



Joseph E. Kernan  
Governor

Lori F. Kaplan  
Commissioner

October 7, 2004

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

TO: Interested Parties / Applicant  
RE: MonoSol, LLC / 127-18251-00100  
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 OFFICE OF AIR QUALITY

**MonoSol, LLC  
1701 County Line Road  
Portage, Indiana 46368**

(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.: T127-18251-00100	
Issued by: Original signed by Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: October 7, 2004  Expiration Date: October 7, 2009

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## SECTION A SOURCE SUMMARY

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

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

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The Permittee owns and operates a stationary polyvinyl alcohol (PVOH) manufacturing plant.

Responsible Official:	Vice President/General Manager
Source Address:	1701 County Line Road, Portage, Indiana 46368
Mailing Address:	1701 County Line Road, Portage, Indiana 46368
General Source Phone Number:	(219) 762-3165
SIC Code:	3081
County Location:	Porter
Source Location Status:	Nonattainment for ozone Attainment for all other criteria pollutants
Source Status:	Part 70 Permit Program Major Source under Emission Offset Minor Source under PSD Major Source, Section 112 of the Clean Air Act Not in 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) Two (2) bulk resin storage silos (identified as Silo #1 and #2), each with a maximum storage capacity of 59,000 pounds and a maximum off loading rate of 32,000 pounds per hour, controlled by bin vent filters and exhausting at stacks 691 and 692. Construction of these units was completed in 1980.
- (b) One (1) bulk resin storage silo (identified as Silo #3), with a maximum storage capacity of 71,000 pounds and a maximum off loading rate of 32,000 pounds per hour, controlled by bin vent filters and exhausting at stacks 693 and 694. Construction of this unit was completed in 2002.
- (c) Two (2) weigh hopper systems (identified as system 1 and 2), each with a maximum storage capacity of 2,000 pounds and a maximum throughput rate of 22,000 pounds per hour, controlled by fabric filters and exhausting at stacks 679, 198, and 690. System 1 and 2 were constructed in 1998 and 2002, respectively.
- (d) Six (6) film casting lines consisting of twelve (12) drying ovens and six (6) mixers. Each mixer has a maximum storage capacity of 1,000 gallons and a maximum throughput rate of 313 pounds of polyvinyl alcohol resin per hour. Mixer 1 was constructed in 1995; mixer 2 was constructed in 1998; mixers 3 through 5 were constructed in 2001; and mixer 6 was constructed in 2002.
- (e) Twenty-nine (29) hold/run tanks (identified as Tanks #1 through #29). Tanks #1 through #21 each have a maximum capacity of 900 gallons, while Tanks #22 through #29 each have a maximum capacity of 1,300 gallons. Tanks #1 through #7 were installed in 1953; tanks #8 through #13 were installed in 1965; tank #14 was installed in 1967; tanks #15 through #18 were installed in 2001; tanks #19 through #21 were installed in 1967; tanks

#22 through #25 were installed in 2001; and tanks #26 through #29 were installed in 2002.

- (f) Nine (9) bulk organic liquid storage tanks, consisting of the following:
- (1) TEG Tanks 1 and 2, each with a maximum storage capacity of 6,400 gallons, storing triethylene glycol and exhausting to an overflow/spill tank. These units were installed in 1965.
  - (2) PEG 200 Tanks 1 and 2, each with a maximum storage capacity of 6,400 gallons, storing polyethylene glycol-200 MW and exhausting to an overflow/spill tank. These units were installed in 1965.
  - (3) PEG 300 Tank 1, with a maximum storage capacity of 6,400 gallons, storing polyethylene glycol-300 MW and exhausting to an overflow/spill tank. This unit was installed in 1965.
  - (4) Glycerine Tanks 1 and 2, each with a maximum storage capacity of 6,400 gallons and exhausting to an overflow/spill tank. These units were installed in 1965.
  - (5) Kosher Glycerine Tanks 1 and 2, each with a maximum storage capacity of 6,400 gallons and exhausting to an overflow/spill tank. These units were installed in 1965.

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) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million BTU per hour [326 IAC 2-7-1(21)(G)(I)(AA)(aa)], consisting of:
- Two (2) natural gas-fired boilers (identified as EU1 and EU2), each with a maximum heat input capacity of 8.36 MMBtu per hour, and exhausting at stacks ID 682 and 681. These units were installed in 2001 [326 IAC 6-2][40 CFR Part 63, Subpart DDDDD].
- (b) Paved and unpaved roads and parking lots with public access. [326 IAC 2-7-1(21)(xiii)] [326 IAC 6-4].

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]**

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]**

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]**

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)]**

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)]**

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

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

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

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

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

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

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (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. The initial certification shall

cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 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]

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:
    - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
    - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
    - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

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

The PMP extension notification does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

- (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, and Northwest Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

IDEM

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

Northwest Regional Office

Phone: 1-888-209-8892 or 219-757-0265  
Fax: 219-757-0267

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

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, 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]

- (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]

- (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.

**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]

- (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.
- (b) 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]

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 units vented to the control equipment is are 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 Pressure Gauge and 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 pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ( 2%) of full scale reading.

(b) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or 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 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]**

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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.14 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]**

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(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, upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and 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.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

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

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

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

**C.16 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) In accordance with the compliance schedule specified in 326 IAC 2-6-3(b)(1), the Permittee shall submit by July 1 an emission statement covering the previous calendar years as follows:
- (1) Starting in 2004 and every three (3) years thereafter, and;
  - (2) Any year not already required under (1) if the source emits volatile organic compounds or oxides of nitrogen into the ambient air at levels equal to or greater than twenty-five (25) tons during the previous calendar year.
- (b) 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 all pollutants listed in 326 IAC 2-6-4(a);
  - (2) Indicate estimated actual emissions of regulated pollutants (as defined by 326 IAC 2-7-1 (32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

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

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-1.1-1(1).

- (c) 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.17 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.18 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) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

### **Stratospheric Ozone Protection**

#### **C.19 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) Two (2) bulk resin storage silos (identified as Silo #1 and # 2), each with a maximum storage capacity of 59,000 pounds and a maximum off loading rate of 32,000 pounds per hour, controlled by bin vent filters and exhausting at stacks 691 and 692. Construction of these units was completed in 1980.
- (b) One (1) bulk resin storage silo (identified as Silo #3), with a maximum storage capacity of 71,000 pounds and a maximum off loading rate of 32,000 pounds per hour, controlled by bin vent filters and exhausting at stacks 693 and 694. Construction of this unit was completed in 2002.
- (c) Two (2) weigh hopper systems (identified as system 1 and 2), each with a maximum storage capacity of 2,000 pounds and a maximum throughput rate of 22,000 pounds per hour, controlled by fabric filters and exhausting at stacks 679, 198, and 690. System 1 and 2 were constructed in 1998 and 2002, respectively.

