle of operation for each successive 15-minute period. The Permittee shall have a minimum of four equally spaced successive cycles of gas temperature monitor operation in 1 hour.
  - (B) The Permittee shall determine the average of all recorded readings for each successive 3-hour period of the emission capture system and catalytic thermal oxidizer operation.
  - (C) The Permittee shall record the results of each inspection, calibration, and validation check of the gas temperature monitor.
  - (D) The Permittee shall maintain the gas temperature monitor at all times and have available necessary parts for routine repairs of the monitoring equipment.
  - (E) The Permittee shall operate the gas temperature monitor and collect emission capture system and add-on control device parameter data at all times that a controlled coating operation is operating, except during monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, if applicable, calibration checks and required zero and span adjustments).
  - (F) The Permittee shall not use emission capture system or add-on control device parameter data recorded during monitoring malfunctions, associated repairs, out of control periods, or required quality assurance or control activities when calculating data averages. You must use all the data collected during all other periods in calculating the data averages for determining compliance with the emission capture system and add-on control device operating limits.
  - (G) A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the gas temperature monitor to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions. Any period for which the monitoring system is out of control and data are not available for required calculations is a deviation from the monitoring requirements.
- (2) Capture system bypass line. The Permittee shall meet the requirements of paragraph (b)(2)(A) or (B) of this section for each emission capture system that contains bypass lines that could divert emissions away from the add-on control device to the atmosphere.
- (A) Properly install, maintain, and operate a flow indicator that takes a reading at least once every 15 minutes. The flow indicator shall be installed at the entrance to any bypass line.
  - (B) Secure the bypass line valve in the nondiverting position with a car-seal or lock-and-key type configuration. A visual inspection of the seal or closure mechanism shall be performed at least once every month to ensure the valve is maintained in the nondiverting position, and the vent stream is not diverted through the bypass line.
- (3) The Permittee shall meet the requirements in paragraphs (b)(3) (A) through (B) of this section for each gas temperature monitoring device.

- (A) Locate the temperature sensor in a position that provides a representative temperature.
  - (B) Use a temperature sensor with a minimum accuracy of  $\pm 1.2$  degrees Celsius or  $\pm 1$  percent of the temperature value in degrees Celsius, whichever is larger.
- (c) The three (3) boilers have visible emissions requirements as specified below:
- (1) Visible emission notations of the three (3) boilers stack exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere and burning fuel oil. A trained employee shall record whether emissions are normal or abnormal.
  - (2) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
  - (3) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
  - (4) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
  - (5) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan – Preparation, Implementation Records and Reports shall be considered a deviation from this permit.

A determination of noncompliance pursuant to any of the methods specified in (a) or (b) above shall not be refuted by evidence of compliance pursuant to the other method.

These monitoring conditions are necessary because the catalytic oxidizers must operate properly to ensure compliance with 326 IAC 8-2-9 (Miscellaneous Metal Coating), 326 IAC 2-7 (Part 70) and 40 CFR Part 64.

## **Conclusion**

The operation of this stationary fabrication of metals products plant shall be subject to the conditions of this Part 70 permit 177-17668-00001.

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

**Addendum to the  
Technical Support Document (TSD) for a Part 70 Operating Permit Renewal**

**Source Background and Description**

**Source Name:** Silgan Closures, LLC  
**Source Location:** 1701 Williamsburg Pike, Richmond, Indiana 47375  
**County:** Wayne  
**SIC Code:** 3466, 3469, and 3559  
**Operation Permit No.:** T177-17668-00001  
**Permit Reviewer:** RT / EVP

On June 5, 2004, the Office of Air Quality (OAQ) had a notice published in Palladium Item in Richmond, Indiana, stating that Silgan Closures, LLC had applied for Part 70 Operating Permit Renewal for the operation of stationary metal products fabrication plant. The notice also stated that OAQ proposed to issue a Part 70 Operating Permit Renewal for this operation and provided information on how the public could review the proposed Part 70 Operating Permit Renewal 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 Part 70 Operating Permit Renewal should be issued as proposed.

