

**PART 70 OPERATING PERMIT RENEWAL
OFFICE OF AIR QUALITY
and
INDIANAPOLIS OFFICE OF ENVIRONMENTAL
SERVICES**

**Engineered Polymer Solutions, Inc. d/b/a Valspar Coatings
546 West Abbott Street
Indianapolis, Indiana 46225**

(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.: T097-18308-00040	
Issued by:	Issuance Date: May 12, 2004
ORIGINALLY SIGNED BY	Expiration Date: May 12, 2004
Janet G. McCabe, Assistant Commissioner Office of Air Quality	
ORIGINALLY SIGNED BY	
John B. Chavez, Administrator Office of Environmental Services	

TABLE OF CONTENTS

A SOURCE SUMMARY

- A.1 General Information [326 IAC 2-7-4(c)][326 IAC 2-7-5(15)][326 IAC 2-7-1(22)]
- A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]
[326 IAC 2-7-5(15)]
- A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-7-4(c)] [326
IAC 2-7-5(15)]
- A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

B GENERAL CONDITIONS

- B.1 Definitions [326 IAC 2-7-1]
- B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5]
- B.3 Enforceability [326 IAC 2-7-7]
- B.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]
- B.5 Severability [326 IAC 2-7-5(5)]
- B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]
- B.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]
- B.8 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]
- B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]
- 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]
- B.11 Emergency Provisions [326 IAC 2-7-16]
- B.12 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]
- B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]
- B.14 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]
- 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]
- B.16 Permit Renewal [326 IAC 2-7-4]
- B.17 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12]
- B.18 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)]
[326 IAC 2-7-12 (b)(2)]
- B.19 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]
- B.20 Source Modification Requirement [326 IAC 2-7-10.5]
- B.21 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]
- B.22 Transfer of Ownership or Operational Control [326 IAC 2-7-11]
- B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]

C SOURCE OPERATION CONDITIONS

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]
- C.2 Opacity [326 IAC 5-1]
- C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]
- C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]
- C.5 Fugitive Dust Emissions [326 IAC 6-4]
- C.6 Operation of Equipment [326 IAC 2-7-6(6)]
- C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

Testing Requirements [326 IAC 2-7-6(1)]

- C.8 Performance Testing [326 IAC 3-6]

Compliance Requirements [326 IAC 2-1.1-11]

- C.9 Compliance Requirements [326 IAC 2-1.1-11]

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

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]
- C.14 Compliance Response Plan - Preparation, Implementation, Records, and Reports
[326 IAC 2-7-5] [326 IAC 2-7-6]
- C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
[326 IAC 2-7-6]

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]
- C.17 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]
- C.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

Stratospheric Ozone Protection

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

D.1 FACILITY OPERATION CONDITIONS - Boilers

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

- D.1.1 Particulate Emission Limitations for Sources of Indirect Heating [326 IAC 6-2-2]
- D.1.2 Sulfur Dioxide Emissions Limitations [326 IAC 7-1.1-2]

Compliance Determination Requirements

- D.1.3 Sulfur Dioxide Emissions and Sulfur Content

Compliance Monitoring Requirements

- D.1.4 Visible Emissions Notations

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

- D.1.5 Record Keeping Requirements
- D.1.6 Reporting Requirements

D.2 FACILITY OPERATION CONDITIONS - CF-1, SB28, EU-17, and Tank Cleaning

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

- D.2.1 Particulate Emission Limitations [326 IAC 6-3-2]
- D.2.2 Hazardous Air Pollutants (HAPs) [326 IAC 20][40 CFR 63]

Compliance Determination Requirements

- D.2.3 Particulate Matter (PM)
- D.2.4 Hazardous Air Pollutants (HAPs)

Compliance Monitoring Requirements

- D.2.5 Visible Emissions Notations
- D.2.6 Parametric Monitoring for the Baghouses
- D.2.7 Baghouse and Filter Inspections
- D.2.8 Broken or Failed Bag Detection

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

- D.2.9 Record Keeping Requirements

D.2.10 Reporting Requirements

D.3 FACILITY OPERATION CONDITIONS - Cold Cleaner Degreaser Operations

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

D.3.1 Cold Cleaner Degreaser Operations and Control [326 IAC 8-3-5]

Certification

Emergency Occurrence Report

Semi-Annual Natural Gas Fired Boiler Certification

Part 70 Semi-Annual Report

Quarterly Deviation and Compliance Monitoring Report

Part 70 Quarterly Report

Part 70 Quarterly Report

SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary coating manufacturing plant.

Responsible Official:	Thomas White
Source Address:	546 West Abbott Street, Indianapolis, Indiana 46225
Mailing Address:	546 West Abbott Street, Indianapolis, Indiana 46225
General Source Phone Number:	(317) 634-8512
SIC Code:	2851
County Location:	Marion
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD; Major Source, Section 112 of the Clean Air Act

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

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

- (a) One (1) Orr & Sembower boiler, identified as emission unit OSB, located in building 30, constructed in 1960, with a maximum heat input capacity of 14.5 million Btu per hour (MMBtu/hr), using natural gas as the primary fuel and distillate oil as a backup fuel, exhausting to stack OSB-S.
- (b) One (1) York Shipley natural gas fired boiler, identified as emission unit YSB, located in building 30, constructed in 1982, with a maximum heat input capacity of 29 million Btu per hour (MMBtu/hr), exhausting to stack YSB-S.
- (c) One (1) Coating Formulation and Packaging Line, identified as CF-1, constructed before 1980 and modified in 2001, with a maximum production rate of 3.0 tons of paint per hour, where paints, lacquer and enamel are formulated and subsequently packaged in tanker trucks, totes, drums and cans. This line consists of the following:
 - (1) Ninety-two (92) mix tanks.
 - (2) Forty-one (41) variable speed air/hydraulic lift dispensers.
 - (3) Twenty-two (22) paint mills.
 - (4) One hundred and sixty-eight (168) portable kettles/tubs.
 - (5) Two (2) single speed air/hydraulic lift dispensers (UFD).
 - (6) Two (2) 3 horsepower (HP) post mixers.

- (7) One (1) letdown tank, with a maximum capacity of 5,000 gallons.
 - (8) One (1) dry ingredient handing process, controlled by fourteen (14) portable baghouses (identified as DC3 through DC16) and two (2) stationary baghouses (identified as DC1 and DC2), exhausting to stacks DC1 through DC16, respectively.
 - (9) Five (5) stationary filling stations, each with a maximum loading rate of 12 gallons per minute.
 - (10) Ten (10) portable filling stations, each with a maximum loading rate of 12 gallons per minute.
- (d) One (1) Tote paint spray booth, identified as emission unit SB28, located in building 28, constructed in 1977, using air atomization as the coating application method to coat metal totes, and using a dry filter to control particulate matter emissions, exhausting to stack SB28-S.
- (e) One (1) Latex Paint Production Line, identified as emission unit EU-17, constructed in 2001 and modified in 2002, with a maximum production rate of 20,000 tons of paint per year, consisting of the following:
- (1) Two (2) raw material storage tanks, constructed in 1999, each with a maximum capacity of 6,000 and 8,000 gallons, respectively.
 - (2) Two (2) emulsion storage tanks, constructed in 2002, each with a maximum capacity of 7,000 gallons.
 - (3) One (1) dispersion mixer, constructed in 2001, with a maximum capacity of 1,800 gallons.
 - (4) One (1) letdown tank, constructed in 2001, with a maximum capacity of 4,500 gallons.
 - (5) One (1) finished goods tank, constructed in 1999, with a maximum capacity of 6,000 gallons.
 - (6) One (1) finished goods tank, constructed in 2001, with a maximum capacity of 8,000 gallons.
 - (7) One (1) raw material loading and dispersion process, controlled by a baghouse, identified as DC17.

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) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6, including the following:
- (1) Cold Cleaning Operations which consist of 30 portable cold cleaning units of various sizes used to clean production and laboratory related tools and small machine parts. These cold cleaning units are charged with reclaim solvent. VOC emissions from these cold cleaning units are emitted to the building. Dirty solvents are sent back to the solvent recovery unit (SRU) and reused.

- (b) Other insignificant emitting activities with potential emissions less than the emissions level specified in 326 IAC 2-7-1(21)(A) through (C)
 - (1) Tank Cleaning Operations involves rinsing and cleaning paint formulation equipment (mixing vats, dispersers, mills, etc.) either manually or by machines with reclaimed organic solvents. The dirty reclaimed solvent is sent back to the Luwa Thin Film Evaporator (Solvent Recovery Unit, SRU) for recovery of the solvents. Volatile Organic Compounds which evaporate during this process are emitted into the room air. This emission unit was existing prior to January 1, 1980.