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

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

**D.1.1 Particulate [326 IAC 6-3-2]**

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emissions shall not exceed the pounds per hour limit as shown below:

Emission Units	Process Weight		Particulate Emission Limit (pound per hour)
	(pound per hour)	(ton per hour)	
Each of the three (3) resin silos	32,000	16.0	26.3
Each of the two (2) weigh hopper systems	20,000	10.0	19.2

The pounds per hour limitation was calculated using the following equation:

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

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour;  
 and P = process weight rate in tons per hour

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

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

**Compliance Determination Requirements**

**D.1.3 Particulate Control**

In order to comply with D.1.1, the bin vent filters and fabric filters for particulate control shall be in operation and control emissions from the three (3) resin silos and two (2) weigh hoppers at all times that the three (3) resin silos and two (2) weigh hoppers are in operation.

## **Compliance Monitoring Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]**

### **D.1.4 Visible Emissions Notations**

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- (a) Visible emission notations of the two (2) weigh hoppers and three (3) resin silos stack exhausts shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan – Preparation, Implementation, Records and Reports shall be considered a deviation from this permit.

### **D.1.5 Parametric Monitoring**

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The Permittee shall record the total static pressure drop across the fabric filters and bin vent filters used in conjunction with the two (2) weigh hoppers and three (3) resin silos, at least once per shift when the process is in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse (bin vent filter) is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan – Preparation, Implementation, Records and Reports shall be considered a deviation from this permit.

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

### **D.1.6 Baghouse (Fabric Filters and Bin Vent Filters) Inspections**

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An inspection shall be performed each calendar quarter of all bags controlling the two (2) weigh hoppers and three (3) resin silos when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

### **D.1.7 Broken or Failed Bag Detection**

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In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit. If operations continue after bag

failure is observed and it will be ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

- (b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

#### **D.1.8 Record Keeping Requirements**

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- (a) To document compliance with Condition D.1.4, the Permittee shall maintain records of visible emission notations of the two (2) weigh hoppers and three (3) resin silos stack exhausts once per shift.
- (b) To document compliance with Condition D.1.5, the Permittee shall maintain records once per shift of the total static pressure drop during normal operation when venting to the atmosphere.
- (c) To document compliance with Condition D.1.6, the Permittee shall maintain records of the results of the inspections required under Condition D.1.6.
- (d) To document compliance with Condition D.1.2, the Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**SECTION D.2**

**FACILITY OPERATION CONDITIONS**

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

- (f) Nine (9) bulk organic liquid storage tanks, consisting of the following:
- (1) TEG Tanks 1 and 2, each with a maximum storage capacity of 6,400 gallons, storing triethylene glycol and exhausting to an overfill/spill tank. These units were installed in 1965.
  - (2) PEG 200 Tanks 1 and 2, each with a maximum storage capacity of 6,400 gallons, storing polyethylene glycol-200 MW and exhausting to an overfill/spill tank. These units were installed in 1965.
  - (3) PEG 300 Tank 1, with a maximum storage capacity of 6,400 gallons, storing polyethylene glycol-300 MW and exhausting to an overfill/spill tank. This unit was installed in 1965.
  - (4) Glycerine Tanks 1 and 2, each with a maximum storage capacity of 6,400 gallons and exhausting to an overfill/spill tank. These units were installed in 1965.
  - (5) Kosher Glycerine Tanks 1 and 2, each with a maximum storage capacity of 6,400 gallons and exhausting to an overfill/spill tank. These units were installed in 1965.

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

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

**D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-9-1]**

Pursuant to 326 IAC 8-9-1 (Volatile Organic Liquid Storage Vessels), the Permittee shall maintain a record and submit to the department a report containing the following information for nine (9) bulk organic storage tanks and the overflow/spill tank.

- (1) The vessel identification;
- (2) The vessel dimensions; and
- (3) The vessel capacity.

## SECTION D.3 FACILITY OPERATION CONDITIONS

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

#### Insignificant Activities

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million BTU per hour [326 IAC 2-7-1(21)(G)(I)(AA)(aa)], consisting of:

Two (2) natural gas-fired boilers (identified as EU1 and EU2), each with a maximum heat input capacity of 8.36 MMBtu per hour, and exhausting at stacks ID 682 and 681. These units were installed in 2001 [326 IAC 6-2][40 CFR Part 63, Subpart DDDDD].

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

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

#### D.3.1 General Provisions Relating to NESHAP [326 IAC 20-1][40 CFR Part 63, Subpart A]

The provisions of 40 CFR 63 Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the affected source, 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.3.2 National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters [40 CFR Part 63, Subpart DDDDD]

The two (2) natural gas-fired boilers are subject to the requirements of the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63, Subpart DDDDD. The two (2) natural gas-fired boilers are part of the affected source for the small gaseous fuel subcategory, as defined by 40 CFR 63.7575 because they each have a rated capacity of less than or equal to 10 million British thermal units per hour heat input. However, pursuant to 40 CFR 63.7506(c), there are no applicable requirements from 40 CFR 63, Subpart DDDDD and 40 CFR 63, Subpart A for the affected source for the small gaseous fuel subcategory.

#### D.3.3 Particulate [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4(a)(Particulate Emission Limitations for Sources of Indirect Heating) the PM emissions from the 8.36 MMBtu per hour natural gas-fired boilers, which were existing and in operation after September 21, 1983 shall each be limited to 0.52 pounds per MMBtu heat input.

This limitation is based on the following equation:

$$P_t = \frac{1.09}{Q^{0.26}}$$

where,

Pt = emission rate limit (lbs. per MMBtu)

Q = total source heat input capacity rating in MMBtu per hour  
(16.72 MMBtu per hour)

## SECTION D.4 FACILITY OPERATION CONDITIONS

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

- (d) Six (6) film casting lines consisting of twelve (12) drying ovens and six (6) mixers. Each mixer has a maximum storage capacity of 1,000 gallons and a maximum throughput rate of 313 pounds of polyvinyl alcohol resin per hour. Mixer 1 was constructed in 1995; mixer 2 was constructed in 1998; mixers 3 through 5 were constructed in 2001; and mixer 6 was constructed in 2002.
- (e) Twenty-nine (29) hold/run tanks (identified as Tanks #1 through #29). Tanks #1 through #21 each have a maximum capacity of 900 gallons, while Tanks #22 through #29 each have a maximum capacity of 1,300 gallons. Tanks #1 through #7 were installed in 1953; tanks #8 through #13 were installed in 1965; tank #14 was installed in 1967; tanks #15 through #18 were installed in 2001; tanks #19 through #21 were installed in 1967; tanks #22 through #25 were installed in 2001; and tanks #26 through #29 were installed in 2002.