Upon further review, the OAQ has decided to make the following changes to the Part 70 Operating Permit renewal. Bolded language has been added and the language with a line through it has been deleted.

**Revision 1**

**Changes Resulting from Ozone 8-hour County Attainment Status Designations:**

On April 15, 2004, the United States Environmental Protection Agency (U.S. EPA) named 23 Indiana counties and one partial county nonattainment for the new 8-hour ozone standard. The designations became effective on June 15, 2004. Wayne county has been designated as attainment for the 8- hour ozone standard. Therefore, no changes to this permit are necessary.

**Revision 2**

Although the TSD itself will not be revised as it is a historical document and the TSD was correct at the time of public notice, the following is being provided to show how the county attainment status has been affected as a result of the 8-hour ozone standard designations. The county attainment status regarding other pollutants remain unchanged; therefore will not be shown below other than in the table.

**County Attainment Status**

The source is located in Wayne County.

Pollutant	Status
PM-10	Attainment
SO <sub>2</sub>	Attainment
NO <sub>2</sub>	Attainment
<b>1-hour Ozone</b>	Attainment
<b>8-hour Ozone</b>	<b>Attainment</b>
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) ~~are precursors for the formation of ozone~~ and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC emissions and NOx are considered when evaluating the rule applicability relating to ozone. Wayne County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions and NOx were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.

### Revision 3

Condition B.8 has been revised as shown below:

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

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

### Revision 4

Condition B.19 has been revised as shown below:

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

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

(3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

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

and

Evansville EPA  
C.K. Newsome Building  
100 E. Walnut Street  
Suite 100  
Evansville, Indiana 47713

and

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

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

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

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

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

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

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

- (c) **Emission Trades [326 IAC 2-7-20(c)]**  
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) **Alternative Operating Scenarios [326 IAC 2-7-20(d)]**  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM OAQ, Evansville EPA 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.**

#### Revision 5

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

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

#### Revision 6

Condition C.19 has been revised as shown below:

C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

- (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, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) 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.**

**Appendix A: Emission Calculations  
VOC & Particulate from Surface Coating operations**

**Company Name:** Silgan Closures, LLC  
**Address City IN Zip:** 1701 Williamsburg Pike Richmond Indiana 47375  
**Part 70 Permit:** T177-17668-00001  
**Reviewer:** RT/EVP  
**Date:** 01-20-04

**Potential Emissions from Coating Lines# 1 through 4**

Coating Line / Coating Material (or) Solvent	Density Lb/Gal	Weight % Volatile (H2O & Organics)	Wt. % Water	Wt. % Organics	Vol.% Water	Vol.% Non-Vol Solids	Gal of Material (gal/ Unit)	Maximum (Units/ Hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Pounds VOC per gallon of coating less water with controls (85%)	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate potential (ton/yr)	lb VOC /gal solids	Transfer Efficiency	
<b>Emissions from Coating operations</b>																		
Line 1 / 22935	8.10	0.68	0.00	0.68	0.00	0.39	0.00	5400.00	5.48	5.48	0.82	88.70	2128.91	388.53	0.00	14.15	1.00	
Line 2 / 22935	8.10	0.68	0.00	0.68	0.00	0.39	0.00	5400.00	5.48	5.48	0.82	88.70	2128.91	388.53	0.00	14.15	1.00	
Line 3 / 22935	8.10	0.68	0.00	0.68	0.00	0.39	0.00	5400.00	5.48	5.48	0.82	88.70	2128.91	388.53	0.00	14.15	1.00	
Line 4 / 22935	8.10	0.68	0.00	0.68	0.00	0.39	0.00	5400.00	5.48	5.48	0.82	88.70	2128.91	388.53	0.00	14.15	1.00	
<b>Emissions from Solvent operations</b>																		
Line 1/ P.M. Acetate	7.88	1.00	0.00	1.00	0.00	0.00	0.00	5400.00	7.88	7.88	1.18	1.74	41.87	7.64	0.00	7.88	1.00	
Line 2/ P.M. Acetate	7.88	1.00	0.00	1.00	0.00	0.00	0.00	5400.00	7.88	7.88	1.18	2.17	52.08	9.51	0.00	7.88	1.00	
Line 3/ P.M. Acetate	7.88	1.00	0.00	1.00	0.00	0.00	0.00	5400.00	7.88	7.88	1.18	2.34	56.17	10.25	0.00	7.88	1.00	
Line 4/ P.M. Acetate	7.88	1.00	0.00	1.00	0.00	0.00	0.00	5400.00	7.88	7.88	1.18	2.34	56.17	10.25	0.00	7.88	1.00	
<b>Total Potential Emissions</b>												<b>363.41</b>	<b>8721.95</b>	<b>1591.76</b>	<b>0.00</b>			