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

This stationary source has chosen to continue operating under a Part 70 Permit, although it is not required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) for the following reasons:

- (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]

(a) 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 and OES, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

(b) Unless otherwise stated, all terms and conditions in this permit that are local requirements, including any provisions designed to limit the source's potential to emit, are enforceable by OES.

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, and OES within a reasonable time, any information that IDEM, OAQ, and OES 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, and OES 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. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than 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

City of Indianapolis
Office of Environmental Services
2700 South Belmont Avenue
Indianapolis, Indiana 46221

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, and OES 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, and OES may require to determine the compliance status of the source.

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

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

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the PMPs, including any required record keeping as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, and OES upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ, and OES. IDEM, OAQ, and OES 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 OES within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967; and
Telephone Number: 317-327-2234 (ask for Compliance Section)
Facsimile Number: 317-327-2274

- (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

and

City of Indianapolis
Office of Environmental Services
2700 South Belmont Avenue
Indianapolis, Indiana 46221

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, and OES 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, and OES 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, and OES 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, or OES 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, or OES 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

and

City of Indianapolis
Office of Environmental Services
2700 South Belmont Avenue
Indianapolis, Indiana 46221

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, or OES 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, or OES 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, or OES at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, or OES 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, or OES 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

and

City of Indianapolis
Office of Environmental Services
2700 South Belmont Avenue
Indianapolis, Indiana 46221

- (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, and OES on or before the

date it is due.

- (2) If IDEM, OAQ, and OES, 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, and OES, 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, and OES, 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, or OES 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

and

City of Indianapolis
Office of Environmental Services
2700 South Belmont Avenue
Indianapolis, Indiana 46221

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)]

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

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

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

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

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
- (3) The changes do not result in emissions which exceed the 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

City of Indianapolis
Office of Environmental Services
2700 South Belmont Avenue
Indianapolis, Indiana 46221

and

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

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

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

Such records shall consist of all information required to be submitted to IDEM, OAQ, and OES 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]

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]

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, OES, U.S. EPA, or an authorized representative to perform the following:

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

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

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

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

and

City of Indianapolis
Office of Environmental Services
2700 South Belmont Avenue
Indianapolis, Indiana 46221

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, and OES 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, or OES the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, I/M & Billing Section), to determine the appropriate permit fee.

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 thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

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

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

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

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

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

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

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

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

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of

regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

and

City of Indianapolis
Office of Environmental Services
2700 South Belmont Avenue
Indianapolis, Indiana 46221

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

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

The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

- (g) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.8 Performance Testing [326 IAC 3-6]

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

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

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

and

City of Indianapolis
Office of Environmental Services
2700 South Belmont Avenue
Indianapolis, Indiana 46221

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

Compliance Requirements [326 IAC 2-1.1-11]

C.9 Compliance Requirements [326 IAC 2-1.1-11]

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

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

C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

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

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

and

City of Indianapolis
Office of Environmental Services
2700 South Belmont Avenue
Indianapolis, Indiana 46221

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

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

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

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

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

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

- (a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (2%) of full scale reading.
- (b) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge 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]

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]

- (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, and OES 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 and OES 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) Pursuant to 326 IAC 2-6-3(b)(2), starting in 2005 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:
 - (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
 - (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1 (32) (“Regulated pollutant, which is used only for purposes of Section 19 of this rule”) from the source, for purpose of fee assessment.

The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality

100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

And

Indianapolis Office of Environmental Services
2700 South Belmont Avenue
Indianapolis, Indiana 46203

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

- (b) The emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and OES 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 or OES makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or OES 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

and

City of Indianapolis
Office of Environmental Services
2700 South Belmont Avenue
Indianapolis, Indiana 46221

- (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, and OES on or before the date it is due.

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

Stratospheric Ozone Protection

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

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

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

SECTION D.1 FACILITY OPERATION CONDITIONS

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

- (a) One (1) Orr & Sembower boiler, identified as emission unit OSB, located in building 30, constructed in 1960, with a maximum heat input capacity of 14.5 million Btu per hour (MMBtu/hr), using natural gas as the primary fuel and distillate oil as a backup fuel, exhausting to stack OSB-S.
- (b) One (1) York Shipley natural gas fired boiler, identified as emission unit YSB, located in building 30, constructed in 1982, with a maximum heat input capacity of 29 million Btu per hour (MMBtu/hr), exhausting to stack YSB-S.

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

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

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

Pursuant to 326 IAC 6-2-2(a), particulate emissions from emission units OSB and YSB shall be limited to 0.48 pounds per million Btu.

D.1.2 Sulfur Dioxide Emissions Limitations [326 IAC 7-1.1-2]

Pursuant to 326 IAC 7-1.1-2, SO₂ emissions from the dual fired boiler, identified as OSB, are limited to 0.5 pounds per million Btu when combusting distillate oil.

Compliance Determination Requirements

D.1.3 Sulfur Dioxide Emissions and Sulfur Content

Compliance with condition D.1.2 shall be determined utilizing one of the following options:

- (a) Pursuant to 326 IAC 3-3-4, the Permittee shall demonstrate that the fuel oil sulfur content does not exceed five-tenths percent (0.5%) by either:
 - (1) Providing vendor analysis of fuel delivered, if accompanied by a certification; or
 - (2) Analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.
 - (A) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and
 - (B) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling; or
- (b) Compliance may also be determined by conducting a stack test for sulfur dioxide emissions from emission unit OSB using 40 CFR 60, Appendix A, Method 6 in accordance with the procedures in 326 IAC 3-2.1.

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

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

D.1.4 Visible Emissions Notations

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

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

D.1.5 Record Keeping Requirements

- (a) To document compliance with Condition D.1.2, the Permittee shall maintain records in accordance with (1) through (6) below.
 - (1) Calendar dates covered in the compliance determination period;
 - (2) Actual fuel oil usage since last compliance determination period and equivalent sulfur dioxide emissions;
 - (3) A certification, signed by the owner or operator, that the records of the fuel supplier certifications represent all of the fuel combusted during the period; and

If the fuel supplier certification is to demonstrate compliance the following, as a minimum, shall be maintained:

- (4) Fuel supplier certifications;
 - (5) The name of the fuel supplier; and
 - (6) A statement from the fuel supplier that certifies the sulfur content of the fuel oil.
- The Permittee shall retain records of all recording/monitoring data and support information for a period of five (5) years, or longer if specified elsewhere in this permit, from the date of the monitoring sample, measurement, or report. Support information includes all calibration and maintenance records and all original strip-chart recording for continuous monitoring instrumentation, and copies of all reports required by this permit.
- (b) To document compliance with Condition D.1.4, the Permittee shall maintain records of visible emission notations of the boiler exhaust while combusting fuel oil.
 - (c) All records shall be maintained in accordance with Section C – General Reporting

Requirements, of this permit.

D.1.6 Reporting Requirements

A semi-annual summary of the information to document compliance with Condition D.1.2 shall be submitted to the addresses listed in Section C – General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the semi-annual period being reported.

SECTION D.2 FACILITY OPERATION CONDITIONS

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

- (a) One (1) Coating Formulation and Packaging Line, identified as CF-1, constructed before 1980 and modified in 2001, with a maximum production rate of 3.0 tons of paint per hour, where paints, lacquer and enamel are formulated and subsequently packaged in tanker trucks, totes, drums and cans. This line consists of the following:
- (1) Ninety-two (92) mix tanks.
 - (2) Forty-one (41) variable speed air/hydraulic lift dispensers.
 - (3) Twenty-two (22) paint mills.
 - (4) One hundred and sixty-eight (168) portable kettles/tubs.
 - (5) Two (2) single speed air/hydraulic lift dispensers (UFD).
 - (6) Two (2) 3 horsepower (HP) post mixers.
 - (7) One (1) letdown tank, with a maximum capacity of 5,000 gallons.
 - (8) One (1) dry ingredient handing process, controlled by fourteen (14) portable baghouses (identified as DC3 through DC16) and two (2) stationary baghouses (identified as DC1 and DC2), exhausting to stacks DC1 through DC16, respectively.
 - (9) Five (5) stationary filling stations, each with a maximum loading rate of 12 gallons per minute.
 - (10) Ten (10) portable filling stations, each with a maximum loading rate of 12 gallons per minute.
- (b) One (1) Tote paint spray booth, identified as emission unit SB28, located in building 28, constructed in 1977, using air atomization as the coating application method to coat metal totes, and using a dry filter to control particulate emissions, exhausting to stack SB28-S.
- (c) One (1) Latex Paint Production Line, identified as emission unit EU-17, constructed in 2001 and modified in 2002, with a maximum production rate of 20,000 tons of paint per year, consisting of the following:
- (1) Two (2) raw material storage tanks, constructed in 1999, each with a maximum capacity of 6,000 and 8,000 gallons, respectively.
 - (2) Two (2) emulsion storage tanks, constructed in 2002, each with a maximum capacity of 7,000 gallons.
 - (3) One (1) dispersion mixer, constructed in 2001, with a maximum capacity of 1,800 gallons.
 - (4) One (1) letdown tank, constructed in 2001, with a maximum capacity of 4,500 gallons.
 - (5) One (1) finished goods tank, constructed in 1999, with a maximum capacity of 6,000 gallons.