### Insignificant Activities

- (b) Paved and unpaved roads and parking lots with public access. [326 IAC 2-7-1(21)(xiii)] [326 IAC 6-4].

(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)]

There are no applicable State or Federal regulations that apply to these emission units.

## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

### PART 70 OPERATING PERMIT CERTIFICATION

Source Name: MonoSol, LLC  
Source Address: 1701 County Line Road, Portage, Indiana 46368  
Mailing Address: 1701 County Line Road, Portage, Indiana 46368  
Part 70 Permit No.: T127-18251-00100

**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: MonoSol, LLC  
Source Address: 1701 County Line Road, Portage, Indiana 46368  
Mailing Address: 1701 County Line Road, Portage, Indiana 46368  
Part 70 Permit No.: T127-18251-00100

**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  
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: MonoSol, LLC  
Source Address: 1701 County Line Road, Portage, Indiana 46368  
Mailing Address: 1701 County Line Road, Portage, Indiana 46368  
Part 70 Permit No.: T127-18251-00100

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 (specify permit condition #)</b>	
<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 (specify permit condition #)</b>	
<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 (specify permit condition #)</b>	
<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

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

#### Source Background and Description

Source Name: MonoSol, LLC  
 Source Location: 1701 County Line Road, Portage, Indiana 46368  
 County: Porter  
 SIC Code: 3081  
 Operation Permit No.: 127-18251-00100  
 Permit Reviewer: ERG/SD

On June 30, 2004 the Indiana Department of Environmental Management (IDEM) and Office of Air Quality (OAQ) had a notice published in the Chesterton Tribune, Chesterton, Indiana, stating that MonoSol, LLC had applied for a Part 70 Operating Permit to operate a stationary polyvinyl alcohol (PVOH) manufacturing plant. The notice also stated that IDEM, OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

IDEM, OAQ has decided to make the following revisions to the permit. Deleted text is shown as ~~strikeout~~ and new text is shown as **bold**. The Table of Contents has been updated as necessary.

1. In the source address and mailing address under Section A.1, the city name has been corrected from "Portgagge" to "Portage".

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

---

The Permittee owns and operates a stationary polyvinyl alcohol (PVOH) manufacturing plant.

Responsible Official:	Vice President/General Manager
Source Address:	1701 County Line Road, Portgagge, Indiana 46368
Mailing Address:	1701 County Line Road, Portgagge, Indiana 46368
General Source Phone Number:	(219) 762-3165
SIC Code:	3081
County Location:	Porter
Source Location Status:	Nonattainment for ozone Attainment for all other criteria pollutants
Source Status:	Part 70 Permit Program Major Source under Emission Offset Minor Source under PSD Major Source, Section 112 of the Clean Air Act Not in 1 of 28 Source Categories

2. The last sentence of item (d) in Section A.2 has been corrected from "mixer 3 through 5 was..." to "mixers 3 through 5 were...". The facility description (d) included in Section D.4 has been corrected so that it agrees with the description shown below:

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

---

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

....

- (d) Six (6) film casting lines consisting of twelve (12) drying ovens and six (6) mixers. Each mixer has a maximum storage capacity of 1,000 gallons and a maximum throughput rate of 313 pounds of polyvinyl alcohol resin per hour. Mixer 1 was constructed in 1995; mixer 2 was constructed in 1998; mixers 3 through 5 ~~was~~**were** constructed in 2001; and mixer 6 was constructed in 2002.

**SECTION D.4 FACILITY OPERATION CONDITIONS**

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

- (d) Six (6) film casting lines consisting of twelve (12) drying ovens and six (6) mixers. Each mixer has a maximum storage capacity of 1,000 gallons and a maximum throughput rate of 313 pounds of polyvinyl alcohol resin per hour. Mixer 1 was constructed in 1995; mixer 2 was constructed in 1998; mixers 3 through 5 ~~was~~**were** constructed in 2001; and mixer 6 was constructed in 2002.

.....

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

- 3. Item (e) in Section A.2 has been corrected as shown below. The facility description (e) included in Section D.4 has been corrected so that it agrees with the description shown below:

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

---

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

....

- (e) Twenty-nine (29) hold/run tanks (identified as Tanks #1 through #~~24~~**29**). Tanks #1 through #21 each have a maximum capacity of 900 gallons, while Tanks #22 through #29 each have a maximum capacity of 1,300 gallons. Tanks #1 through #7 were installed in 1953; tanks #8 through #13 were installed in 1965; ~~and~~ tank #14 was installed in 1967; tanks #15 through #18 were installed in 2001; tanks #19 through #21 were installed in 1967; tanks #22 through #25 were installed in 2001; and tanks #26 through #29 were installed in 2002.

## SECTION D.4 FACILITY OPERATION CONDITIONS

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

....

- (e) Twenty-nine (29) hold/run tanks (identified as Tanks #1 through #249). Tanks #1 through #21 each have a maximum capacity of 900 gallons, while Tanks #22 through #29 each have a maximum capacity of 1,300 gallons. Tanks #1 through #7 were installed in 1953; tanks #8 through #13 were installed in 1965; and tank #14 was installed in 1967; tanks #15 through #18 were installed in 2001; tanks #19 through #21 were installed in 1967; tanks #22 through #25 were installed in 2001; and tanks #26 through #29 were installed in 2002.

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

4. Item (f) in Section A.2 has been corrected as shown below. The facility description (f) included in Section D.2 has been corrected so that it agrees with the description shown below:

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

---

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

- (f) Nine (9) bulk organic liquid storage tanks, consisting of the following:
- (1) TEG Tanks 1 and 2, each with a maximum storage capacity of 6,400 gallons, storing triethylene glycol and exhausting to an overflow/spill tank. These units were installed in 1965.
  - (2) PEG 200 Tanks 1 and 2, each with a maximum storage capacity of 6,400 gallons, storing polyethylene glycol-200 MW and exhausting to an overflow/spill tank. These units were installed in 1965.
  - (3) PEG 300 Tank 1, with a maximum storage capacity of 6,400 gallons, storing polyethylene glycol-300 MW and exhausting to an overflow/spill tank. This unit was installed in 1965.
  - (4) Glycerine Tanks 1 and 2, each with a maximum storage capacity of 6,400 gallons and exhausting to an overflow/spill tank. These units were installed in 1965.
  - (5) Kosher Glycerine Tanks 1 and 2, each with a maximum storage capacity of 6,400 gallons and exhausting to an overflow/spill tank. These units were installed in 1965.