\* **NOTE:(1) The 100 % transfer efficiency is because the source uses rollcoat application**  
**(2) These calculations are performed considering the worst case emissions coating materials and solvents used at all the coating lines**  
 METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) \* Weight % Organics) / (1-Volume % water)  
 Pounds of VOC per Gallon Coating = (Density (lb/gal) \* Weight % Organics)  
 Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr)  
 Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (24 hr/day)  
 Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (8760 hr/yr) \* (1 ton/2000 lbs)  
 Particulate Potential Tons per Year = (units/hour) \* (gal/unit) \* (lbs/gal) \* (1- Weight % Volatiles) \* (1-Transfer efficiency) \*(8760 hrs/yr) \*(1 ton/2000 lbs)  
 Pounds VOC per Gallon of Solids = (Density (lbs/gal) \* Weight % organics) / (Volume % solids)  
 Total = Worst Coating + Sum of all solvents used

**Checking for compliance**  
 The Pounds VOC per gallon of coating less water with controls is 0.83 for coating 22935 and 1.18 for solvent P.M. Acetate  
 Therefore, the coating lines # 1 through 4 comply with the requirements of **326 IAC 8-2-9 (Miscellaneous Metal Coating)**.

**Potential HAP emissions from Coating Lines**

**Company Name:** Silgan Closures, LLC  
**Address City IN Zip:** 1701 Williamsburg Pike Richmond Indiana 47375  
**Part 70 Permit:** T177-17668-00001  
**Reviewer:** RT/EVP  
**Date:** 01-20-04

Coating Line / Coating Material	Density	Gallons of Material	Maximum	Wt %	Wt %	Wt %	Wt %	Wt %	Wt %	Xylene Emissions	MIK Emissions	Benzene Emissions	Cumene Emissions	Glycol Ethers Emissions	Isophorone Emissions	Total
	(Lb/Gal)	(gal/unit)	(unit/hour)	Xylene	MIK	ethyl Benzene	Cumene	Glycol Ethers	isophorone	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	
Line 1 / 27964A	7.75	0.003000	6300.00	3.02%	12.59%	0.78%	1.45%	4.06%	10.83%	19.38	80.77	5.00	9.30	26.05	69.48	209.98
Line 2 / 27964A	7.75	0.003000	5100.00	3.02%	12.59%	0.78%	1.45%	4.06%	10.83%	15.68	65.39	4.05	7.53	21.09	56.25	169.99
Line 3 / 27964A	7.75	0.003000	4680	3.02%	12.59%	0.78%	1.45%	4.06%	10.83%	14.39	60.00	3.72	6.91	19.35	51.61	155.99
Line 4 / 27964A	7.75	0.003000	4680	3.02%	12.59%	0.78%	1.45%	4.06%	10.83%	14.39	60.00	3.72	6.91	19.35	51.61	155.99

Total State Potential Emissions **63.85 266.16 16.49 30.65 85.83 228.96 691.94**

**\* NOTE:(1) These calculations are performed considering the worst case HAP emissions coating materials used at all the coating lines**

**THODOLOGY**

HAPS emission rate (tons/yr) = Density (lb/gal) \* Gal of Material (gal/unit) \* Maximum (unit/hr) \* Weight % HAP \* 8760 hrs/yr \* 1 ton/2000 lbs

**Appendix A: Emission Calculations  
VOC & Particulate from Plastisol**

**Company Name:** Silgan Closures, LLC  
**Address City IN Zip:** 1701 Williamsburg Pike Richmond Indiana 47375  
**Part 70 Permit:** T177-17668-00001  
**Reviewer:** RT/EVP  
**Date:** 01-20-04