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

- (6) One (1) finished goods tank, constructed in 2001, with a maximum capacity of 8,000 gallons.
- (7) One (1) raw material loading and dispersion process, controlled by a baghouse, identified as DC17.
- (d) Tank Cleaning Operations involves rinsing and cleaning paint formulation equipment (mixing vats, dispersers, mills, etc.) either manually or by machines with reclaimed organic solvents. The dirty reclaimed solvent is sent back to the Luwa Thin Film Evaporator (Solvent Recovery Unit, SRU) for recovery of the solvents. Volatile Organic Compounds which evaporate during this process are emitted into the room air. This emission unit was existing prior to January 1, 1980.

(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 Particulate Emission Limitations [326 IAC 6-3-2]

(a) Pursuant to 326 IAC 6-3-2(d), SB28 shall be controlled by a dry particulate filter. The source shall operate the filter in accordance with manufacturer's specifications. This requirement to operate the control is not federally enforceable.

(b) Pursuant to 326 IAC 6-3-2(e), the particulate emissions for CF-1 shall be limited by the following equation:

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

The process weight rate for CF-1 is 3.32 tons per hour. Therefore, the allowable rate of emissions for CF-1 is 9.16 pounds per hour, which is equivalent to 40 tons per year.

(c) Pursuant to 326 IAC 6-3-2(e), the particulate emissions for EU-17 shall be limited by the following equation:

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

The process weight rate for is 0.37 tons per hour. Therefore, the allowable rate of emission for EU-17 is 2.1 pounds per hour, which is equivalent to 9.2 tons per year.

D.2.2 Hazardous Air Pollutants (HAPs) [326 IAC 20][40 CFR 63]

Pursuant to Significant Permit Modification, 097-15604-00040, issued on January 29, 2003, combined with the emissions from the insignificant activities, the HAPs emissions from the entire source are limited to less than ten (10) tons per twelve (12) consecutive month period for any single HAP, and less than 25 tons per twelve (12) consecutive month period for any combination of HAPs. Therefore, the requirements of 326 IAC 20 and 40 CFR 63 (NESHAP) are not applicable. The following relevant limits apply:

(a) The emissions of a single HAP from the coating formulation and packaging line (CF-1), and the Tote Spray Booth, SB28, shall not exceed 9.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month. The HAPs emissions shall be calculated with the following equation:

$$E = \Sigma[(U1 \times C_i \times EF1) + (U2 \times C_i) + (U3 \times EF2)]$$

- Where E = A single HAP emissions (tons/month);
U1 = The amount of solvent delivered to CF-1 (tons/month);
U2 = The amount of paint, thinner, and cleaning solvent delivered to paint booths (tons/month);
U3 = The amount of solvents used for tank cleaning process (tons/month);
C_i = The weight percentage of a single volatile HAP in each material, i (%);
EF1 = The HAPs emission factor for each coating category (lbs/lbs);
EF2 = The HAPs emission factor for tank cleaning process (lbs/lbs).

- (b) The emissions of any combination of HAPs from the coating formulation and packaging line (CF-1) shall not exceed 24.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month. The total HAPs emissions equals the summation of all single HAPs emissions calculated by the equation in (a).

Compliance Determination Requirements

D.2.3 Particulate Matter (PM)

Pursuant to 326 IAC 6-3-2, and in order to comply with D.2.1,

- (a) the dry filters for particulate control shall be in operation in accordance with manufacturer's specifications and control emissions from Totes Spray Paint Booth (SB28) at all times when this booth is in operation. This requirement to operate the control is not federally enforceable.
- (b) the two (2) baghouses, identified as DC1 and DC2, for PM control shall be in operation and control emissions from the dry ingredient handling process, identified as DC3-DC16, of the Coating Formulation and Packaging Line, identified as CF-1, at all times that the dry ingredient handling process is in operation;
- (c) the baghouse, identified as DC17, for PM control shall be in operation and control emissions from the raw material loading and dispersion process of the Latex Paint Production Line, identified as EU-17, at all times that the raw material loading and dispersion process is in operation.

D.2.4 Hazardous Air Pollutants (HAPs)

Compliance with the HAP emissions limits in condition D.2.2 shall be determined by one of the following:

- (a) The manufacturer's certified product data sheet;
- (b) The manufacturer's material safety data sheet;
- (c) Sampling and analysis, using any of the following test methods, as applicable:
- (1) 40 CFR 60, Method 24, Appendix A (July 1, 1998), shall be used to measure the total volatile HAP and volatile organic compound (VOC) content of resins and gel coats. Method 24 may be modified for measuring the volatile HAP content of resins or gel coats to require that the procedure be performed on uncatalyzed resin or gel coat samples;
 - (2) 40 CFR 63, Method 311, Appendix A (July 1, 1998), shall be used to measure HAP content in resins and gel coats by direct injection into a gas chromatograph;

- (d) An alternate method approved by IDEM, OAQ, and OES.

Compliance Monitoring Requirements

D.2.5 Visible Emissions Notations

- (a) Visible emission notations of the dry ingredient handling process (CF-1), identified as DC3-DC16, and the raw material loading and dispersion (EU-17) stacks 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.2.6 Parametric Monitoring for the Baghouses

The Permittee shall record the total static pressure drop across the baghouses used in conjunction with the Units EU-17 and CF-1, at least once per shift when the respective process is in operation and venting to the atmosphere. When for any one reading, the pressure drop across any baghouse for EU-17 or CF-1 is outside the normal range of 3 to 6 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 OES and shall be calibrated at least once every six (6) months.

D.2.7 Baghouse and Filter Inspections

An inspection shall be performed each calendar quarter of all bags and filters controlling Units CF-1, SB28, and EU-17 when venting to the atmosphere. All defective bags and filters shall be replaced. Inspections required by this condition shall not be performed in consecutive months.

D.2.8 Broken or Failed Bag Detection

In the event that bag failure has been observed:

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

steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. The eight (8) hour requirement does not apply if operations have been discontinued. 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 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.

- (e) 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 Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.9 Record Keeping Requirements

- (a) To document compliance with Condition D.2.2, the Permittee shall maintain records in accordance with (1) through (6) below:
 - (1) The monthly pounds of coatings processes per coating category.
 - (2) The HAP content of each solvent used for coating manufacturing process. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (3) The monthly weight, and HAP content of each coating material and solvent used in the Tote Spray Paint Booth (SB28).
 - (4) The monthly weight and HAP content of cleanup solvent used in the tank cleaning operation and the monthly HAP emissions from tank cleaning.
 - (5) The total HAP emissions for each month.
 - (6) The weight of VOC and HAP emissions for each compliance period.
- (b) To document compliance with Condition D.2.5, the Permittee shall maintain records of visible emission notations of the stack exhausts for Baghouse DC1, Baghouse DC2, and Baghouse DC17 once per shift.
- (c) To document compliance with Condition D.2.6, the Permittee shall maintain records once per shift of the total static pressure drop during normal operation when venting to the atmosphere.
- (d) To document compliance with Condition D.2.7, the Permittee shall maintain records of the results of the inspections required under Condition D.2.7 and the dates the vents are redirected.
- (e) All records shall be maintained in accordance with Section C - General Record Keeping

Requirements, of this permit.

D.2.10 Record Keeping Requirements

A quarterly summary of the information to document compliance with Condition D.2.2 shall be submitted to the addresses listed in Section C – General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the semi-annual period being reported. The report submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Cold Cleaning Operations which consist of 30 portable cold cleaning units of various sizes used to clean production and laboratory related tools and small machine parts. These cold cleaning units are charged with reclaim solvent. VOC emissions from these cold cleaning units are emitted to the building. Dirty solvents are sent back to the solvent recovery unit (SRU) and reused.

(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 Cold Cleaner Degreaser Operations and Control [326 IAC 8-3-5]

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:
- (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand or foot if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.
 - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
 - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
 - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
 - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.

- (B) A water cover when the solvent which is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:
 - (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
AND
INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES**

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Engineered Polymer Solutions, Inc. d/b/a Valspar Coatings
Source Address: 546 West Abbott Street, Indianapolis, Indiana 46225
Mailing Address: 546 West Abbott Street, Indianapolis, Indiana 46225
Part 70 Permit No.: 097-18308-00040

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Phone:

Date:

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

**COMPLIANCE BRANCH
100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

**and
INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES
2700 S. Belmont Ave.
Indianapolis, Indiana 46221
Phone: 317-327-2363
Fax: 317-327-2274**

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: Engineered Polymer Solutions, Inc. d/b/a Valspar Coatings
Source Address: 546 West Abbott Street, Indianapolis, Indiana 46225
Mailing Address: 546 West Abbott Street, Indianapolis, Indiana 46225
Part 70 Permit No.: 097-18308-00040

This form consists of 2 pages

Page 1 of 2

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

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

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

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

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by:

Title / Position:

Date:

Phone:

A certification is not required for this report.