**SECTION D.2**

**FACILITY OPERATION CONDITIONS**

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

- (f) Nine (9) bulk organic liquid storage tanks, consisting of the following:
  - (1) TEG Tanks 1 and 2, each with a maximum storage capacity of 6,400 gallons, storing triethylene glycol and exhausting to an overflow/spill tank. These units were installed in 1965.
  - (2) PEG 200 Tanks 1 and 2, each with a maximum storage capacity of 6,400 gallons, storing polyethylene glycol-200 MW and exhausting to an overflow/spill tank. These units were installed in 1965.
  - (3) PEG 300 Tank 1, with a maximum storage capacity of 6,400 gallons, storing polyethylene glycol-300 MW and exhausting to an overflow/spill tank. This unit was installed in 1965.
  - (4) Glycerine Tanks 1 and 2, each with a maximum storage capacity of 6,400 gallons and exhausting to an overflow/spill tank. These units were installed in 1965.
  - (5) Kosher Glycerine Tanks 1 and 2, each with a maximum storage capacity of 6,400 gallons and exhausting to an overflow/spill tank. These units were installed in 1965.

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

- 5. The NESHAP citation in item (a) in Section A.3 has been corrected from “40 CFR Part 63, Subpart DDDD” to “40 CFR Part 63, Subpart DDDDD.” The facility description (a), an insignificant activity, (included in Section D.3) has been corrected so that it agrees with the description shown below:

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

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million BTU per hour [326 IAC 2-7-1(21)(G)(I)(AA)(aa)], consisting of:
  - (4) Two (2) natural gas-fired boilers (identified as EU1 and EU2), each with a maximum heat input capacity of 8.36 MMBtu per hour, and exhausting at stacks ID 682 and 681. These units were installed in 2001 [326 IAC 6-2][40 CFR Part 63, Subpart DDDDD].

**SECTION D.3**

**FACILITY OPERATION CONDITIONS**

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

**Insignificant Activities**

(a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million BTU per hour [326 IAC 2-7-1(21)(G)(I)(AA)(aa)], consisting of:

(+) Two (2) natural gas-fired boilers (identified as EU1 and EU2), each with a maximum heat input capacity of 8.36 MMBtu per hour, and exhausting at stacks ID 682 and 681. These units were installed in 2001 **[326 IAC 6-2][40 CFR Part 63, Subpart DDDDD]**.

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

6. Conditions listed under C.16 (Emission Statement) were numbered incorrectly and have been corrected as shown below:

C.16 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]

....

(ba) The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

....

(cb) 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.

7. The first sentence in item (c) under C.18 (General Reporting Requirements) has been corrected from "... any notice, report, or other..." to "any notice, report, or other..."

C.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

....

(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.

....

8. Condition D.1.4 (a) (Visible Emission Notations) has been corrected from "and three (3) resin silos stack exhaust shall be performed..." to "and three (3) resin silos stack exhausts shall be performed...". For clarification purposes, Condition D.1.8 (a) was also corrected so it agrees with the correction shown in D.1.4(a)

D.1.4 Visible Emissions Notations

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- (a) Visible emission notations of the two (2) weigh hoppers and three (3) resin silos stack exhausts shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

....

D.1.8 Record Keeping Requirements

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- (a) To document compliance with Condition D.1.4, the Permittee shall maintain records of visible emission notations of the two (2) weigh hoppers and three (3) resin silos stack exhausts once per shift.

....

9. For clarification purposes, item (b), an insignificant activity under Section A.3, was added to Section D.4.

**SECTION D.4 FACILITY OPERATION CONDITIONS**

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

- (d) Six (6) film casting lines consisting of twelve (12) drying ovens and six (6) mixers. Each mixer has a maximum storage capacity of 1,000 gallons and a maximum throughput rate of 313 pounds of polyvinyl alcohol resin per hour. Mixer 1 was constructed in 1995; mixer 2 was constructed in 1998; mixers 3 through 5 ~~was~~ were constructed in 2001; and mixer 6 was constructed in 2002.
- (e) Twenty-nine (29) hold/run tanks (identified as Tanks #1 through #29). Tanks #1 through #21 each have a maximum capacity of 900 gallons, while Tanks #22 through #29 each have a maximum capacity of 1,300 gallons. Tanks #1 through #7 were installed in 1953; tanks #8 through #13 were installed in 1965; and tank #14 was installed in 1967; tanks #15 through #18 were installed in 2001; tanks #19 through #21 were installed in 1967; tanks #22 through #25 were installed in 2001; and tanks #26 through #29 were installed in 2002.

**Insignificant Activities**

- (b) **Paved and unpaved roads and parking lots with public access. [326 IAC 2-7-1(21)(xiii)] [326 IAC 6-4].**

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

# Indiana Department of Environmental Management Office of Air Quality

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

### Source Background and Description

Source Name:	MonoSol, LLC
Source Location:	1701 County Line Road, Portage, Indiana 46368
County:	Porter
SIC Code:	3081
Operation Permit No.:	127-18251-00100
Permit Reviewer:	ERG/SD

The Office of Air Quality (OAQ) has reviewed a Part 70 Operating Permit application from MonoSol, LLC relating to the operation of a polyvinyl alcohol (PVOH) film manufacturing plant.

### Permitted Emission Units and Pollution Control Equipment

The source does not have any permitted emission units and pollution control devices.

### Unpermitted Emission Units and Pollution Control Equipment

The source consists of the following unpermitted emission units:

- (a) Two (2) bulk resin storage silos (identified as Silo #1 and # 2), each with a maximum storage capacity of 59,000 pounds and a maximum off loading rate of 32,000 pounds per hour, controlled by bin vent filters and exhausting at stacks 691 and 692. Construction of these units was completed in 1980.
- (b) One (1) bulk resin storage silo (identified as Silo #3), with a maximum storage capacity of 71,000 pounds and a maximum off loading rate of 32,000 pounds per hour, controlled by bin vent filters and exhausting at stacks 693 and 694. Construction of this unit was completed in 2002.
- (c) Two (2) weigh hopper systems (identified as system 1 and 2), each with a maximum storage capacity of 2,000 pounds and a maximum throughput rate of 22,000 pounds per hour, controlled by fabric filters and exhausting at stacks 679, 198, and 690. System 1 and 2 were constructed in 1998 and 2002, respectively.
- (d) Six (6) film casting lines consisting of twelve (12) drying ovens and six (6) mixers. Each mixer has a maximum storage capacity of 1,000 gallons and a maximum throughput rate of 313 pounds of polyvinyl alcohol resin per hour. Mixer 1 was constructed in 1995; mixer 2 was constructed in 1998; mixer 3 through 5 was constructed in 2001; and mixer 6 was constructed in 2002.
- (e) Twenty-nine (29) hold/run tanks (identified as Tank #1 through #21). Tanks #1 through #21 each have a maximum capacity of 900 gallons, while Tanks #22 through #29 each have a maximum capacity of 1,300 gallons. Tanks #1 through #7 were installed in 1953; tanks #8 through #13 were installed in 1965; and tank #14 was installed in 1967; tanks #15 through #18 were installed in 2001; tanks #19 through #21 were installed in 1967; tanks #22 through #25 were installed in 2001; and tanks #26 through #29 were installed in 2002.