**ESTIMATED ANNUAL EMISSIONS FROM COMPOUND CURING PRESS LINE - 58 Lug**

**1/19/04 RLF**

**58Lug Line**

Closure Size	M Caps / Year	Lbs Compound / M Caps	Annual Compound Usage (Lbs)	Annual Lbs VOC Emissions	Annual Lbs TSP Emissions	Annual Production Days	Daily Compound Usage (Lbs)	Daily Lbs VOC Emissions	VOC Emissions (tons/ year)	Daily Lbs TSP Emissions
<b>58 LUG</b>	<b>4,204,800</b>	<b>2.91</b>	12,235,968	9788.8	37,931.5	<b>250</b>	48,944	39.16	7.15	151.73
			0	0.0	-	<b>250</b>	0	-	-	-
			0	0.0	-	<b>250</b>	0	-	-	-
			0	0.0	-	<b>250</b>	0	-	-	-
			0	0.0	-	<b>250</b>	0	-	-	-
	4,204,800		12,235,968	9,789	37,932		48,944	39.16	7.15	151.73

**\* Note: M caps indicates 1000 caps**

Lbs VOC/ Lb Compound Cured Emissions Rate (based on Galson Testing at White Cap, LLC - 402)	<b>0.0008</b>
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Lbs TSP / Lbs Compound Cured Emission Rate (based on Galson Testing at White Cap, LLC - 402)	<b>0.0031</b>
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Max line speed is 1000 caps per minute or 525.6 million per year.  
 Average line speed is 750 caps per minute and 182.5 million per year.

## Appendix A: Emissions Calculations

Page 4 of 6 TSD App A

### Potential Emissions from Natural Gas Combustion MM BTU/HR <100

**Company Name:** Silgan Closures, LLC  
**Address City IN Zip:** 1701 Williamsburg Pike Richmond Indiana 47375  
**Part 70 Permit:** T177-17668-00001  
**Reviewer:** RT/EVP  
**Date:** 01-20-04

Heat Input Capacity  
MMBtu/hr

Potential Throughput  
MMCF/yr

31.5

275.9

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.3	1.0	0.1	13.8	0.8	11.6

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

\*\*Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

#### Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

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

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

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

See page 2 for HAPs emissions calculations.

**Appendix A: Emissions Calculations**

***Natural Gas Combustion Only  
MM BTU/HR <100  
Small Industrial Boiler  
HAPs Emissions***

**Company Name:** Silgan Closures, LLC  
**Address City IN Zip:** 1701 Williamsburg Pike Richmond Indiana 47375  
**Part 70 Permit:** T177-17668-00001  
**Reviewer:** RT/EVP  
**Date:** 01-20-04

HAPs - Organics

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	2.897E-04	1.656E-04	1.035E-02	2.483E-01	4.691E-04

HAPs - Metals

	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	6.899E-05	1.518E-04	1.932E-04	5.243E-05	2.897E-04

Methodology is the same as page 1.

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

**Appendix A: Emission Calculations**

**Potential Emissions from Entire source (Coating lines+ Plastisol+ Nat. Gas Combustion)**

**Company Name:** Silgan Closures, LLC  
**Address City IN Zip:** 1701 Williamsburg Pike Richmond Indiana 47375  
**Part 70 Permit:** T177-17668-00001  
**Reviewer:** RT/EVP  
**Date:** 01-20-04

<b>Emission Unit</b>	<b>PM</b>	<b>PM-10</b>	<b>SO2</b>	<b>NOx</b>	<b>VOC</b>	<b>CO</b>	<b>Single</b>	<b>HAPS</b>
	<b>(tons / yr)</b>	<b>HAP</b>	<b>(tons / yr)</b>					
Coating Lines	0	0	0	0	1591.76	0	228.9 (Isophorone)	691.94
Plastisol	3.46	3.46	0	0	0.9	0	0	0
Nat. Gas Boiler	0.3	1	0.1	13.8	0.8	11.6	negligible	0.165
<b>Total</b>	3.76	4.46	0.1	13.8	1593.455	11.6		692.105