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

Part 70 Semi-Annual Report

Source Name: Engineered Polymer Solutions, Inc. d/b/a Valspar Coatings
Source Address: 546 West Abbott Street, Indianapolis, Indiana 46225
Mailing Address: 546 W. Abbott Street, Indianapolis Indiana 46225
Part 70 Permit No.: T097-18308-00040
Emission units: Orr & Stembower Boiler (OSB)
Parameter: % Sulfur in Distillate Oil
Limit: 0.5% Sulfur

Months: _____ to _____ Year: _____

Dates fuel oil combusted	Sulfur content of fuel oil combusted as determined by supplier certification or sampling and analysis	Percent sulfur by weight of fuel oil combusted

- 9 No deviation occurred in this quarter.
- 9 Deviation/s occurred in this quarter.
Deviation has been reported on:

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

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

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

Source Name: Engineered Polymer Solutions, Inc. d/b/a Valspar Coatings
Source Address: 546 West Abbott Street, Indianapolis, Indiana 46225
Mailing Address: 546 West Abbott Street, Indianapolis, Indiana 46225
Part 70 Permit No.: 097-18308-00040

<input type="checkbox"/> Natural Gas Only <input type="checkbox"/> Alternate Fuel burned From: _____ To: _____
--

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
Signature:
Printed Name:
Title/Position:
Phone:
Date:

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

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
AND
INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES
PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Engineered Polymer Solutions, Inc. d/b/a Valspar Coatings
Source Address: 546 West Abbott Street, Indianapolis, Indiana 46225
Mailing Address: 546 West Abbott Street, Indianapolis, Indiana 46225
Part 70 Permit No.: 097-18308-00040

Months: _____ to _____ Year: _____

Page 1 of 2

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

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

Form Completed By:

Title/Position:

Date:

Phone:

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

Source Name: Engineered Polymer Solutions, Inc. d/b/a Valspar Coatings
 Source Address: 546 West Abbott Street, Indianapolis, Indiana 46225
 Mailing Address: 546 West Abbott Street, Indianapolis, Indiana 46225
 Part 70 Permit No.: T097-08308-00040
 Facility: CF-1, SB28, and tank cleaning process
 Parameter: A single HAP emission
 Limit: Less than 9.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month using the following equation:

$$E = \sum[(U1 \times C_i \times EF1) + (U2 \times C_i) + (U3 \times EF2)]$$

Where E = A single HAP emissions (tons/month);
 U1 = The amount of solvent delivered to CF-1 (tons/month);
 U2 = The amount of paint, thinner, and cleaning solvent delivered to paint booths (tons/month);
 U3 = The amount of solvents used for tank cleaning process (tons/month);
 C_i = The weight percentage of a single volatile HAP in each material, i (%);
 EF1 = The HAPs emission factor for each coating category (lbs/lbs);
 EF2 = The HAPs emission factor for tank cleaning process (lbs/lbs).

YEAR:

Month	Column 1	Column 2	Column 1 + Column 2
	This Month single HAP emission	Previous 11 Months single HAP emission	12 Month Total single HAP emission
Month 1			
Month 2			
Month 3			

- No deviation occurred in this quarter.
 Deviation/s occurred in this quarter.
 Deviation has been reported on: _____

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

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

Source Name: Engineered Polymer Solutions, Inc. d/b/a Valspar Coatings
 Source Address: 546 West Abbott Street, Indianapolis, Indiana 46225
 Mailing Address: 546 West Abbott Street, Indianapolis, Indiana 46225
 Part 70 Permit No.: T097-08308-00040
 Facility: CF-1, SB28, and tank cleaning process
 Parameter: Total HAP Emissions
 Limit: Less than 24.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month using the following equation:

$$\text{Total HAP Emission} = \sum (\text{A single HAP emission})$$

YEAR:

Month	Column 1	Column 2	Column 1 + Column 2
	This Month Total HAP emission	Previous 11 Months Total HAP emission	12 Month Total Total HAP emission
Month 1			
Month 2			
Month 3			

- No deviation occurred in this quarter.
 Deviation/s occurred in this quarter.
 Deviation has been reported on: _____

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

Attach a signed certification to complete this report.

**Indiana Department of Environmental Management
Office of Air Quality
and
Indianapolis Office of Environmental Services**

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

Source Name: Engineered Polymer Solutions, Inc. d/b/a Valspar Coatings
Source Location: 546 West Abbott Street, Indianapolis, Indiana 46225
County: Marion
SIC Code: 2854
Operation Permit No.: T097-18308-00040
Permit Reviewer: Angelique Oligier

On March 10, 2004, the Office of Air Quality (OAQ) and the Office of Environmental Services (OES) had a notice published in the Indianapolis Star, Indianapolis, Indiana, stating that Engineered Polymer Solutions, Inc. d/b/a Valspar Coatings had applied for a Part 70 Operating Permit Renewal for the operation of a coating manufacturing plant. The notice also stated that OAQ and OES 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.

No comments were received from the Applicant. Upon further review, the OAQ and OES have decided to make the following revisions to the draft Part 70 Operating Permit. The TSD will remain as it originally appeared when published. Changes to the permit or technical support material that occur after the permit has been published are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision. Bolded language has been added, and the language with a line through it has been deleted. The Table Of Contents has been modified to reflect these changes.

Revisions to 326 IAC 2-6 (Emission Reporting) became effective March 27, 2004. Since this source is required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program, this source is subject to 326 IAC 2-6 (Emission Reporting). In accordance with the compliance schedule in 326 IAC 2-6-3, an emission statement must be submitted triennially by July 1 beginning in 2005 and every 3 years after. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4. As a result of the revision to 326 IAC 2-6 (Emission Reporting), the following changes have been made to the permit:

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) **Pursuant to 326 IAC 2-6-3(b)(2), starting in 2005 and every three (3) years thereafter**, the Permittee shall submit **by July 1** an emission statement **covering the previous calendar year**. ~~certified pursuant to the requirements of 326 IAC 2-6. This statement must be received in accordance with the compliance schedule specified in 326 IAC 2-6-3 and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the period identified in 326 IAC 2-6. The emission statement shall meet the following requirements~~ **contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:**

- (1) Indicate estimated actual emissions of **all** pollutants ~~from the source, in compliance with 326 IAC 2-6 (emission Reporting)~~ **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

and

City of Indianapolis
Office of Environmental Services
2700 South Belmont Avenue
Indianapolis, Indiana 46221

The emission statement does require the certification by the responsible official as defined by 326 IAC ~~2-1.1-1(4)~~ **2-7-1(34)**.

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

**Indiana Department of Environmental Management
Office of Air Quality
and
Indianapolis Office of Environmental Services**

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

Source Background and Description

Source Name:	Engineered Polymer Solutions, Inc. d/b/a Valspar Coatings
Source Location:	546 West Abbott Street, Indianapolis, Indiana 46225
County:	Marion
SIC Code:	2851
Operation Permit No.:	097-7789-00040
Operation Permit Issuance Date:	August 31, 1999
Permit Renewal No.:	097-18308-00040
Permit Reviewer:	Angelique Olinger

The Office of Air Quality (OAQ) and the Office of Environmental Services (OES) have reviewed a Part 70 Operating Permit Renewal application from Engineered Polymer Solutions, Inc. d/b/a Valspar Coatings relating to the operation of a coating manufacturing plant.

Permitted Emission Units and Pollution Control Equipment

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

- (a) One (1) Orr & Sembower boiler, identified as emission unit OSB, located in building 30, constructed in 1960, with a maximum heat input capacity of 14.5 million Btu per hour (MMBtu/hr), using natural gas as the primary fuel and distillate oil as a backup fuel, exhausting to stack OSB-S.
- (b) One (1) York Shipley natural gas fired boiler, identified as emission unit YSB, located in building 30, constructed in 1982, with a maximum heat input capacity of 29 million Btu per hour (MMBtu/hr), exhausting to stack YSB-S.
- (c) One (1) Coating Formulation and Packaging Line, identified as CF-1, constructed before 1980 and modified in 2001, with a maximum production rate of 3.0 tons of paint per hour, where paints, lacquer and enamel are formulated and subsequently packaged in tanker trucks, totes, drums and cans. This line consists of the following:
 - (1) Ninety-two (92) mix tanks.
 - (2) Forty-one (41) variable speed air/hydraulic lift dispensers.
 - (3) Twenty-two (22) paint mills.