- (f) Nine (9) bulk organic liquid storage tanks, consisting of the following:
- (1) TEG Tank 1 and 2, each with a maximum storage capacity of 6,400 gallons, storing triethylene glycol and exhausting to an overflow/spill tank. These units were installed in 1965.
  - (2) PEG 200 Tank 1 and 2, each with a maximum storage capacity of 6,400 gallons, storing polyethylene glycol-200 MW and exhausting to an overflow/spill tank. These units were installed in 1965.
  - (3) PEG 300 Tank 1, with a maximum storage capacity of 6,400 gallons, storing polyethylene glycol-300 MW and exhausting to an overflow/spill tank. These units were installed in 1965.
  - (4) Glycerine Tank 1 and 2, each with a maximum storage capacity of 6,400 gallons and exhausting to an overflow/spill tank. These units were installed in 1965.
  - (5) Kosher Glycerine Tank 1 and 2, each with a maximum storage capacity of 6,400 gallons and exhausting to an overflow/spill tank. These units were installed in 1965.

### Insignificant Activities

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million BTU per hour [326 IAC 2-7-1(21)(G)(I)(AA)(aa)], consisting of:
- (1) Two (2) natural gas-fired boilers (identified as EU1 and EU2), each with a maximum heat input capacity of 8.36 MMBtu per hour, and exhausting at stacks ID 682 and 681. These units were installed in 2001 [326 IAC 6-2] [40 CFR 63, Subpart DDDD].
  - (2) Twelve (12) natural gas-fired drying ovens used in conjunction with the six film casting lines, each with a maximum heat input of 1.7 MMBtu per hour, and exhausting at stacks 564, 575, 551, 579, 568, 578, 645, 627, 686, 685, 688, and 687. Four (4) drying ovens were installed in 1953; four (4) were installed in 1963, two (2) in 2001; and two (2) in 2002.
- (b) Paved and unpaved roads and parking lots with public access. [326 IAC 2-7-1(21)(xiii)] [326 IAC 6-4].
- (c) One (1) drum loading area, with a maximum loading throughput rate of 55 gallons.

### Existing Approvals

The source does not have any previous approvals.

### Enforcement Issue

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

## 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 application for the purposes of this review was received on October 17, 2003.

## Emission Calculations

See Appendix A of this document for detailed emission calculations (Appendix A, pages 1 through 8).

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

Pollutant	Potential to Emit (tons/year)
PM	107
PM10	107
SO <sub>2</sub>	0.10
VOC	53.1
CO	13.7
NO <sub>x</sub>	16.3

HAPs	Potential to Emit (tons/year)
Methanol	52.2
Benzene	3.41E-04
Dichlorobenzene	1.95E-04
Formaldehyde	1.22E-02
Hexane	2.93E-01
Toluene	5.53E-04
Total	52.4

- (a) The potential to emit as defined in 326 IAC 2-1.1-1(16) of VOC is equal to or greater than 25 tons per year. Since this source is located in Porter County, it is subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-1.1-1(16)) 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. 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 and Emission Offset applicability.

### Actual Emissions

No previous emission data has been received from the source.

### County Attainment Status

The source is located in Porter County.

Pollutant	Status
PM10	Attainment
SO <sub>2</sub>	Unclassifiable
NO <sub>2</sub>	Attainment
Ozone	Severe Non-Attainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Porter County has been designated as nonattainment for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.
- (b) Porter County has been classified as attainment for all other pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) Fugitive Emissions  
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 or 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

### Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

- (a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.
- (b) Monitoring and related record keeping requirements which assure that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

### Federal Rule Applicability

- (a) Although constructed after June 9, 1989, the two (2) natural gas-fired boilers (identified as EU1 and EU2) are not subject to the New Source Performance Standard, 40 CFR 60, Subpart Dc - Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units (326 IAC 12) because they each have a maximum heat input capacity less than ten (10) MMBtu per hour.
- (b) The two (2) natural gas-fired boilers are subject to the requirements of the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63, Subpart DDDDD. The two (2) natural gas-fired boilers are part of the affected source for the small gaseous fuel subcategory, as defined by 40 CFR 63.7575 because they each have a rated capacity of

less than or equal to 10 million British thermal units per hour heat input. However, pursuant to 40 CFR 63.7506(c), there are no applicable requirements from 40 CFR 63, Subpart DDDDD and 40 CFR 63, Subpart A for the affected source for the small gaseous fuel subcategory.

- (c) The nine (9) bulk organic storage tanks, the hold/run tanks #1 through #14 and the hold/run tanks #19 through #21 are not subject to the New Source Performance Standard (NSPS), 40 CFR 60, Subpart Kb – (as revised in October 2003) Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for which Construction, Reconstruction, or Modification Commenced After July 23, 1984, because they were constructed before the applicability date of this rule and the maximum capacities of the storage tanks are all less than 75 cubic meters (19,813 gallons).
- (d) Although constructed after the July 23, 1984 applicability date for this rule, the hold/run tanks #15 through #18 and tanks #22 through #29 are not subject to the New Source Performance Standard (NSPS), 40 CFR 60, Subpart Kb (as revised October 2003) – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for which Construction, Reconstruction, or Modification Commenced After July 23, 1984, because the maximum capacities of the storage tanks are all less than 75 cubic meters (19,813 gallons).

There are no other New Source Performance Standards (NSPS) (40 CFR Part 60) applicable to this source.

- (e) This source is not subject to the requirements of 40 CFR 63, Subpart J - National Emission Standards for Hazardous Air Pollutants for Polyvinyl Chloride and Copolymers Production because this source does not produce polyvinyl chloride and copolymers. The source manufactures polyvinyl alcohol films.
- (f) This source is not subject to the requirements of 40 CFR 61, Subpart F – National Emission Standard for Vinyl Chloride (326 IAC 14) because this source does not produce vinyl chloride or polymerized vinyl chloride. The source manufactures polyvinyl alcohol films.

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

- (g) This source does not involve a pollutant-specific emissions unit as defined in 40 CFR 64.1.
  - (1) with the potential to emit before controls equal to or greater than the major source threshold.
  - (2) that is subject to an emission limitation or standard.
  - (3) uses a control device as defined in 40 CFR 64.1 to comply with that emission limitation or standard.