- (4) One hundred and sixty-eight (168) portable kettles/tubs.
 - (5) Two (2) single speed air/hydraulic lift dispensers (UFD).
 - (6) Two (2) 3 horsepower (HP) post mixers.
 - (7) One (1) letdown tank, with a maximum capacity of 5,000 gallons.
 - (8) One (1) dry ingredient handling process, controlled by fourteen (14) portable baghouses (identified as DC3 through DC16) and two (2) stationary baghouses (identified as DC1 and DC2), exhausting to stacks DC1 through DC16, respectively.
 - (9) Five (5) stationary filling stations, each with a maximum loading rate of 12 gallons per minute.
 - (10) Ten (10) portable filling stations, each with a maximum loading rate of 12 gallons per minute.
- (d) One (1) Tote paint spray booth, identified as emission unit SB28, located in building 28, constructed in 1977, using air atomization as the coating application method to coat metal totes, and using a dry filter to control particulate matter emissions, exhausting to stack SB28-S.
- (e) One (1) Latex Paint Production Line, identified as emission unit EU-17, constructed in 2001 and modified in 2002, with a maximum production rate of 20,000 tons of paint per year, consisting of the following:
- (1) Two (2) raw material storage tanks, constructed in 1999, each with a maximum capacity of 6,000 and 8,000 gallons, respectively.
 - (2) Two (2) emulsion storage tanks, constructed in 2002, each with a maximum capacity of 7,000 gallons.
 - (3) One (1) dispersion mixer, constructed in 2001, with a maximum capacity of 1,800 gallons.
 - (4) One (1) letdown tank, constructed in 2001, with a maximum capacity of 4,500 gallons.
 - (5) One (1) finished goods tank, constructed in 1999, with a maximum capacity of 6,000 gallons.
 - (6) One (1) finished goods tank, constructed in 2001, with a maximum capacity of 8,000 gallons.
 - (7) One (1) raw material loading and dispersion process, controlled by a baghouse, identified as DC17.

Unpermitted Emission Units and Pollution Control Equipment

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

Insignificant Activities

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

- (a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6, including the following:
 - (1) Cold Cleaning Operations which consist of 30 portable cold cleaning units of various sizes used to clean production and laboratory related tools and small machine parts. These cold cleaning units are charged with reclaim solvent. VOC emissions from these cold cleaning units are emitted to the building. Dirty solvents are sent back to the solvent recovery unit (SRU) and reused. [326 IAC 8-3-5]
- (b) Other insignificant emitting activities with potential emissions less than the emissions level specified in 326 IAC 2-7-1(21)(A) through (C)
 - (1) Seven (7) Quality Assurance Paint Booths, over spray is controlled by a dry filter. These emission units are used to test coatings produced at the source. This emission unit was installed prior to January 1, 1980. [326 IAC 6-3-2]
 - (2) One hundred and seventy-four (174) fixed roof, above ground storage tanks ranging in size from 180 to 9,608 gallons. These tanks are used to store solvents, resins, and other raw materials and intermediates. These emission units were installed prior to January 1, 1980.
 - (3) One Luwa Thin Film Evaporator (Solvent Recovery Unit, or SRU), Model #LN0200, used to reclaim solvent from waste materials. This unit is operated under vacuum, typically 28 in. Hg, pulled at the condenser end of the unit. This emission unit was installed prior to January 1, 1987.
 - (4) Tank Cleaning Operations involves rinsing and cleaning paint formulation equipment (mixing vats, dispersers, mills, etc.) either manually or by machines with reclaimed organic solvents. The dirty reclaimed solvent is sent back to the Luwa Thin Film Evaporator (Solvent Recovery Unit, SRU) for recovery of the solvents. Volatile Organic Compounds which evaporate during this process are emitted into the room air. This emission unit was existing prior to January 1, 1980.

Existing Approvals

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

- (a) T097-7789-00040, issued on August 31, 1999;
- (b) First Administrative Amendment, 097-11482-00040, issued on February 16, 2000;
- (c) Second Administrative Amendment, 097-13947-00040, issued on April 20, 2001;
- (d) First Minor Source Modification, 097-14326-00040, issued on May 7, 2001;
- (e) First Minor Permit Modification, 097-14855-00040, issued on August 30, 2001;
- (f) First Part 70 Reopening, 097-13398-00040, issued on March 14, 2002;
- (g) First Significant Permit Modification, 097-15604-00040, issued on January 29, 2003; and

(h) Third Administrative Amendment, 097-17719-00040, issued on August 13, 2003.

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

The following condition from a previous approval has been determined no longer applicable; therefore, was not incorporated into this Part 70 permit:

Condition D.2.1 of First Significant Permit Modification, 097-15604-00040, issued on January 28, 2003, limiting VOC emissions from units CF-1, SB28, OSB, QA1 through QA7, tank cleaning operations, storage tanks, and solvent recovery unit to less than 99 tons per year, pursuant to 326 IAC 8-6. The First Significant Permit Modification, 097-15604-00040, established new emission factors for unit CF-1, and included the removal of several emissions units previously included in this limit. After these modifications, the potential to emit of VOC for the source is less than one hundred (100) tons per year. Therefore, 326 IAC 8-6 no longer applies to the source, and has been removed accordingly.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

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

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

An administratively complete Part 70 permit renewal application for the purposes of this review was received on December 9, 2003.

Emission Calculations

See Appendix A of this document for detailed emission calculations (nine pages).

Potential to Emit of the Source

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

The source was issued a Part 70 Operating Permit on August 31, 1999. The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered enforceable only after issuance of the original Part 70 operating Permit and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/emission unit	Potential to Emit (tons/year)						
	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
OSB	0.89	0.89	31.10	0.18	2.22	8.89	*
YSB	0.24	0.97	0.08	0.70	10.67	12.70	*
CF-1 and EU-17, combined	74.73	74.73	*	25.70	*	*	18.41
SB-28	0.02	0.02	*	0.03	*	*	*
Tanks	*	*	*	1.10	*	*	0.57
Insignificant Activities	*	*	*	1.38	*	*	*
Tanks Clean-up	*	*	*	3.27	*	*	2.99
Total PTE	75.87	76.60	31.17	29.83	12.89	21.59	21.96

- (a) The potential to emit of each air pollutant is less than the Title V thresholds. However, the source prefers to maintain the current permit status (Part 70 permit), instead of transferring the Part 70 Permit to a Minor Source Operating Permit (MSOP).
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is equal to or greater than ten (10) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

Actual Emissions

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

Pollutant	Potential To Emit (tons/year)
PM	0.18
PM-10	0.18
SO ₂	0.01
VOC	28.20
CO	1.32
NO _x	1.57
Single HAP	6.91
Combination of HAPs	15.58

County Attainment Status

The source is located in Marion County.

Pollutant	Status
PM-10	attainment
SO ₂	maintenance attainment
NO ₂	attainment
Ozone	maintenance attainment
CO	attainment
Lead	unclassifiable

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

Part 70 Permit Conditions

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

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

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) applicable to this source.
 - (1) The storage tanks located at this source have capacities of less than forty (40) cubic meters (10,560 gallons). Therefore, the NSPS for Volatile Organic Liquid Storage Vessels for which construction, reconstruction, or modification commenced after July 23, 1984 (40 CFR 60.110b – 117b, Subpart Kb) is not applicable to these units.
 - (2) The boilers, identified as YSB and OSB, were installed prior to June 9, 1989. Therefore, the NSPS for Small Industrial-Commercial-Institutional Steam Generating Units (Subpart Dc) is not applicable to these units.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP)(326 IAC 14, 20 and 40 CFR Part 61, 63) applicable to this source.

(1) The HAPs emissions from the entire source are less than 10 tons per year for a single HAP and less than 25 tons per year for any combination of HAPs. Therefore, the NESHAP for Miscellaneous Coating Manufacturing (40 CFR 63, Subpart FFFF) is not applicable to the source. In addition, pursuant to SPM 097-15604-00040, the Permittee has chosen to limit the HAPs emissions from the entire source to less than the HAP major source thresholds as follows:

(A) The emissions of a single HAP from the coating formulation and packaging line (CF-1), and the Tote Spray Booth, SB28, shall not exceed 9.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month. The HAPs emissions shall be calculated with the following equation:

$$E = \sum[(U1 \times C \times EF1) + (U2 \times C_i) + (U3 \times EF2)]$$

Where E = A single HAP emissions (tons/month);
U1 = The amount of solvent delivered to CF-1 (tons/month);
U2 = The amount of paint, thinner, and cleaning solvent delivered to paint booths (tons/month);
U3 = The amount of solvents used for tank cleaning process (tons/month);
C_i = The weight percentage of a single volatile HAP in each material, i (%);
EF1 = The HAPs emission factor for each coating category (lbs/lbs);
EF2 = The HAPs emission factor for tank cleaning process (lbs/lbs).

(B) The emissions of any combination of HAPs from the coating formulation and packaging line (CF-1) shall not exceed 24.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month. The total HAPs emissions equals the summation of all single HAPs emissions calculated by the equation in (A).

(2) The cold cleaning units located at this source do not contain any combination of the halogenated HAP solvents, in a total concentration greater than 5 percent by weight. Therefore, the NESHAP for Halogenated Solvent Cleaning (40 CFR 63.460, Subpart T) does not apply to these units.

(c) The requirements of Section 112(j) of the Clean Air Act (40 CFR Part 63.50 through 63.56) are not applicable to this source because the source is not a major source of hazardous air pollutant (HAP) emissions (i.e., the source does not have the potential to emit 10 tons per year or greater of a single HAP or 25 tons per year or greater of a combination of HAPs).

(d) This source does not have pollutant-specific emissions unit with the potential to emit after control in an amount equal to or greater than 100 tons per year. Therefore, the requirements of 40 CFR 64, Compliance Assurance Monitoring, are not applicable.

State Rule Applicability – Entire Source

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

This regulation applies to sources with the PTE criteria air pollutants (PM, CO, VOC, NO_x, and SO₂) in excess of 100 tons per year. The source wide emissions are less than 100 tons per year for all criteria pollutants. Therefore, 326 IAC 1-5-2 regulation does not apply to the source.

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

This source is included on the list of 28 source categories as a Chemical Process Plant since the first two digits of the Source Industry Code (SIC) are 28. The potential emissions of all regulated air pollutants are less than the major PSD source levels. Therefore, the requirements of 326 IAC 2-2 are not applicable.

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

This source is not subject to 326 IAC 2-4.1, because it has not been constructed or reconstructed a major source of HAPs after July 27, 1997. In addition, pursuant to SPM 097-15604-00040, the Permittee has chosen to limit the HAPs emissions from the entire source to less than the HAP major source thresholds.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting) because it is subject to the requirements of 326 IAC 2-7, Part 70 Permit program. This statement must be received in accordance with the compliance schedule specified in 326 IAC 2-6-3 and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the period identified in 326 IAC 2-6.

326 IAC 5-1 (Opacity Limitations)

This source is located in Marion County. 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 thirty percent (30%) 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 8-6 (Organic Solvent Emission Limitations)

This source is located in Marion County and was existing as of January 1, 1980. 326 IAC 8-6-1 does not apply to this source because this source does not have potential emissions of one hundred (100) tons or greater per year of VOC.

State Rule Applicability – Individual Facilities

326 IAC 1-6-3 (Preventive Maintenance Plan)

OES is not requiring a preventative maintenance plan for any for the emission units covered in this permit, since the units are either uncontrolled and do not have actual emissions greater than 25 tons per year, or controlled with allowable emissions of less than ten (10) pounds per hour.

326 IAC 6-2-2 (Particulate Emission Limitations for Sources of Indirect Heating)

The boilers, OSB and YSB, are subject to 326 IAC 6-2-2 because they were installed prior to September 21, 1983 and are located in Marion County. Pursuant to this rule, particulate emissions from these facilities shall be limited by the following equation:

$$Pt = 0.87/Q^{0.16}$$

where Pt = Pounds of particulate matter emitted per million Btu (lb/mmBtu) heat input; and

Q = Total source maximum operating capacity rating in million Btu per hour (MMBtu/hr) heat input.

For OSB and YSB, Q equals 43.5 pounds per million Btu. Therefore, Pt equals 0.48 pounds per million Btu.

326 IAC 6-3-2 (Particulate Emission Limitations)

- (a) 326 IAC 6-3-2(d) applies to emissions unit SB28. Pursuant to this rule, SB28 shall be controlled by a dry particulate filter. The source shall operate the filter in accordance with manufacturer's specifications.
- (b) 326 IAC 6-3-2(e) applies to emission units CF-1, and EU-17. Pursuant to this rule, the particulate emissions for these units shall be limited by the following equation:

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

The process weight rates for CF-1, and EU-17 are 3.32, and 0.37 tons per hour, respectively. The allowable rate of emissions for CF-1 is 9.16 pounds per hour. The allowable rate of emission for EU-17 is 2.1 pounds per hour.

- (c) Pursuant to 326 IAC 6-3-1(b)(14) and 326 IAC 6-3-1(15), this rule does not apply to the Quality Assurance paint booths because they use less than five (5) gallons per day, and have potential emissions of less than five hundred fifty-one thousandths (0.551) pounds per hour.

326 IAC 7-1.1-2 (Sulfur Dioxide Emissions Limitations)

The dual fired boiler, identified as OSB, is subject to the 326 IAC 7-1.1-2 because this boiler has the potential to emit greater than 25 tons per year of SO₂. Pursuant to this rule, SO₂ emissions are limited to 0.5 pounds per million Btu when combusting distillate oil. Based on the annual emissions statements for the source, this facility is in compliance with 326 IAC 7-1.1-2.

326 IAC 8-1-6 (New facilities; general reduction requirements)

This rule applies to all facilities constructed after January 1, 1980 which have potential VOC emissions greater than 25 tons per year, and which are not limited by any other provisions under 326 IAC 8. This rule does not apply to any of the facilities located at this source due to date of installation and/or the potential VOC emissions.

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

This rule does not apply to the totes paint booth, identified as SB28, or the seven (7) quality assurance paint booths because the first two digits of the source industry code (SIC) are 28, and the source does not coat farm machinery, small household appliances, office equipment, or industrial machinery.

326 IAC 8-3-2 (Organic Solvent Degreasing Operations)

This rule does not apply to the 30 cold solvent cleaning units because the source is located in Marion county and has the potential to emit less than one hundred (100) tons per year of VOC.

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

326 IAC 8-3-5 applies to the 30 cold solvent cleaning units since the source is located in Marion County and the units were existing as of July 1, 1990.

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:
 - (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand or foot if:

- (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.
- (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
- (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
- (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
- (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
- (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when the solvent which is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (1) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

Compliance Requirements

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

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

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

The Coating Formulation and Packaging Line, identified as CF-1, the Tote Paint Spray Booth, identified as SB28, and the Latex Paint Production Line, identified as EU-17 have applicable compliance monitoring conditions as specified below:

- (a) Visible emissions notations of from the Coating Formulation and Packaging Line, identified as CF-1, and the Latex Paint Production Line, identified as EU-17, shall be performed once per shift during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting start up or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (b) The Permittee shall record the total static pressure drop across the baghouses controlling the Coating Formulation and Packaging Line, identified as CF-1, and the Latex Paint Production Line, identified as EU-17, once per shift when the the Coating Formulation and Packaging Line and the Latex Paint Production Line are in operation. The pressure drop across the baghouses shall be maintained within a range of 3.0 to 6.0 inches of water or a range established during the latest stack test.
- (c) An inspection shall be performed each calendar quarter of all bags and filters controlling Units CF-1, SB28, and EU-17 when venting to the atmosphere. All defective bags and filters shall be replaced. Inspections required by this condition shall not be performed in consecutive months.

These baghouses and filters for the Coating Formulation and Packaging Line, identified as CF-1, the Tote Paint Spray Booth, identified as SB28, and the Latex Paint Production Line, identified as EU-17 must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations).

Conclusion

The operation of this coating manufacturer shall be subject to the conditions of this Part 70 permit renewal 097-18308-00040.

Appendix A: Emission Calculations

F

Company Name: Valspar Industrial, Incorporated
 Plant Location: 546 West Abbott Street, Indianapolis, Indiana 46225
 Title V #: T097-18308-00040
 Permit Reviewer: Angelique Oliger

Facility: Orr and Sembower boiler, OSB

Heat input capacity (MMBtu/hr)	14.5
Heat Content of #2 Fuel Oil (Btu/gal)	145000
Heat Content of Natural Gas (BTU/cf)	1000
Maximum Firing Rate #2 Fuel Oil (Mgal/hr)	0.1
Maximum Firing Rate Natural Gas (MMcf/hr)	0.0145
S = Weight % Sulfur	0.5 %
Date Installed	1960

Potential Emissions

Pollutant	PM	PM-10	SO2	NOx	VOC	CO	Lead
Distillate Oil (lb/kgal) AP-42	2	1	71	20	0.2	5	0
Natural Gas (lbs/MMcf) AP-42	1.9	7.6	0.6	100	5.5	84	5.00E-04
Pollutant	PM	PM-10	SO2	NOx	VOC	CO	Lead
Distillate Oil	0.88	0.44	31.10	8.76	0.09	2.19	0.00
Natural Gas	0.12	0.48	0.04	6.35	0.35	5.33	0.00
Potential Emissions	0.88	0.48	31.10	8.76	0.35	5.33	0.00

Methodology:

1 gallon of No. 2 Fuel Oil has a heating value of 145,000 Btu, Natural Gas has a heating value of 1000 Btu/cf.