Therefore, the requirements of 40 CFR Part 64, Compliance Assurance Monitoring, are not applicable to this source.

### **State Rule Applicability – Entire Source**

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

The source began operations prior to August 7, 1977 and is not in one (1) of twenty-eight (28) source categories. The source has been modified several times. At construction, the source had a potential to emit for all criteria pollutants that was less than the PSD major source threshold of 250 tons per year, and modifications undertaken since the initial construction have not increased the potential to emit to greater than 250 tons per year.

Therefore, this source is an existing minor source under PSD and is not subject to the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)).

#### 326 IAC 2-3 (Emission Offset)

This source is located in Porter County, which has been classified as a severe non-attainment area for ozone. As described previously in this document, volatile organic compounds (VOCs) are used as an indicator for ozone emissions. The source was constructed prior to 1977 and has been modified several times, none of which triggered emission offset applicability. The construction of film cast line 5 in 2001 and film cast line 6, which were independent projects, each had a potential to emit of VOC equal to 8.23 tons per year and did not trigger the emission offset rule. The VOC emissions increases over the last 5 years are less than the de minimis levels of 25 tons per year. Therefore, the requirements of 326 IAC 2-3 (Emission Offset) do not apply. However, the source is a major source under 326 IAC 2-3 because the potential to emit of VOC from the entire source is greater than twenty-five (25) tons per year.

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

Since this source is required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program, this source is subject to 326 IAC 2-6 (Emission Reporting). In accordance with the compliance schedule in 326 IAC 2-6-3, an emission statement must be submitted triennially by July 1 beginning in 2004 and every 3 years thereafter. This source which is located in Porter County also has potential to emit greater than or equal to 25 tons of VOC per year. Therefore, an emission statement covering the previous calendar year must be submitted by July 1 of any year that the source is not already required to submit a statement if the source emits VOC into the ambient air at levels equal to or greater than 25 tons per year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

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

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary 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))

All major sources of HAPs were constructed prior to July 27, 1997 applicability date for this rule, except for two (2) film cast lines (identified as line 5 and line 6), each having a potential to emit of single HAP equal to 8.23 tons per year. Line 5 was constructed to keep up with the market demand in November 2000 while construction of line 6 was commissioned in October 2001 for maintenance and upkeep of other existing film cast lines. The two (2) film cast lines are considered as independent projects. Therefore, the requirements of 326 IAC 2-4.1 are not applicable to this source.

#### 326 IAC 8-6-1 (Organic Solvent Emission Limitations)

This source is not subject to the requirements of 326 IAC 8-6 because although operations at this source commenced operation after October 7, 1974 and prior to January 1, 1980, the potential to emit VOC is less than 100 tons per year.

### **State Rule Applicability – Six (6) Film Cast Lines**

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

Although the polyvinyl alcohol (PVOH) film cast lines were all constructed after January 1, 1980 applicability date for this rule, the potential emissions of VOC from each of these units are less

than twenty-five (25) tons per year. Therefore, the provisions of 326 IAC 8-1-6 are not applicable to these emission units.

### State Rule Applicability – Resin Silos, Weigh Hopper Systems

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

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing processes), the particulate emissions from the resin silos and weigh hopper systems area shall not exceed the pound per hour emission rates shown in the following table:

Emission Units	Process Weight		Particulate Emission Limit (pounds per hour)
	(pound per hour)	(ton per hour)	
Each of the three (3) resin silos	32,000	16.0	26.3
Each of the two (2) Weigh hopper systems	20,000	10.0	19.2

The pounds per hour limitations were calculated using the following equation:

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

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

Based on the potential to emit calculations for the source (Appendix A), the bin vent filters and fabric filters shall be in operation at all times that three (3) resin silos and two (2) weigh hoppers are in operation to show compliance with this rule.

### State Rule Applicability - Organic Liquid Storage Tanks

#### 326 IAC 12 (New Source Performance Standards)

Pursuant to 326 IAC 12 and 326 IAC 1-1-3, storage tanks which store organic liquids must be reviewed pursuant to the July 1, 2000 version of 40 CFR Part 60, Subpart Kb. The ten (10) bulk organic storage tanks and hold/run tanks #1 through #14 were constructed prior to July 23, 1984, applicability date for this rule. Therefore, they are not subject to the provisions of 326 IAC 12. The hold/run tanks #15 through #29, although constructed after July 23, 1989, each have a maximum capacity less than 40 cubic meters (10,567 gallons). Therefore, they are not subject to the provisions of 326 IAC 12.

#### 326 IAC 8-9 (Volatile Organic Liquid Storage Vessels)

The nine (9) storage tanks are subject to 326 IAC 8-9 because they are located in Porter County. Since the storage capacity of each tank is less than 39,000 gallons, the source is subject only to the recordkeeping and reporting requirement in 326 IAC 8-9-6(b). The Permittee shall maintain a record and submit to the department a report containing the following information:

- (1) The vessel identification;
- (2) The vessel dimensions; and
- (3) The vessel capacity.

### State Rule Applicability – Two (2) Boilers

#### 326 IAC 6-2-4(a) (Particulate Emissions Limitations for Sources of Indirect Heating)

Pursuant to 326 IAC 6-2-4(a), the PM emissions from the 8.36 MMBtu per hour natural gas-fired boilers, which were existing and in operation after September 21, 1983 shall be each limited to 0.52 pounds per MMBtu heat input.

This limitation is based on the following equation:

$$Pt = \frac{1.09}{Q^{0.26}}$$

where,

Pt = emission rate limit (lbs. per MMBtu)

Q = total source heat input capacity rating in MMBtu per hour  
(16.72 MMBtu per hour)

### State Rule Applicability – Natural Gas-Fired Combustion Units (Other than boilers)

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

The twelve (12) natural gas-fired drying ovens are not subject to the requirements of 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) because particulate emissions from these units are from combustion only.

### Testing Requirements

Testing is not required for any of the VOC/HAP emitting sources because the emission units are not subject to any VOC/HAP rules. However, if testing is required by IDEM, OAQ, the Permittee shall perform VOC/HAP testing for the facilities utilizing methods as approved by the Commissioner.

### 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 the source is as follows:

The two (2) weigh hoppers and three (3) resin silos have the applicable compliance monitoring conditions as specified below:

- (a) Visible Emissions Notations

- (1) Visible emission notations of the two (2) weigh hoppers and three (3) resin silos stack exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (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.