Emission Factors are from AP 42, Tables 1.3-2 and 1.3-4 (SCC 1-02-005-01/02/03) for Distillate Oil and AP-42, Tables 1.4-1,2,3, and 5 for Natural Gas

Emissions from Distillate Oil Combustion - Emission (tons/yr) = Throughput (kgals/ yr) x Emission Factor (lb/kgal)/2,000 lb/ton

Emissions from Natural Gas Combustion - Emission (tons/yr) = Throughput (MMcf/ yr) x Emission Factor (lb/MMcf)/2,000 lb/ton

Limited Potential to Emit

Pollutant	Regulation	Limitation
PM	326 IAC 6-2-2	0.57 lbs/MMBtu
SO2	326 IAC 7-2.1-2	0.5 lbs/MMBtu when combusting distillate oil

The Limitation for PM was calculated as follows:

For OSB and YSB combined

$$Pt = 0.87/Q^{0.16}$$

Pt = 0.48 lbs/MMBtu
 Q = 43.5 MMBtu/hr

**Appendix A: Emission Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Small Industrial Boiler**

Company Name: Valspar Industrial, Incorporated
 Plant Location: 546 West Abbott Street, Indianapolis, Indiana 46225
 Title V #: T097-18308-00040
 Permit Reviewer: Angelique Olinger

Facility: York Shipley boiler, YSB

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

29.0

254.0

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.2	1.0	0.1	12.7	0.7	10.7

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

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

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03

(SUPPLEMENT D 3/98)

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

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

Company Name: Valspar Industrial, Incorporated
 Plant Location: 546 West Abbott Street, Indianapolis, Indiana 46225
 Title V #: T097-18308-00040
 Permit Reviewer: Angelique Oligier

Facility: York Shipley boiler, YSB

HAPs - Organics					
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	0.00027	0.00015	0.00953	0.22864	0.00043

HAPs - Metals					
	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	0.00006	0.00014	0.00018	0.00005	0.00027

Methodology is the same as page 1.

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

Appendix A: Emission Calculations

Company Name: Valspar Industrial, Incorporated
 Plant Location: 546 West Abbott Street, Indianapolis, Indiana 46225
 Title V #: T097-18308-00040
 Permit Reviewer: Angelique Oligier

Facility: Coating Formulation and Packaging Line, CF-1,
 and Latex Paint Production Line, EU-17

VOC Emission

Product Group	Emissions Factors (lb VOC/lbs Coating)*	Throughput (gallons/yr)	Density (lbs/gal)	Weight Throughput (ton/yr)	Potential Emissions (tons/yr)**
Office Equipment Coating	0.00068	112,405	7.52	423	0.29
Clear Wood Finishes	0.00123	2,365,770	7.52	8895	10.94
Pigmented Wood Finishes	0.00048	2,352,640	6.94	8164	3.92
Ecoat	0.0002	1,116	8.85	5	0.00
Coil Coating	0.00031	4	10	0	0.00
General Metal Finishes	0.00071	1,971,217	7.9	7786	5.53
Pigmented Automotive Coatings	0.00272	266,325	7.56	1007	2.74
General Metals High VOC	0.00326	38,651	7.38	143	0.46
Water Reducible Genreal Metals	0.00025	626,665	8.47	2654	0.66
Latex, EU-17	7.44E-07	575,739	11.29	3250	0.00
Total				32326	24.55

*Emissions Factors based on "USEPA Emission Inventory Improvement Program Volume II: Chapter 8, Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Facilities; Revised Final August 2000 (EIIP), and include emissions from mixing, heating, loading, and filling.

**Potential Emissions (tons/yr) = ef (lbs VOC / lbs coating) * density (lbs coating/gal) * throughput (gal/yr) * 1 ton / 2000 lbs

PM/PM10 Emissions	CF-1	EU-17	Total
Site Specific Emission Factor (lb/ton of pigment)	5.14	5.14	
Maximum Pigment Usage (tons/yr)	29,076	3250	32,326
Potential PM/PM10 Emissions (tons/yr)	74.73	8.35	83.08
Control Efficiency	99.9%	99.9%	
Controlled Emissions (pounds per hour)	0.0171	0.0019	0.0190
Allowable Emissions (pounds per hour) ***	9.160	2.110	11.270

***The Allowable PM emissions rate pursuant to 326 IAC 6-3 is calculated as follows:

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

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

$$\text{Allowable Emissions (tons/yr)} = E * 1 \text{ ton} / 2000 \text{ lbs} * 8760 \text{ hrs} / 1 \text{ year}$$

Company Name: Valspar Industrial, Incorporated
 Plant Location: 546 West Abbott Street, Indianapolis, Indiana 46225
 Title V #: T097-18308-00040
 Permit Reviewer: Angelique Oligier

Facility: Coating Formulation and Packaging Line, CF-1, and Latex Paint Production Line, EU-17

Product Group	Emissions Factor (lb/gal)*															
	Butyl Cellulose	Cumene	Dimethyl Formamide	Ethylbenzene	Ethylene Glycol	Glycol Ether	MEK	Methanol	Methyl Methacrylate	MIBK	Propylene Oxide	Toluene	Triethylamine	Vinyl Acetate	Xylene	Total
Office Equipment Coating	6.00E-05	2.20E-05	0.00E+00	1.30E-04	0.00E+00	4.20E-05	0.00E+00	0.00E+00	5.30E-05	2.60E-04	0.00E+00	5.30E-03	0.00E+00	0.00E+00	5.40E-04	6.41E-03
Clear Wood Finishes	1.40E-06	4.60E-07	0.00E+00	7.70E-05	0.00E+00	3.50E-06	6.40E-04	8.70E-04	0.00E+00	0.00E+00	0.00E+00	7.10E-04	0.00E+00	0.00E+00	3.20E-04	2.62E-03
Pigmented Wood Finishes	0.00E+00	3.30E-07	0.00E+00	5.10E-05	1.60E-05	3.40E-06	1.30E-03	9.80E-05	2.80E-06	1.60E-04	0.00E+00	2.00E-04	0.00E+00	3.50E-06	2.10E-04	2.05E-03
Ecoat	8.90E-05	0.00E+00	0.00E+00	5.50E-06	0.00E+00	8.40E-05	0.00E+00	1.70E-04	0.00E+00	4.90E-05	0.00E+00	0.00E+00	0.00E+00	0.00E+00	2.30E-05	4.21E-04
Coil Coating	8.70E-05	1.10E-05	0.00E+00	9.00E-05	0.00E+00	3.10E-07	0.00E+00	1.80E-05	0.00E+00	7.20E-07	0.00E+00	5.30E-07	1.20E-05	0.00E+00	3.70E-04	5.90E-04
General Metal Finishes	4.20E-05	1.00E-05	0.00E+00	1.30E-04	0.00E+00	2.30E-05	1.10E-03	0.00E+00	0.00E+00	7.20E-05	0.00E+00	7.50E-03	2.70E-04	0.00E+00	5.40E-04	9.69E-03
Pigmented Automotive Coatings	5.30E-05	1.40E-06	0.00E+00	7.60E-05	6.00E-05	8.30E-06	1.20E-02	9.40E-04	0.00E+00	1.10E-03	0.00E+00	2.40E-03	1.30E-04	1.10E-06	3.10E-04	1.71E-02
General Metals High VOC	0.00E+00	0.00E+00	8.80E-04	1.30E-04	0.00E+00	0.00E+00	1.30E-02	0.00E+00	0.00E+00	4.40E-03	9.00E-04	0.00E+00	0.00E+00	3.10E-05	5.20E-04	1.99E-02
Water Reducible Genreal Metals	8.00E-05	1.30E-05	0.00E+00	1.50E-05	1.70E-04	5.20E-05	0.00E+00	0.00E+00	0.00E+00	2.40E-05	0.00E+00	1.50E-05	5.90E-04	0.00E+00	1.00E-04	1.06E-03
Latex, EU-17	0.00E+00	0.00E+00	0.00E+00	0.00E+00	8.40E-06	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	8.40E-06