(b) Parametric Monitoring

The Permittee shall record the total static pressure drop across the fabric filters and bin vent filters used in conjunction with the two (2) weigh hoppers and three (3) resin silos, at least once per shift when the process is in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse (bin vent filter) is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan – Preparation, Implementation, Records and Reports shall be considered a deviation from this permit.

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

(c) Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the two (2) weigh hoppers and three (3) resin silos when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

(d) In the event that bag failure has been observed:

- (1) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for

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

- (2) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

These monitoring conditions are necessary because the control devices (bin vent filters and fabric filters) for the weigh hoppers and three (3) resin silos must operate properly to ensure compliance with 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes).

## **Conclusion**

The operation of this polyvinyl alcohol (PVOM) film manufacturing plant shall be subject to the conditions of this Part 70 permit T127-18251-00100.

**Appendix A: Emission Calculations  
Natural Gas Combustion Only  
Two (2) Boilers**

**Company Name:** MonoSol, LLC  
**Address:** 1701 County Line Road, Portage, Indiana 46368  
**Title V:** 127-18251  
**Plt ID:** 127-00100  
**Reviewer:** ERG/SD  
**Date:** May 26, 2004

Total Heat Input Capacity  
MMBtu/hour

Potential Throughput  
MMCF/year

16.7 (2 Units total)

146

**Pollutant**

	* PM	* PM10	SO <sub>2</sub>	** NO <sub>x</sub>	VOC	CO
Emission Factor (lb/MMCF)	7.6	7.6	0.6	100	5.5	84.0
Potential To Emit (tons/year)	0.56	0.56	0.04	7.32	0.40	6.15

\*PM and PM10 emission factors are filterable and condensable PM and PM10 combined.

\*\*Emission factor for NO<sub>x</sub>: Uncontrolled = 100 lb/MMCF.

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

**METHODOLOGY**

Potential Throughput (MMCF/year) = Heat input capacity (MMBtu/hr) \* 8760 hours/year \* 1 MMCF/1000 MMBtu

Potential To Emit (tons/year) = Potential throughput (MMCF/year) \* Emission factor (lb/MMCF) \* 1 ton/2000 lbs

See next page for HAPs emissions calculations.

**Appendix A: Emission Calculations  
Natural Gas Combustion Only  
Two (2) Boilers**

**Company Name:** MonoSol, LLC

**Address:** 1701 County Line Road, Portage, Indiana 46368

**Title V:** 127-18251

**Pit ID:** 127-00100

**Reviewer:** ERG/SD

**Date:** May 26, 2004

**HAPs - Organics**

Emission Factor (lb/MMCF)	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential To Emit (tons/year)	1.54E-04	8.79E-05	5.49E-03	1.32E-01	2.49E-04

**HAPs - Metals**

Emission Factor (lb/MMCF)	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential To Emit (tons/year)	3.66E-05	8.06E-05	1.03E-04	2.78E-05	1.54E-04

Methodology is the same as previous page.

The five highest organic and metal HAPs emission factors as provided above are from AP-42, Chapter 1.4, Table 1-4.2, 1.4-3 and 1.4-4 (July, 1998). Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Appendix A: Emission Calculations  
Natural Gas Combustion Only  
Twelve (12) Drying Ovens**

**Company Name:** MonoSol, LLC  
**Address:** 1701 County Line Road, Portage, Indiana 46368  
**Title V:** 127-18251  
**Plt ID:** 127-00100  
**Reviewer:** ERG/SD  
**Date:** May 26, 2004

Total Heat Input Capacity  
MMBtu/hour

20.4 (12 Units total)

Potential Throughput  
MMCF/year

179

	Pollutant					
	* PM	* PM10	SO <sub>2</sub>	** NO <sub>x</sub>	VOC	CO
Emission Factor (lb/MMCF)	7.6	7.6	0.6	100	5.5	84.0
Potential To Emit (tons/year)	0.68	0.68	0.05	8.94	0.49	7.51

\*PM and PM10 emission factors are filterable and condensible PM and PM10 combined.

\*\*Emission factor for NO<sub>x</sub>: Uncontrolled = 100 lb/MMCF.

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

**METHODOLOGY**

Potential Throughput (MMCF/year) = Heat input capacity (MMBtu/hr) \* 8760 hours/year \* 1 MMCF/1000 MMBtu

Potential To Emit (tons/year) = Potential throughput (MMCF/year) \* Emission factor (lb/MMCF) \* 1 ton/2000 lbs

See next page for HAPs emissions calculations.

**Appendix A: Emission Calculations  
Natural Gas Combustion Only  
Twelve (12) Drying Ovens**

**Company Name:** MonoSol, LLC

**Address:** 1701 County Line Road, Portage, Indiana 46368

**Title V:** 127-18251

**Pit ID:** 127-00100

**Reviewer:** ERG/SD

**Date:** May 26, 2004

**HAPs - Organics**

Emission Factor (lb/MMCF)	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential To Emit (tons/year)	1.88E-04	1.07E-04	6.70E-03	1.61E-01	3.04E-04

**HAPs - Metals**

Emission Factor (lb/MMCF)	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential To Emit (tons/year)	4.47E-05	9.83E-05	1.25E-04	3.40E-05	1.88E-04

Methodology is the same as previous page.

The five highest organic and metal HAPs emission factors as provided above are from AP-42, Chapter 1.4, Table 1-4.2, 1.4-3 and 1.4-4 (July, 1998). Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Appendix A: Emission Calculations  
PM/PM10 Emissions  
From Weigh Hopper Systems 1 and 2**

**Company Name:** MonoSol, LLC  
**Address:** 1701 County Line Road, Portage, Indiana 46368  
**Title V:** 127-18251  
**Plt ID:** 127-00100  
**Reviewer:** ERG/SD  
**Date:** May 26, 2004

Emission Unit	Max. Throughput Rate (lbs/hour)	* Emission Factor (lb/ton)	Controlled PTE of PM/PM10 (lbs/hour)	Controlled PTE of PM/PM10 (tons/year)	Control Efficiency %	Uncontrolled PTE of PM/PM10 (tons/year)	Uncontrolled PTE of PM/PM10 per weigh hopper (lbs/hour)	** Particulate Emission Limit per weigh hopper (lbs/hour)
Weigh Hoppers	40000	0.007	1.4E-01	6.1E-01	99%	61.3	7.00	19.2

**TOTAL**

Assume all PM emissions are equal to PM10.

Control = Fabric filters with 99 % efficiency

\* Emission factor is from AP-42, Chapter 11.26 (Talc Processing), Table 11.26-1 SCC 3-05-089-85 (November, 1995).

\*\* Particulate emission limit was determined using the Process Weight Rule (326 IAC 6-3-2).