Product Group	Potential Emissions (tons/yr)**															
	Butyl Cellulose	Cumene	Dimethyl Formamide	Ethylbenzene	Ethylene Glycol	Glycol Ether	MEK	Methanol	Methyl Methacrylate	MIBK	Propylene Oxide	Toluene	Triethylamine	Vinyl Acetate	Xylene	Total
Office Equipment Coating	3.37E-03	1.24E-03	0.00E+00	7.31E-03	0.00E+00	2.36E-03	0.00E+00	0.00E+00	2.98E-03	1.46E-02	0.00E+00	2.98E-01	0.00E+00	0.00E+00	3.03E-02	3.60E-01
Clear Wood Finishes	1.66E-03	5.44E-04	0.00E+00	9.11E-02	0.00E+00	4.14E-03	7.57E-01	1.03E+00	0.00E+00	0.00E+00	0.00E+00	8.40E-01	0.00E+00	0.00E+00	3.79E-01	3.10E+00
Pigmented Wood Finishes	0.00E+00	3.88E-04	0.00E+00	6.00E-02	1.88E-02	4.00E-03	1.53E+00	1.15E-01	3.29E-03	1.88E-01	0.00E+00	2.35E-01	0.00E+00	4.12E-03	2.47E-01	2.41E+00
Ecoat	4.97E-05	0.00E+00	0.00E+00	3.07E-06	0.00E+00	4.69E-05	0.00E+00	9.49E-05	0.00E+00	2.73E-05	0.00E+00	0.00E+00	0.00E+00	0.00E+00	1.28E-05	2.35E-04
Coil Coating	1.74E-07	2.20E-08	0.00E+00	1.80E-07	0.00E+00	6.20E-10	0.00E+00	3.60E-08	0.00E+00	1.44E-09	0.00E+00	1.06E-09	2.40E-08	0.00E+00	7.40E-07	1.18E-06
General Metal Finishes	4.14E-02	9.86E-03	0.00E+00	1.28E-01	0.00E+00	2.27E-02	1.08E+00	0.00E+00	0.00E+00	7.10E-02	0.00E+00	7.39E+00	2.66E-01	0.00E+00	5.32E-01	9.55E+00
Pigmented Automotive Coatings	7.06E-03	1.86E-04	0.00E+00	1.01E-02	7.99E-03	1.11E-03	1.60E+00	1.25E-01	0.00E+00	1.46E-01	0.00E+00	3.20E-01	1.73E-02	1.46E-04	4.13E-02	2.27E+00
General Metals High VOC	0.00E+00	0.00E+00	1.70E-02	2.51E-03	0.00E+00	0.00E+00	2.51E-01	0.00E+00	0.00E+00	8.50E-02	1.74E-02	0.00E+00	0.00E+00	5.99E-04	1.00E-02	3.84E-01
Water Reducible Genreal Metals	2.51E-02	4.07E-03	0.00E+00	4.70E-03	5.33E-02	1.63E-02	0.00E+00	0.00E+00	0.00E+00	7.52E-03	0.00E+00	4.70E-03	1.85E-01	0.00E+00	3.13E-02	3.32E-01
Latex, EU-17	0.00E+00	0.00E+00	0.00E+00	0.00E+00	2.42E-03	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	2.42E-03
Total	7.86E-02	1.63E-02	1.70E-02	3.04E-01	8.25E-02	5.06E-02	5.22E+00	1.27E+00	6.27E-03	5.13E-01	1.74E-02	9.09E+00	4.68E-01	4.86E-03	1.27E+00	18.41

*Emissions Factors based on "USEPA Emission Inventory Improvement Program Volume II: Chapter 8, Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Facilities; Revised Final August 2000 (EIIP), and include emissions from mixing, heating, loading, and filling.

**Potential Emissions (tons/yr) = Throughput (gal/yr) * ef (lb/gal) * 1 ton / 2000 lbs

Appendix A: Emission Calculations

Company Name: Valspar Industrial, Incorporated
 Plant Location: 546 West Abbott Street, Indianapolis, Indiana 46225
 Title V #: T097-18308-00040
 Permit Reviewer: Angelique Oliger

Facility: Paint Booth for coating of Totes, SB28

Type of Control Device Dry Filter
 Type Application System Air Atomization
 Stack ID SB28
 Stack Flow Rate (acfm) 6500
 Date Installed 1977

Potential Emissions

Material	Density (Lb/Gal)	Weight % Volatile (H2O& Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Maximum Usage (gal/hr)
Enamel	9.9	60.00%	0.0%	60.0%	0.0%	40.00%	0.0013

Material	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential ton/yr	lb VOC /gal solids
Enamel	5.94	5.94	0.01	0.19	0.03	0.02	14.85

Material	Transfer Efficiency
Enamel	20%

METHODOLOGY

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

Company Name: Valspar Industrial, Incorporated
 Plant Location: 546 West Abbott Street, Indianapolis, Indiana 46225
 Title V #: T097-18308-00040
 Permit Reviewer: Angelique Oliger

Facility: Tanks

Tanks Emissions Calculations based on Tanks 4.0 Emissions Report for all 230 tanks containing VOCs

Pollutant	Potential Emissions (tons/yr)
1,2,4-Trimethylbenzene	0.077
Dimethyl Formamide	0.002
Ethylbenzene	0.021
Formaldehyde	0.050
Glycol Ether	0.004
MEK	0.160
MIBK	0.039
Toluene	0.126
Xylene	0.086
Total HAPs	0.565
Total VOCs	1.101

Tank and Equipment Clean-up Emissions

Potential Cleanup Solvent Usage = 646,784 lbs
 AP-42 Emissions Factor = 1% loss
 Potential Cleanup Solvent Emissions= **3.27 tons VOC /yr**

HAPs Speciation	Mass Fraction in vapor	Annual Emissions (tons/yr)*
Butyl Cellosolve	0.29%	0.0095
MEK	60.87%	1.9928
MIBK	3.68%	0.1205
Toluene	17.89%	0.5857
Xylene	8.51%	0.2786
Total		2.9871

* Annual HAP Emissions (tons/yr) = Potential solvent emissions (tons/yr) * mass fraction of HAP in vapor

Company Name: Valspar Industrial, Incorporated
 Plant Location: 546 West Abbott Street, Indianapolis, Indiana 46225
 Title V #: T097-18308-00040
 Permit Reviewer: Angelique Oligier

Seven QA Paint Booths

Total potential paint usage*	1113 lbs/yr
VOC content	60%
VOC PTE	0.33 tons/yr of VOC
Pounds PM/PM10 per ton paint	5.14
PM/PM10 PTE	0.00143 tons/yr of PM/PM10

* This is equivalent to less than one gallons per day:

$$1113 \text{ lbs/yr} * 1 \text{ yr} / 365 \text{ days} * 1 \text{ gal} / 7 \text{ lbs} = 0.436 \text{ gallons per day}$$

Solvent Recovery Unit

The unit operates under a vacuum

The annual VOC emissions were estimated using the method for vacuum generating units as outlined in U.S. EPA CTG document about batch processing. The VOC emissions were estimated to be 0.24 lbs/hr. Assuming the unit operates on a continuous basis the potential emissions would be 5.76 lbs/day and **1.05 tons per year**.

Appendix A: Emission Calculations

F

Company Name: Valspar Industrial, Incorporated
 Plant Location: 546 West Abbott Street, Indianapolis, Indiana 46225
 Title V #: T097-18308-00040
 Permit Reviewer: Angelique Oliger

Potential Emissions Summary

Facility	Pollutant						
	PM	PM-10	SO2	NOx	VOC	CO	HAPs*
OSB	0.88	0.48	31.10	8.76	0.35	5.33	
YSB	0.24	0.97	0.08	12.70	0.70	10.67	
CF-1 & EU-17	74.73	74.73			24.55		18.41
SB28	0.02	0.02			0.03		
Tanks					1.10		0.57
Tank Clean-up					3.27		2.99
Insig. Activities	0.0014	0.0014			1.38		
Total	75.86	76.19	31.17	21.46	30.00	16.00	21.96

*See HAPs Table below

HAPs Summary

Facility	Butyl Cellulose	Cumene	Dimethyl Formamide	Ethyl-benzene	Ethylene Glycol	Glycol Ether	MEK	Methanol	Methyl Methacrylate
OSB									
YSB									
CF-1 & EU-17	7.86E-02	1.63E-02	1.70E-02	0.30	8.25E-02	5.06E-02	5.22	1.27	6.27E-03
SB28									
Tanks				0.021		0.004	0.16		
Tank Clean-up	9.49E-03						1.99		
Total	0.09	0.02	0.02	0.32	0.08	0.05	7.37	1.27	0.01

HAPs Summary (cont'd)

Facility	Propylene Oxide	Xylene	Toluene	Triethyl-amine	Vinyl Acetate	1,2,4-Trimethyl-benzene	Dimethyl Formamide	Formaldehyde	Total
OSB									0.00
YSB									0.00
CF-1 & EU-17	1.74E-02	1.27	9.09	4.68E-01	0.00				18.41
SB28									0.00
Tanks		0.086	0.126			0.077	0.002	0.05	0.57
Tank Clean-up		0.28	0.59						2.99
Total	0.02	1.64	9.80	0.47	0.00	0.08	0.00	0.05	21.96

MIBK
0.51
0.039
0.12
0.67