**METHODOLOGY**

Controlled PTE of PM/PM10 (lbs/hour) = Max. Throughput Rate of Resin (lbs/hour) \* Emission Factor (lb/ton) \* 1 ton/2000 lbs

Controlled PTE of PM/PM10 (tons/year) = Max.Throughput Rate of Resin (lbs/hour) \* Emission Factor (lb/ton) \* 1 ton/2000 lbs \* 8760 hours/year \* 1 ton/2000 lbs

Uncontrolled PTE of PM/PM10 (tons/year) =Controlled PTE of PM/PM10 (tons/year) \* 1/(1 - Control Efficiency %)

Uncontrolled PTE of PM/PM10 (lbs/hour) = Max. Throughput Rate of Resin (lbs/hour) \* Emission Factor (lb/ton) \* 1 ton/2000 lbs \* 1/(1 - Control Efficiency %)

**Appendix A: Emission Calculations  
PM/PM10 Emissions  
From Three (3) Bulk PVOH Resin Silos**

**Company Name:** MonoSol, LLC  
**Address:** 1701 County Line Road, Portage, Indiana 46368  
**Title V:** 127-18251  
**Plt ID:** 127-00100  
**Reviewer:** ERG/SD  
**Date:** May 26, 2004

Emission Unit	Max. Throughput Rate (lbs/hour)	* Emission Factor (lb/ton)	Controlled PTE of PM/PM10 (lbs/hour)	Controlled PTE of PM/PM10 (tons/year)	Control Efficiency %	Uncontrolled PTE of PM/PM10 (tons/year)	Uncontrolled PTE of PM/PM10 per silo (lbs/hour)	** Particulate Emission Limit per silo (lbs/hour)
PVOH Resin Silos	96000	0.0007	0.034	0.147	99%	44.2	3.36	26.3

**TOTAL**

Assume all PM emissions are equal to PM10.

Control = Bin vent filters with 99 % efficiency

\* There are no emission factors available for PVOH resin handling. Therefore, worst case emission factor from AP-42, Chapter 11.26 (Talc Processing), Table 11.26-1 SCC 3-05-089-85 (November 1995) was used by assuming only 10% of PM/PM10 was emitted during truck to silo off load rate.

\*\* Particulate emission limit was determined using the Process Weight Rule (326 IAC 6-3-2).

**METHODOLOGY**

Controlled PTE of PM/PM10 (lbs/hour) = Max. Throughput Rate of Resin (lbs/hour) \* Emission Factor (lb/ton) \* 1 ton/2000 lbs

Controlled PTE of PM/PM10 (tons/year) = Max. Throughput Rate of Resin (lbs/hour) \* Emission Factor (lb/ton) \* 1 ton/2000 lbs \* 8760 hours/year \* 1 ton/2000 lbs

Uncontrolled PTE of PM/PM10 (tons/year) = Controlled PTE of PM/PM10 (tons/year) \* 1/(1 - Control Efficiency %)

Uncontrolled PTE of PM/PM10 (lbs/hour) = Max. Throughput Rate of Resin (lbs/hour) \* Emission Factor (lb/ton) \* 1 ton/2000 lbs \* 1/(1 - Control Efficiency %)

**Appendix A: Emissions Calculations  
VOC and HAP Emissions  
Film Cast Lines 1 through 6 and Six (6) Mixers**

**Company Name:** MonoSol, LLC  
**Address:** 1701 County Line Road, Portage, Indiana 46368  
**Title V:** 127-18251  
**Plt ID:** 127-00100  
**Reviewer:** ERG/SD  
**Date:** May 26, 2004

**POTENTIAL TO EMIT VOC/HAP FROM DRYER OVENS USED IN CONJUNCTION WITH THE 6 FILM CAST LINES**

* Material	Max. Throughput Rate (lb/hour)	Weight % VOC/Methanol	PTE of VOC/Methanol (lbs/hour)	PTE of VOC/Methanol (tons/year)
M1030	1878	0.60%	11.3	49.4
<b>TOTAL</b>				<b>49.4</b>

- 1/ VOC emissions result from the drying of the PVOH film solution and volatization of the free methanol contained in the solution.
- 2/ Material used for the calculation above represents the worse case scenario in terms of VOC/HAP emissions because it has the highest solution/resin consumption rate of all the products.

**METHODOLOGY**

PTE of VOC/Methanol (ton/year) = Max. throughput rate (lb/hour) \* Weight % VOC/Methanol \* 8760 hours/year \* 1 ton/2000 lbs

**POTENTIAL TO EMIT VOC/HAP FROM MIXERS**

** Material	Max. No of Batches/Line (batch/line-year)	* Emission Rate VOC (lb/batch)	* Emission Rate HAP (lb/batch)	PTE of VOC (tons/ year)	PTE of HAP (tons/ year)
M8534 Schold's	1669	0.0926	0.0512	0.08	0.043
<b>TOTAL</b>				<b>0.08</b>	<b>0.043</b>

- 1/ VOC emissions result from the liquid organic materials contained in the batch material. The mixers mixes and heats the liquid plasticizers.
- 2/ Emission rate of VOC and HAP were determined by the source using Ideal Gas Law principles.
- 3/ Material used for the calculation above represents the worse case scenario in terms of VOC/HAP emissions

**METHODOLOGY**

PTE (tons/year) = Max. no of batches per line per year \* Emission rate (lb/batch) \* 1 ton/2000 lbs

**Appendix A: Emissions Calculations  
Summary**

**Company Name:** MonoSol, LLC

**Address:** 1701 County Line Road, Portage, Indiana 46368

**Title V:** 127-18251

**Plt ID:** 127-00100

**Reviewer:** ERG/SD

**Date:** May 26, 2004

**POTENTIAL TO EMIT OF CRITERIA POLLUTANTS IN TONS PER YEAR**

<b>Emission Units</b>	<b>PM</b>	<b>PM10</b>	<b>SO<sub>2</sub></b>	<b>NO<sub>x</sub></b>	<b>VOC</b>	<b>CO</b>	<b>* Single Highest HAP</b>
2 Boilers	0.56	0.56	0.04	7.32	0.40	6.15	
12 Drying Ovens	0.68	0.68	0.05	8.94	0.49	7.51	
2 Weigh Hoppers	61.3	61.3					
3 Resin Silos	44.2	44.2					
6 Film Cast Lines (Dryer Ovens)					49.4		49.4
6 Mixers					0.08		0.043
* 29 Hold/Run Tanks					2.12		2.12
* 9 VOL Storage Tanks					0.64		0.64
<b>Total</b>	107	107	0.10	16.3	53.1	13.7	52.2

\* Methanol

\* The potential to emit VOC from 9 VOL storage tanks and 29 hold/run tanks were calculated by the Permittee using EPA TANKS 4.0 model.